

## Communication from Public

**Name:** Duncan Joseph Moore

**Date Submitted:** 10/29/2021 11:51 AM

**Council File No:** 21-0829

**Comments for Public Posting:** Dear Chair Councilmember Harris-Dawson and Honorable Members of the PLUM Committee: Please include the attached letter as part of the Reese Davidson Community Vesting Tentative Tract Map and CPC file, Council File Nos. 21-0829, 21-0820-S1.



October 29, 2021

**VIA PUBLIC COMMENT PORTAL**

Los Angeles City Council  
Planning and Land Use Management (PLUM) Committee  
200 North Spring Street  
Los Angeles, CA 90012

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Council File Nos. 21-0829, 21-0829-S1  
November 2, 2021 Meeting

Re: Reese Davidson Community: Response to Appeal (VTT-82288;  
ENV-2018-6667-SE; CPC-2018-7344-GPAJ-VZCJ-HD-SP-SPP-CDP-MEL-  
SPR-PHP-1A)

Dear Chair Councilmember Harris-Dawson and Honorable Members of the PLUM Committee,

On behalf of Venice Community Housing Corporation and Hollywood Community Housing Corporation, this letter responds to Venice Vision's ("Appellant") appeals of the City Planning Commission's unanimous approval of the Reese Davidson Community Project ("Project"). The Project includes service-enriched affordable and supportive housing, small-scale retail, community amenities, and a public parking structure and will be developed on an underutilized City of Los Angeles-owned parking lot in the Venice neighborhood. The Project provides 140 new apartments and meets the criteria for both a 100% affordable housing development and a qualified permanent supportive housing development.

The Advisory Agency approved the Project's Vesting Tentative Tract Map 82288 ("VTTM") on February 2, 2021. On February 16, 2021, Appellant appealed the Advisory Agency's approval of the VTTM to the City Planning Commission ("Planning Commission"). On May 27, 2021 the Planning Commission held a hearing on the Project. At the hearing, the Planning Commission denied Venice Vision's appeal, sustained the Advisory Agency's approval, and approved the VTTM and adopted conditions of approval and findings in support of the VTTM. On July 13, 2021, the Planning Commission issued a letter of determination finding the Project exempt from the California Environmental Quality Act ("CEQA") and approving and recommending the City Council adopt a General Plan Amendment, a Specific Plan Amendment and a Vesting Zone and Height District Change, among other related entitlements. Appellant then appealed the determinations. For the reasons set forth in **Attachment A** of this letter, and as briefly summarized below, each of Appellant's claims lack

merit and should not alter any of the Planning Commission's determinations. In addition, **Attachment B** of this letter is a PowerPoint Presentation providing an overview of the Project and summarizing why Appellant's claims lack merit.

- **Environmental Impact:** The Project complies with Government Code Section 66474 and CEQA. The Planning Commission made adequate findings in compliance with Government Code Section 66474(e), and the Project will not cause substantial injury to fish or wildlife or their habitat. The site is already a developed asphalt parking lot; thus, its conversion to housing and commercial uses will not result in any additional or meaningful environmental impacts. Additionally, the Project is exempt from the CEQA under the AB 1197 exemption as a permanent supportive housing project.
- **Map and Subdivision Consistency:** The Project will be consistent with the General and Specific Plans because the Project entitlements request amendments to those Plans. The VTTM is conditioned on the Project obtaining necessary entitlements, and the Subdivision Map Act expressly permits approvals of maps conditioned on approvals of general plan amendments, specific plan amendments, and other approvals. The proposed General Plan and Specific Plan amendments are also consistent with the use, height, and bulk of development in the surrounding area. The proposed General Plan amendment is also consistent with the Los Angeles City Charter because it concerns a geographic area that has social, economic, and physical identity.
- **Open Space Requirements:** The proposed Project is consistent with the City's Open Space requirements. The current site, consisting of an underutilized parking lot and four residential units, has very minimal publically accessible open space. The Project will increase public access for recreational opportunities along the Grand Canal, enhance public parking for coastal access, and address the supply shortage of affordable housing in the Venice Beach area.
- **Design Consistency:** The Project is consistent with the applicable General and Specific Plans. The Project will provide enhanced public access to the Grand Canal with more public beach parking than exists today and dedicated parking spaces for the existing boat launch. Appellant provides no evidence that automated parking would slow, discourage, or otherwise impact parking at the Project site. Evidence in the City's record confirms that parking lots in the area have enough excess capacity to compensate for temporary parking losses during construction. When constructed, the Project will contain a new parking facility that will provide Code-required parking, replacement beach parking, and additional surplus parking. The City is not required to establish the site – a parking lot that has existed for decades – as a public park.
- **Physical Suitability and Surrounding Area:** The Project site is more than adequate – it has frontage on four streets, level land, available utilities, and reflects uses consistent with the neighborhood. Expert analysis demonstrates sea level rise is not anticipated to impact the Project, and the Project will comply with the standard

infrastructure requirements. The Project will seamlessly integrate with the neighborhood and surrounding area and is compatible with the surrounding properties. The Project's three-story massing, height, façade, and architectural features are compatible with surrounding buildings.

- **Density:** The Project site is suitable for the proposed density of the development. First, the Project's engineering and sea level rise consultants have shown that actual flooding at the site is not probable over the Project's 75-year useful life. Second, Science Application for Risk Reduction (SAFRR) modeling demonstrates that the Project site is not within a tsunami inundation zone. Third, the Project's compliance with the City's Methane ordinance limits any health risks caused by the site's location within a city-designated methane zone. Fourth, the Project's design limits risks associated with liquefaction. Fifth, both the Bureau of Engineering and the Department of Transportation have found that the Project and abutting public rights of ways are sufficient for public access despite the left-turn only access/egress at the site.
- **Health and Safety:** The Project will not impact the public's health due to flood risks. As discussed above, the Project site is not within a tsunami inundation zone and is not vulnerable to sea level rise and flood risk due to sea level rise. While Appellant asserts that the Project will negatively impact open space and therefore the public's health, the Project meets the City's open space and landscaping requirements by providing plentiful open space – substantially more than exists on the site today – and by enhancing pedestrian access with new walkways, seating, and landscaping that are all beneficial to public health.
- **Mello Act Compliance** The Project is consistent with the Mello Act. The Project includes 100 percent affordable housing units and consists of 136 affordable dwelling units and four manager units. Half of the affordable units are designated as supportive housing for those experiencing homelessness while the other half are designated for low-income individuals or households.
- **Public Access:** The Project will not conflict with easements at large for public access. The Planning Commission correctly concluded that the Project will maintain the Canal and adjacent Esplanade as a public right of way. The Project not only will maintain the existing public access but also expand direct public access to the Canal. Additionally, the Project will observe all existing utility easements and not adversely impact any sensitive habits.
- **Fair Hearing and Brown Act Compliance:** Both the Advisory Agency and Planning Commission provided fair hearings. Appellant has provided no evidence of significant defects or prejudice. Further, no Brown Act violation occurred at the Planning Commission hearing; all Commissioners were present, either on video or audio, as permitted under the Brown Act.

**LATHAM & WATKINS** LLP

Based on the foregoing, we respectfully request that the PLUM Committee deny Appellant's appeals and approve the Project as proposed and conditioned. On behalf of our pro-bono clients, who have a notable track record of developing needed affordable housing projects in the City, we thank you for your consideration and look forward to presenting the Project to you next week.

Very truly yours,



Duncan Joseph Moore  
of LATHAM & WATKINS LLP

cc: Elizabeth Gallardo, Los Angeles City Planner  
Ira Brown, City Planning Associate  
Becky Dennison, VCHC  
Sarah Letts, HCHC  
Christopher Murray, Rosenheim & Associates, Inc.  
Beth Gordie, Latham & Watkins LLP

# **ATTACHMENT A**

## **ATTACHMENT A**

### **RESPONSE TO APPEAL JUSTIFICATIONS**

#### **I. INTRODUCTION**

The Advisory Agency approved Vesting Tentative Tract Map 82288 ("VTTM" or "VTTM-82288") for the Reese Davidson Community Project ("Project") on February 2, 2021. On February 16, 2021, Venice Vision ("Appellant") appealed the Advisory Agency's approval of VTTM-82288 to the Los Angeles City Planning Commission ("Planning Commission"). On May 27, 2021 the Planning Commission held a hearing to consider the appeal and the Project's other requested entitlements. At the hearing, the Planning Commission denied Venice Vision's appeal, sustained the determination of the Advisory Agency, and approved and recommended that the City Council adopt the VTTM and all other Project entitlements. On July 13, 2021, the Planning Commission issued a letter of determination approving the VTTM ("VTTM LOD"), and issued a letter of determination finding the Project exempt from the California Environmental Quality Act ("CEQA") and approving and recommending the City Council adopt a General Plan Amendment, a Specific Plan Amendment and a Vesting Zone and Height District Change, among other related entitlements ("CPC LOD"). Appellant has now filed an appeal of the Planning Commission's VTTM approval and an appeal of the Planning Commission's approval of the Project's other entitlements (collectively, the "Appeal"). Appellant continues to press meritless arguments it already has made to the Advisory Agency and the Planning Commission, which both of those bodies rejected. Below are detailed responses to the arguments and claims made in the Appeal. For the reasons set forth in our prior submissions to the City and as detailed below, we respectfully request that the PLUM Committee recommend that the City Council deny the Appeal and approve the Project and its requested entitlements.

#### **II. THE CITY PROVIDED A FAIR HEARING AT BOTH ADVISORY AGENCY AND CITY PLANNING COMMISSION LEVELS AND DID NOT VIOLATE THE BROWN ACT**

##### **A. A Fair Hearing Was Provided Before The Advisory Agency And The Planning Commission**

Appellant asserts that the City "abandoned" its efforts to comply with CEQA and the Subdivision Map Act by not preparing an EIR. (Letter from Channel Law Group regarding Justifications of Appeal for Vesting Tentative Tract for the Reese Davidson Project dated July 22, 2021 ("VTTM Appeal Letter"), p. 2; Letter from Channel Law Group regarding Justifications of Appeal of the Reese Davidson Project dated August 2, 2021 ("CPC Appeal Letter"), p. 2.) Appellant asserts that it therefore sought the "complete case file and public records related to the abandoned EIR, but the City has refused to provide many of these documents[.]" (*Ibid.*) Appellant argues that because of this, it was denied a fair hearing under

CCP Section 1094.5.<sup>1</sup> Appellant's fair hearing argument is a last ditch attempt to salvage its challenge to the Project.

The EIR for the project was not "abandoned." The Notice of Preparation for the Project was issued on December 18, 2018. The Project then became exempt from CEQA under Assembly Bill ("AB") 1197, which was signed into law on September 26, 2019, and exempts from CEQA's requirements certain activities and actions that are approved or carried out by the City related to the provision of supportive housing, including the Project. The City followed all applicable requirements of AB 1197 and did not "abandon" CEQA's requirements.

The record does not support the allegations that the City failed to provide Appellant with a fair hearing. Appellant complains that the hearing was unfair because the City has not provided materials to Appellant related to the City's decision to follow AB 1197's CEQA exemption for the Project. (VTTM Appeal Letter, p. 2; CPC Appeal Letter, p. 2.) However, as discussed in section XIII below, there is substantial evidence to support the CEQA exemption pursuant to Public Resources Code Section 21080.27(b)(1). The City provided "substantial evidence demonstrating that the proposed project 1) qualifies as supportive housing pursuant to Health and Safety Code Section 50675.14; 2) meets the eligibility requirements of Article 11 (commencing with Section 65650) of Chapter 3 of Division I of Title 7 of the Government Code; and 3) is funded, in part, by the Measure H sales tax proceeds approved by the voters in the March 17, 2017, special election in the County of Los Angeles." (Department of City Planning May 27, 2021 Recommendation Report, Exhibit I Justification for Project Exemption.) All of this material was made publicly available in advance of the Planning Commission's hearing on the Project. As such, there has been no prejudice or denial of a fair hearing. Any preliminary CEQA analysis the City may or may not have conducted is irrelevant to whether the Project complies with AB 1197's requirements.

Further, a determination that an agency failed to provide a fair hearing is reserved for much more significant defects than those alleged by Appellant. (E.g., *Manufactured Home Communities, Inc. v. Cty. of San Luis Obispo* (2008) 167 Cal.App.4th 705, 710-12 [denial of cross-examination]; *Dept. of Alcoholic Beverage Control v. Alcoholic Beverage Control Appeals Bd.* (2006) 40 Cal.4th 1, 16-17 [improper ex parte contacts]; *Haas v. Cty. of San Bernardino* (2002) 27 Cal.4th 1017, 1020 [financial interest of decision maker]; *Smith v. State Bd. of Pharmacy* (1995) 37 Cal.App.4th 229, 241 [lack of notice of charges' legal basis].) Further, to warrant relief, an agency's denial of a fair hearing must result in **prejudice**, which Appellant fails to demonstrate here. (*Guilbert v. Regents of Univ. of Cal.* (1979) 93 Cal.App.3d 233, 241-42; *El-Attar v. Hollywood Presbyterian Med. Ctr.* (2013) 56 Cal.4th 976, 990-91.)

Finally, Appellant also asserts that the City misstated the number of support letters and that this constituted presentation of false information resulting in a denial of a fair hearing. (VTTM Appeal Letter, p. 2; CPC Appeal Letter, p. 2.) Even if true, one minor misstatement of the number of letters received does not amount to denial of a fair hearing or prejudice.

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<sup>1</sup> CCP section 1094.5 enables a petitioner to challenge an administrative decision after an adjudicatory hearing in which the agency performs a fact finding function.



## **B. No Brown Act Violations Have Occurred**

Appellant next asserts that the Planning Commission violated the Brown Act “as applied by the Governor’s emergency orders related to COVID-19 virtual meetings,” during the May 27, 2021 hearing because the Commissioners did not leave their Zoom cameras on at all times. (VTTM Appeal Letter, p. 2; CPC Appeal Letter, pp. 2-3.) But there is no such requirement under the law. Government Code Section 54953 requires all public meetings of the legislative body of a local agency to be “open and public.” This section also provides that “teleconferencing, as authorized by this section, may be used for all purposes in connection with any meeting within the subject matter jurisdiction of the legislative body.” (*Id.* § 54953(b)(2).) Teleconference “means a meeting of a legislative body, the members of which are in different locations, connected by electronic means, through either audio or video, or both.” (*Id.* § 54953(b)(4) [emphasis added].) Moreover, Governor Newsom’s Executive Order N-29-20,<sup>2</sup> which incorporates Executive Order N-25-20,<sup>3</sup> provides that the physical presence of members of the legislative body are not required as a condition of participation in or quorum for a public meeting.

Simply because some Planning Commissioners did not have their cameras on at all times does not create a Brown Act violation. All Planning Commissioners were present during the May 27, 2021 hearing through Zoom. (May 27, 2021 Planning Commission Hearing Transcript, pp. 79-81, attached as **Exhibit A**.) President Millman assured the public that all Commissioners were present. (*Ibid.*) Indeed, President Millman noted during the hearing that certain Commissioners turned off the video feed of their cameras to eat lunch. (*Ibid.*) This does not constitute a violation of either the Brown Act statute or Governor Newsom’s Executive Orders, which permit teleconferencing through either audio or video.

Appellant also asserts that it “appears that certain Commissioners failed to disclose conflicts that may have made it improper for them to participate in the hearing.” (CPC Appeal Letter, p. 3.) However, Appellant offers no evidence of any conflict, nor does it even name specific Commissioners who are alleged to have a conflict. The Planning Commissioners present at the May 27, 2021 hearing properly heard the case and there is no evidence in the record of any conflicts that prevented them from doing so.

## **III. THE MAP IS CONSISTENT WITH THE GENERAL AND SPECIFIC PLANS**

### **A. The Planning Commission Appropriately Conditioned Approval Of The VTTM Based On Amendments To The General Plan And Specific Plan**

Appellant argues that because the Project entitlements require amendments to the General and Specific Plans, the Planning Commission erred when it determined that the Project was consistent with the General Plan and Specific Plan. (VTTM Appeal Letter, pp. 3-4; CPC Appeal Letter, pp. 3-4.) As explained in detail in the RDC May 17, 2021 Letter, incorporated by

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<sup>2</sup> Available at <https://www.gov.ca.gov/wp-content/uploads/2020/03/3.17.20-N-29-20-EO.pdf>.

<sup>3</sup> Available at <https://www.gov.ca.gov/wp-content/uploads/2020/03/3.12.20-EO-N-25-20-COVID-19.pdf>.

reference, Appellant misunderstands the law. (RDC May 17, 2021 Letter, Attachment A, pp. 2-3.)

Here, in addition to the VTTM, the Applicant has also applied for a General Plan Amendment and Venice Coastal Zone Specific Plan ("Specific Plan") Amendment, under CPC-2018-7344-GPAJ-VZCJ-HD-SP-SPP-CDP-MEL-WDI-SPR-PHP (the "Entitlements"). The Planning Commission conditioned its approval of the VTTM on the Project obtaining approval of the Entitlements. (See VTT LOD, pp. C-7, F-2.) This is expressly permitted under the Subdivision Map Act, which authorizes approvals of maps conditioned on approvals of general plan amendments, specific plan amendments, and other approvals. Government Code Section 66498.3(a) states that "[t]he local agency may deny a vesting tentative map or approve it conditioned on the subdivider, or his or her designee, obtaining the necessary change in the zoning ordinance to eliminate the inconsistency." The Planning Commission properly conditioned approval on obtaining the necessary zone change and other entitlements.

Condition 22 of the VTTM LOD requires that prior to recordation of a final map, a copy of the decision letter for CPC-2018-7344-GPAJ-VZCJ-HD-SP-SPP-CDP-MEL-WDI-SPRPHP (the "Entitlements Decision") must be submitted, and if not, the subdivider must submit a tract map modification. (See VTTM LOD, pp. C-7, F-2.) Therefore, contrary to Appellant's assertion that this process forecloses the City Council from approving anything other than the Project's requested entitlements, the Determination specifically provides a process to modify the tract map in the event that the requested Entitlements are not approved. (*Ibid.*) California Government Code Section 66498.1 also provides that "an approved or conditionally approved vesting tentative map shall not limit a local agency from imposing reasonable conditions on subsequent required approvals or permits necessary for the development." Therefore, the VTTM LOD does not foreclose any of the future decision-makers' options with respect to the Project's requested entitlements.

## **B. The Proposed Amendments Are Consistent With The City Charter**

Appellant contends that the City of Los Angeles lacks the authority to process a general plan amendment under City Charter Section 555. (VTTM Appeal Letter, p. 4; CPC Appeal Letter, p. 4.) The Project's proposed General Plan Amendment is consistent with the City Charter. Section 555(a) provides that a general plan may be amended "in its entirety, by subject elements or parts of subject elements, or by geographic areas, provided that the part or area involved has significant social, economic or physical identity." As discussed in the RDC May 17, 2021 Letter, the Project's proposed General Plan Amendment is consistent with Section 555(a) because it concerns a geographic area that has social, economic, and physical identity. (RDC May 17, 2021 Letter, Attachment A, pp. 3-4.) The parcels have significant physical identity because of their location among the Venice Canals and the project site's bifurcation by the Grand Canal, among other things. The future use of the site as an affordable housing development with public seating, amenities, landscaping, a boat launch, and community serving uses, all serve to activate the northern entrance to the Venice Canals. The Project also will contribute to and strengthen the social, physical, and economic identity of the surrounding area through the provision of public space and public access to the Project site which does not currently exist. Therefore, the General Plan Amendment is consistent with Charter Section 555(a).

### **C. The Proposed Amendments Are Not “Spot Zoning”**

Appellant alleges that the Project is an example of spot zoning and that amending the applicable plans would constitute spot zoning. (VTTM Appeal Letter, p. 5; CPC Appeal Letter, p. 4.) Once again, Appellant has not shown that the characteristics of impermissible spot zoning have occurred – i.e., that unfair discrimination against a particular parcel has occurred. (See RDC May 17, 2021 Letter, Attachment A, p. 4, citing *Ross v. City of Yorba Linda* (1991) 1 Cal.App.4th 954, 960.) No unfair discrimination has occurred here, and the proposed General Plan and Specific Plan amendments will make the Project site consistent with the general uses, height, and bulk of development in the surrounding area. (*Ibid.*) For example, the Project’s residential density is similar to the density of the adjacent parcels on North and South Venice Boulevard zoned R3, its commercial uses are similar to those permitted on other commercial properties on Pacific Avenue, and its three-story height (with a four-story architectural campanile located at the northwest corner of the Property), also is consistent with the scale of existing development in the immediate vicinity. (*Ibid.*)

### **D. The Proposed Amendments Are Consistent With The Exclusive Negotiation Agreement**

Appellant also argues that the Project violates the Exclusive Negotiating Agreement that the Applicant entered into with the City because that Agreement requires the Project to comply with the Specific Plan and the Venice Land Use Plan (“LUP”). (VTTM Appeal Letter, p. 5; CPC Appeal Letter, p. 5.) As already discussed above, the Project is properly conditioned on approval of amendments to the General and Specific Plans. The Project will therefore be in compliance with all the City’s land use documents, including the Specific Plan and the LUP, if it is approved by the City Council.

## **IV. THE PROPOSED AMENDMENTS ARE CONSISTENT WITH OPEN SPACE REQUIREMENTS**

As explained in the RDC May 17, 2021 Letter, Appellant’s contention that the Project violates Open Space requirements is false. (RDC May 17, 2021 Letter, Attachment A, pp. 4-5.) The Venice Community Plan (“Community Plan”) is more than 20 years old, and although the Project site is currently designated as Open Space, the site in its current condition contains no publicly accessible open space. The existing uses—an underutilized parking lot, bisected by the Grand Canal, with four residential units—are inconsistent with the Project site’s existing Open Space designation, and provide very little accessible space for the public to experience and enjoy the Grand Canal. In addition, the existing uses are inconsistent with the OS zone. The Project instead will improve public access and add space for recreation along the Grand Canal, public parking for coastal access, and address the ongoing, unmet demand for affordable housing in the Venice area and the broader Los Angeles region. The Project will increase public open space compared to the current existing uses on the site. It will provide approximately 16,250 square feet of open space, including 4,930 square feet of landscaped space. The Project also will enhance the pedestrian access to the site by providing pedestrian pathways along the Grand Canal, converting the existing automobile bridge crossing the Grand Canal to a pedestrian and bicycle-only bridge, and setting back the buildings on both sides of the Grand Canal to provide terraced seating, landscaping and plaza areas for public access, circulation, and recreation. To

activate the public space, the Project also proposes new landscaping along the east side of the Grand Canal with new public walkways and seating areas. These improvements will enhance public access significantly compared to the existing underutilized surface parking lot on the Project site.

## **V. THE DESIGN AND IMPROVEMENTS OF THE PROPOSED SUBDIVISION ARE CONSISTENT WITH THE APPLICABLE GENERAL AND SPECIFIC PLANS**

Appellant recycles the same contentions it raised previously to allege that the Project's design and improvements are inconsistent with the General and Specific Plans. (VTTM Appeal Letter, pp. 6-7; CPC Appeal Letter, pp. 6-7.) For all the reasons discussed in the RDC May 17, 2021 Letter and summarized below, the Project's design and improvements are consistent with the applicable General Plan and Specific Plan requirements, including the LUP's public access policies:

- **Beach Parking Automation.** Appellant provides no evidence that automated parking would slow, discourage, or otherwise impact parking at the Project site. In addition, Condition 13 provides that a parking area and driveway plan must be submitted for [City or LADOT] approval prior to submittal of building permit plans for plan check.
- **Beach Parking During Construction.** The record evidence confirms the parking lots in the Project area have ample excess capacity to compensate for any parking losses during Project construction. (Venice Parking Study, Tierra West Advisors, June 2020, p. 6 [Attached to Appeal Letters].) There is no current significant shortage in parking that needs to be addressed.
- **Public Access For Canal Boating.** The Project is consistent with Policy III.D.2 because it enhances public access for canal boating compared to existing conditions. The Project will preserve the existing boat launch within the Grand Canal, create a dedicated boat loading zone on the south side of North Venice Boulevard, and provide three parking spaces for vehicles carrying non-motorized watercraft in the Project's parking garages.
- **Public Parking Improvements.** The Project's parking facility within a new multi-level parking structure would not only replace the 196 parking spaces currently provided in Municipal Lot 731, but provide 27 additional public parking spaces in the East Garage. The Project also is consistent with LUP Parking Policy II.A.1, which states that "[i]t is the policy of the City to provide increased parking opportunities for both visitors and residents of Venice, and improve summer weekend conditions with respect to Venice Beach parking and traffic control." The Project provides surplus parking in addition to the 196 replacement parking spaces, thereby increasing parking opportunities for visitors and residents.
- **Park Space.** This LUP policy does not specifically state that the Project site is either intended to be or was designated as a future park. Policy III.D.6 states: "New parks,

with parking to the rear, shall be considered on some of the City-owned lots on the canals, provided that such facilities are compatible with the existing residential use of the area.” However, the policy does not direct or require the City to establish a park. In addition, the policy also does not identify the Project site as a particular location for a park. Nevertheless, as explained above, the Project significantly improves open space and public access compared to existing conditions, and denial of this Project would not result in creation of a public park or open space on the Project site. Moreover, Appellant’s suggestion that the Project site should provide a park is inconsistent with Appellant’s separate objection that the Project site should increase public parking. (RDC May 17, 2021 Letter, Attachment A, pp. 5-7.) Finally, as stated in the CPC LOD, “the Venice Coastal Zone and City of Los Angeles is in the midst of a housing crisis with great demand for affordable housing. The proposed supportive housing project would develop affordable housing in a predominately residential neighborhood and create an open and accessible public recreational area adjacent to the existing canal waterway and Esplanade.” (CPC LOD, p. F-37 to F-38.)

## **VI. THE SITE IS PHYSICALLY SUITABLE FOR THE PROPOSED TYPE OF DEVELOPMENT**

The site is physically suited for the proposed housing Project. The Property has frontage on four streets, the land is level, utilities are available, the proposed FAR of 1.15:1 is not in excess of surrounding development, the proposed building height echoes building heights in the vicinity, and the proposed residential, commercial, and parking uses reflect uses on adjacent parcels and elsewhere in Venice.

Appellant argues that the location is not physically suitable for the proposed development because the Project would require a merger of 40 existing lots. (VTTM Appeal Letter, pp. 7-8; CPC Appeal Letter, pp. 7-8.) This is irrelevant to the physical suitability of the site for the proposed development. (RDC May 17, 2021 Letter, Attachment A, p. 7.) Further, Applicants seek amendments to the Specific Plan and LUP to permit lot consolidation. (*Ibid.*) If the entitlements are approved, the Project will be consistent with the amended Specific Plan and LUP. (*Ibid.*)

Appellant next argues that the Project is unsuitable due to sea level rise. (VTTM Appeal Letter, p. 8; CPC Appeal Letter, p. 8.) However, as explained in the RDC May 27, 2021 Letter, the Project’s engineering and sea level rise consultant, GeoSoils, Inc., conducted a sea level rise analysis for the Project, including modeling the sea level rise for the Project site, which concluded that actual flooding would not be probable due to sea level rise during the Project’s 75-year design life. (RDC May 17, 2021 Letter, Attachment A, pp. 7-8.)

Finally, Appellant states there is no evidence that existing infrastructure is adequate to support the Project. (VTTM Appeal Letter, p. 8; CPC Appeal Letter, p. 8.) Appellant does not identify any specific deficiencies with respect to existing infrastructure to support the Project, and the Project does not propose any construction or changes within the Venice Canals. Further, standard infrastructure requirements are set forth in the Project’s Conditions of Approval, including with respect to street lighting, fire hydrants, street trees, power lines, water mains, and



other utilities. (RDC May 17, 2021 Letter, Attachment A, p. 8.) The Project therefore is required to comply with specific infrastructure standards.

## **VII. THE PROJECT IS COMPATIBLE WITH THE SURROUNDING AREA**

Appellant argues that the Project is incompatible with the surrounding area and would subvert neighborhood character in violation of the Specific Plan and LUP. (VTTM Appeal Letter, pp. 8-9; CPC Appeal Letter, pp. 8-9.) The Project is compatible with the adjacent properties, which in general are zoned R3, RD1.5 and C1, and allow for multiple-story apartment and residential buildings and commercial buildings. The Project's proposed density of 53 dwelling units per acre is consistent with the range permitted by the Community Plan's Medium Density Residential land use designation, the three-story Project massing is compatible with the one- to four-story heights of surrounding buildings, and the 35-foot height of the Project with the 59-foot high campanile is consistent with most adjacent buildings. (CPC LOD, pp. F-31 to F-32; VTTM LOD, p. F-6.)

The Project also has been carefully designed to integrate with the surrounding architecture. As viewed from the abutting streets, the Project utilizes architectural features to differentiate the building's façade, such as varied rooflines, setbacks along the Grand Canal, varied colors, breaks in the façade depth including stairway openings, varying windows sizes to minimize scale, and landscaping. New street trees will also provide additional visual breaks along its perimeter. (See RDC May 17, 2021 Letter, Attachment A, p. 8 [providing additional information].)

## **VIII. THE SITE IS SUITABLE FOR THE PROPOSED DENSITY OF DEVELOPMENT**

Appellant continues to argue that various potential hazards exist on the Project site without any evidence or explanation of unsuitability. (VTTM Appeal Letter, p. 9; CPC Appeal Letter, p. 9.) As fully discussed in the RDC May 17, 2021 Letter, Appellant's arguments regarding the density of development are meritless for the following reasons:

- **Sea Level Rise and Flood Risk.** The Project site is not vulnerable to sea level rise and flood risk due to sea level rise. GeoSoils, Inc., the Project's engineering and sea level rise consultant, determined that actual flooding would not be probable at the Project site due to sea level rise during the Project's 75-year design life. GeoSoils, Inc. also recommended the following measure, which will be incorporated into the Project: "The lowest finished floor (FF) elevation (not garage floor) should be 2 feet, or more, above the street flow line until reaching elevation 11 feet NAVD88, and for street flow lines above + 11 feet NAVD88 the FF elevation should be a minimum of 1 foot above the flow line, unless other adaptive waterproofing alternatives are incorporated in the design." (RDC May 17, 2021 Letter, Ex. A, p. 10.)
- **Tsunami Inundation Zone.** As explained in the RDC May 17, 2021 Letter, GeoSoils, Inc. conducted an analysis of the Project site's tsunami risk, and analyzed the Science Application for Risk Reduction ("SAFRR") tsunami study by USGS tsunami scenario with a 200-240 year recurrence interval (the "GeoSoils Report"). (RDC May 17, 2021 Letter, Ex. A, p. 8 [GeoSoils Report].) According to GeoSoils, Inc., the SAFRR

modeling output revealed that the Project site is not within a tsunami inundation zone. (*Ibid.*) Although the site is designated in the California Office of Emergency Services tsunami inundation map, this map has limited uses. The California Office of Emergency Services Local Planning Guidance on Tsunami Response explains that “[i]nundation projections and resulting planning maps are to be used for emergency planning purposes only,” and “[t]he inundation maps are not a prediction of the performance, in an earthquake or tsunami, of any structure within or outside of the projected inundation zone.”

- **Methane Zone.** The Project site is not unsuitable for development because it is located in a methane zone. While the site is located within a City-designated Methane Zone, the Project will comply with the City’s Methane Ordinance requirements (LAMC Section 91.704), including providing an appropriate methane mitigation system.
- **Liquefaction Zone.** The Project site is not unsuitable because it is located in a liquefaction zone. As explained in the VTTM LOD, “the tract has been approved contingent upon the satisfaction of the Department of Building and Safety, Grading Division prior to the recordation of the map and issuance of any permits. The Department of Building and Safety, Grading Division has issued a Soils Report Approval Letter, dated August 10, 2018, stating that the referenced reports are acceptable, provided that the Project complies with applicable conditions. The recommendations from the August 10, 2018 letter have been imposed as Conditions of Approval of the tract map.” (VTTM LOD, p. F-5.) As required by the Soils Report Approval Letter (Exhibit C to RDC May 17, 2021 Letter), any potential for liquefaction will be addressed by the Project’s design, including, for example, the implementation of foundation design that will minimize the effects of settlement on the Project.
- **Left-turn Only Site Access/Egress.** The Project is not unsuitable due to hazards presented by left-turn only site access/egress necessitated by the one-way street system adjacent to the Project site. North Venice Boulevard is one-way westbound and South Venice Boulevard is one-way eastbound. Thus, the one-way street system is an existing condition; the existing parking lot on the Project site provides the same left-turn ingress and egress turning movements due to the existence of the one-way streets. Project ingress and egress will continue to be provided onto North and South Venice Boulevards. As the VTTM LOD explains, the Bureau of Engineering and the Department of Transportation have found the Project site and abutting public rights-of-way sufficient to continue to provide adequate public access through and adjacent to the Project site.

(RDC May 17, 2021 Letter, Attachment A, pp. 8-10 [providing additional information].)

## **IX. THE DESIGN OF THE SUBDIVISION AND THE PROPOSED IMPROVEMENTS ARE NOT LIKELY TO CAUSE SERIOUS HEALTH PROBLEMS**

The VTTM LOD explains that the Project is subject to the requirements of the LAMC, and other health and safety related requirements, and is not likely to cause public health problems. (VTTM LOD, pp. F-6 to F-7.)

Appellant argues that construction of the Project in a flood hazard and tsunami zone will cause serious public health issues. (CPC Appeal Letter, pp. 9-11; VTTM Appeal Letter, pp. 21-23.) As explained above in Section VIII, and in the RDC May 17, 2021 Letter, although the Project is in a designated tsunami inundation zone, the California Office of Emergency Services Local Planning Guidance on Tsunami Response explains that “[i]nundation projections and resulting planning maps are to be used for emergency planning purposes only,” and “[t]he inundation maps are not a prediction of the performance, in an earthquake or tsunami, of any structure within or outside of the projected inundation zone.” The Project’s engineering and sea level rise consultant, GeoSoils, Inc., conducted a site specific analysis of the Project’s tsunami risk, and analyzed the SAFRR tsunami study by USGS tsunami scenario with a 200-240 year recurrence interval. According to GeoSoils, Inc., the SAFRR modeling output revealed that the Project site is not within a tsunami inundation zone. (RDC May 17, 2021 Letter, Attachment A, pp. 13-14.) Further, GeoSoils’ SAFRR modeling output revealed that the Project site is not within a tsunami inundation zone. (RDC May 17, 2021 Letter, Ex. A, p. 8 [GeoSoils Report].) Moreover, actual flooding of the Project site due to sea level rise during the Project’s 75-year design life is not probable. (*Id.* at pp. 4-7.)

Appellant also repeats its open space concerns, citing the Community Plan, which states, “where possible develop new Open Space.” (VTTM Appeal Letter, p. 21.) As discussed above, the site in its current condition contains very little publicly accessible open space, limited solely to the public access point of the Grand Canal. The Project provides approximately 16,250 square feet of open space, including 4,930 square feet of landscaped space. The Project also will enhance the pedestrian access to the site by providing pedestrian pathways along the Grand Canal, converting the existing automobile bridge crossing the Grand Canal to a pedestrian and bicycle-only bridge, and setting the buildings back on both sides of the Grand Canal to provide terraced seating, landscaping and plaza areas for public access, circulation, and recreation. The Project also proposes new landscaping along the east side of the Grand Canal, with new walkways and seating areas for the public to access. These improvements will significantly enhance public access and public health compared to the existing underutilized surface parking lot on the Project site.

Appellant argues that the City’s vulnerability assessment, which evaluates sea level rise to support an update to the City’s Local Coastal Program, demonstrates that the Project site is anticipated to flood from exceedance of stormwater capacity and/or tide gate malfunction with 6.6 feet of sea level rise. (CPC Appeal Letter, p. 11; VTTM Appeal Letter, p. 22.) While the City’s vulnerability assessment does conclude that 6.6 feet is a tipping point for Venice, the vulnerability assessment assumed that a 6.6 feet scenario would not occur until 2090 to 2100. (Venice Sea Level Rise Vulnerability Assessment, p. 11.<sup>4</sup>) Moreover, this Venice-wide study did not specifically consider the proposed Project or site. According to GeoSoils, Inc., using the latest sea level rise projections, *the maximum sea level rise over the design life of the building, which is 75 years, is approximately 5.6 feet.* (RDC May 17, 2021 Letter, Ex. A, p. 9 [GeoSoils Report].) According to CosMoS modeling, sea level rise would need to be in excess of

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<sup>4</sup> Available at: [https://planning.lacity.org/odocument/83cf6597-25f1-4fd7-8124-dcd015000d82/venice\\_coastal\\_zone\\_slr\\_vulnerability\\_assessment\\_-\\_nov.\\_2018\\_copy.pdf](https://planning.lacity.org/odocument/83cf6597-25f1-4fd7-8124-dcd015000d82/venice_coastal_zone_slr_vulnerability_assessment_-_nov._2018_copy.pdf)



approximately six feet before the buildings may be subject to flooding, and this is unlikely to occur during the project's 75-year design life. (RDC May 17, 2021 Letter, Ex. A, pp. 9-10.)

The VTTM appeal letter from Channel Law Group makes reference to a screening level Health Risk Assessment prepared by SWAPE and states that it indicates the project will result in an excess cancer risk. (See VTTM Appeal Letter, pp. 20-21). A separate Health Risk Assessment is forthcoming that will address these concerns.

#### **X. THE CITY'S APPROVAL WAS NOT BASED ON ERRONEOUS, OUTDATED FLOOD INFORMATION**

Appellant argues that the City's approval of the Project's VTTM was based on outdated information because on April 21, 2021, FEMA adopted new flood hazard maps showing that the Project site is in a Special Flood Hazard Area designated Zone AE-EL8, subject to flooding reaching 8 feet above sea level. (CPC Appeal Letter, pp. 12-13; VTTM Appeal Letter, pp. 23-25.)

As previously explained in the RDC May 17, 2021 Letter, GeoSoils, Inc., considered the new FEMA maps in December 2020, when the maps were still preliminary. GeoSoils confirmed that when the preliminary FEMA maps became effective in April 2021, no changes were made to the maps that were relevant to GeoSoils' prior analysis or the Project. (FEMA Clarification/Discussion for Reese Davidson Community, GeoSoils, Inc., October 20, 2021 attached as **Exhibit B**.) The Project was designed to account for the 8 foot base flood elevation in FEMA's preliminary flood insurance rate maps. The lowest finished first floor will be at or above elevation ~+8.25 feet North American Vertical Datum (NAVD88) or "Sea Level" and will be to the northeast of the Grand Canal. (RDC May 17, 2021 Letter, Ex. A, p. 2.) The higher finished floor elevations will be at or above elevation ~+10.5 feet Sea Level and will be to the west of the Grand Canal. (*Id.*) Further, the GeoSoils Report concluded that Actual flooding would not be probable due to sea level rise during the Project's 75-year design life. (*Id.* p. 9.)

Appellant also wrongly asserts that the Project does not meet the Lowest First Finished Floor requirements of the Flood Hazard Management Specific Plan. (CPC Appeal Letter, p. 13; VTTM Appeal Letter, p. 24.) Not all of the Project site is in the AE Zone; rather, only the portion of the site east of the canal is within the AE Zone. The portion of the project east of the canal will be at or above elevation ~+8.25 feet North American Vertical Datum (NAVD88). The portions west of the canal will be at or above elevation ~+10.5 feet NAVD88. (*Id.*)

The Project also will comply with the Flood Hazard Management Specific Plan, through Condition 22, which includes flood-related mitigation measures as recommended by the GeoSoils Report. Therefore, the Lowest First Finished Floor requirements of the Flood Hazard Management Specific Plan are satisfied.

#### **XI. THE PROJECT IS CONSISTENT WITH PUBLIC NECESSITY, CONVENIENCE, GENERAL WELFARE AND GOOD ZONING PRACTICE AND THE CALIFORNIA COASTAL ACT OF 1976**

Appellant's Justification Letter for its Appeal of the CPC decision argues the "Project is not consistent with the public necessity, convenience, general welfare and good zoning practice

[and] does not conform to the California Coastal Act of 1976.” (CPC Appeal Letter, p. 5.) Accordingly to Appellants, the City is unable to make such a finding necessary for Vesting Zone Change, Height District Change, “T” and “Q” Classification Findings, Specific Plan Amendment Findings and coastal development findings. (CPC Appeal Letter, p. 5.) Appellant’s argument is based solely on the same arguments refuted in Sections IV to X above, as repeated in Appellant’s VTTM Appeal Letter. (CPC Appeal Letter, pp. 5-9.) As explained above, there is no basis for these arguments.

## **XII. MELLO ACT COMPLIANCE REVIEW WAS NOT FAULTY**

Appellant argues that the Applicant has not provided sufficient verifiable documentation, and HCIDLA has therefore not been able to verify the affordability of the four residential units on the Property. It further asserts that “the proposed ‘replacement’ units will be inferior to existing units on multiple objective dimensions, including size, accessibility, noise levels, safety and livability, constituting a Mello Act violation.” (CPC Appeal Letter, pp. 13-14.)

Broadly, the Mello Act requires local agencies approving “[t]he conversion or demolition of existing residential dwelling units occupied by persons and families of low or moderate income” within a coastal zone to require “replacement of those dwelling units with units for persons and families of low or moderate income.” (Gov’t Code § 65590(b).) New housing developments within the coastal zone must also include low- or moderate-income housing to the extent feasible under the Mello Act. (Gov’t Code § 65590(d).)

The Project is consistent with the Mello Act, as described in the CPC LOD. The Project includes the demolition of a multi-family structure containing four 2 bedroom residential units. As explained in the CPC LOD, replacement of these four units is required. (CPC LOD, p. F-56.) The Project fulfills the Mello Act requirements: it involves the construction of a 100 percent affordable housing development consisting of 140 residential dwelling units (136 restricted affordable dwelling units and 4 unrestricted Manager Units). Of the 136 low-income units, 68 units are designated for permanent supportive housing for those experiencing homelessness and 68 units are designated for low-income individuals or households, restricted by covenant for 55 years. (CPC LOD, pp. F-33, F-55 to 57.) Aside from a conclusory statement, Appellant offers no substantial evidence that the new units will be inferior. Regardless, the units will comply with the City’s current policy on accessibility, which is far more stringent than what is required for existing buildings.

## **XIII. THE PROJECT IS NOT LIKELY TO CAUSE SUBSTANTIAL ENVIRONMENTAL DAMAGE**

### **A. The Advisory Agency and Planning Commission Made Adequate Findings In Compliance With Government Code Section 66474(E)**

The Project proposes an urban infill housing development on a site that is currently an underutilized asphalt parking lot. Since the Project site is already a developed asphalt parking lot, its conversion to housing and commercial uses would not result in meaningful environmental impacts. Appellant argues that even if the Project was exempt from the California

Environmental Quality Act ("CEQA"), the City must make environmental findings as part of the VTTM approval. (CPC Appeal Letter, p. 24; VTTM Appeal Letter, pp. 9-10.)

First, the City is not required to conduct additional analysis under CEQA since the Project is exempt. (*Muzzy Ranch Co. v. Solano County Airport Land Use Com.* (2007) 41 Cal.4th 372, 380 ["If a public agency properly finds that a project is exempt from CEQA, no further environmental review is necessary"].) Second, the City has complied with Government Code Section 66474 by finding that the design of the subdivision and the proposed improvements are not likely to cause substantial environmental damage or substantially and avoidably injure fish or wildlife or their habitat.

The City's findings confirm that the Project site does not: (1) contain any natural open spaces, (2) act as a wildlife corridor, (3) contain riparian habitat, (4) contain wetland habitat, (5) contain migratory corridors, (6) conflict with a Habitat Conservation Plan, (7) possess any areas of significant biological resource value, (8) encroach or construct structures within the Grand Canal Esplanade or within the canal, or (9) contain native or protected trees. In addition, the Planning Commission explained that the Project design is subject to compliance with the requirements of the zoning and building code, and regulatory compliance measures. (VTTM LOD, p. F-6.) Therefore, ample support exists for the environmental findings required by Government Code Section 66474.

Finally, Appellant attaches to its letters a screening-level Health Risk Assessment prepared by SWAPE and alleges that the Project will result in excess cancer risk. (CPC Appeal Letter, pp. 24-25, Ex. C; VTTM Appeal Letter, pp. 20-21, Ex. C.) **Exhibit C** attached herein is a response prepared Eyestone Environmental, which demonstrates that SWAPE's analysis and conclusions are misleading, highly inaccurate, and lack credibility. Furthermore, as discussed below, the Project is exempt from CEQA review under Assembly Bill 1197 as a permanent supportive housing project consistent with AB 1197's eligibility requirements. Nevertheless, for informational purposes, Eyestone Environmental also prepared as part of its response a health risk assessment, which provides an analysis of potential health risk impacts related to the proposed construction and operation of the Project. As detailed in the HRA, any health risk impacts would be less than significant. Specifically, Eyestone Environmental determined: for carcinogenic exposures (construction and operational), the increase in risk is calculated to be 5.5 in one million, which is less than the applicable threshold of 10 in one million for sensitive receptors immediately north of the Project Site, resulting in a less than significant impact; and for chronic non-carcinogenic exposures (construction and operational), the increase in the respiratory hazard index was estimated to be less than the applicable threshold of one for sensitive receptors in close proximity to the Project Site, resulting in a less than significant impact.

## **B. The Project Is Exempt From CEQA**

The Advisory Agency and Planning Commission have properly determined that the Project is exempt under AB 1197. (See Exhibit I to May 27, 2021 Staff Report to CPC.) Under AB 1197, codified at Public Resources Code Section 21080.27 ("AB 1197 Exemption"), permanent supportive housing projects do not require CEQA review. Since the Project is a permanent supportive housing project consistent with AB 1197's eligibility requirements, it is

exempt from CEQA. Appellant argues that the Project is not eligible for AB 1197, largely recycling arguments from its prior comment letters, all of which have been previously addressed. (CPC Appeal Letter, p. 14; VTTM Appeal Letter, p. 10.)

1. On April 21, 2020, we explained in a letter addressed to the Los Angeles City Planning Department why the Project is eligible for the AB 1197 exemption ("AB 1197 Eligibility Letter," attached as **Exhibit D.**)
2. On January 27, 2021, we explained in a letter addressed to the Deputy Advisory Agency and City Hearing Officer why opponents' arguments that the Project is not eligible for AB 1197 are erroneous. ("Letter to DAA," attached as **Exhibit E.**)
3. In our May 17, 2021 letter, we explained yet again why opponents' arguments that the Project is not eligible for AB 1197 are erroneous.
4. On May 25, 2021, in a letter addressed to the Planning Commission, we responded to additional arguments from Venice Vision concerning the application of AB 1197 to the Project.

As detailed in this correspondence, the Planning Commission properly determined that the Project is consistent with AB 1197's requirements and is therefore statutorily exempt from CEQA.

First, Appellant argues that the Project uses do not meet the definition of supportive housing under AB 1197 because the Project includes nonresidential floor area. (CPC Appeal Letter, p. 22; VTTM Appeal Letter, pp. 18.) However, the AB 1197 Exemption applies to actions "in furtherance of providing emergency shelters or supportive housing," and does not preclude nonresidential floor area from homeless housing projects. The definition of "supportive housing" requires compliance with the requirements in Government Code Section 65651. This section sets forth the affordable housing percentages required for supportive housing projects and also requires that "developments of more than 20 units include at least 3% of the total nonresidential floor area for onsite supportive services." Therefore, nonresidential uses are contemplated to be included within the definition of "supportive services."

Of the Project's total nonresidential floor area of 6,905 square feet, approximately 10 percent, or 685 square feet, is dedicated to onsite supportive services. The remaining nonresidential square footage includes 2,255 square feet of retail uses, 810 square feet of restaurant uses, and 2,875 square feet of art studio uses. These community-serving uses are consistent with the 3 percent minimum requirement in Government Code Section 65651, and designed to complement and support the Project's supportive services and housing uses, and help to integrate the Project within the community.

Appellant also erroneously includes parking space, exterior walkways, common area, covered alcoves, and areas under building overhangs within its calculation of the Project's nonresidential area. (VTTM Appeal Letter, pp. 18-19.) Parking areas are expressly not included within the City's definition of "Floor Area," nor are exterior walkways because they are not confined within the exterior walls of a building. (LAMC § 12.03.) The Project's "common area" also refers to areas that are for use by the Project's residential tenants, and are therefore properly

categorized as residential space. With respect to overhangs and alcoves, Appellant includes all overhang and covered alcove space in its nonresidential floor area calculations, including the space located on the upper levels of the Project, which is clearly adjacent to residential spaces. The total project floor area is 103,957 square feet. When square footage for the interior of residential units is subtracted (64,280 square feet), 39,677 square feet is left. Then when the residential component's common area, exterior walkways, covered alcoves, and areas under building overhangs are subtracted (33,052 square feet), the remaining nonresidential floor area is 6,625 square feet. Thus, 685 square feet for onsite supportive services is well over the requirement for 3 percent of the total nonresidential floor area. This can also be calculated by adding up the following non-residential uses: office (685 square feet), retail (2,255 square feet), restaurant (810 square feet), and art studio (2,875 square feet), which equals 6,625 square feet. (RDC May 25, 2021 Letter, p. 3.)

Second, Appellant argues that the Project does not meet AB 1197's funding requirements and alleges the City must provide the public with a copy of the funding plan for each component of the project. (CPC Appeal Letter, p. 17; VTTM Appeal Letter, p. 14.) However, the definition of "supportive housing" in Public Resources Code Section 21080.27(a)(3) requires that projects be funded "in whole or in part," by certain specified funding sources. These specified funding sources include Measure H funding, and on February 16, 2018, the Project obtained a Measure H funding commitment letter from the Los Angeles County Department of Health Services Housing for Health Division. In general, affordable housing projects are built with a variety of funding sources, and the fact that the Project will be funded by sources in addition to Measure H does not render it ineligible for the AB 1197 Exemption.

Third, Appellant argues the City has failed to provide the public with information to document compliance with the requirements of Health and Safety Code Section 50675.14. (CPC Appeal Letter, pp. 17-18; VTTM Appeal Letter, pp. 14-15.) Only Health and Safety Code Sections 50675.14(b)(2)-(3), which are referenced in Public Resources Code Section 21080.27(a)(3) and Government Code Section 65650, relate to the AB 1197 Exemption. As explained in our Letter to DAA, the Project meets the definition for "supportive housing" under these sections because the Project does not limit the length of stay for its residents, will reserve more than 25 percent of the units for low-income formerly homeless members of the target population, and is linked to onsite supportive services. (See Letter to DAA, pp. 2-3.) The other provisions that Appellant cites from Health and Safety Code Section 50675.14 have no bearing on the Project's eligibility for the AB 1197 Exemption.

Fourth, Appellant argues the Project does not comply with the requirements of Government Code Section 65651, repeating the claims above. (CPC Appeal Letter, pp. 14-19.) Specifically, Appellant claims that the Project site is ineligible because the existing zoning does not permit multifamily housing. (CPC Appeal Letter, pp. 19-23; VTTM Appeal Letter, pp. 15-20.) This is a misreading of the eligibility requirements. As explained in the Letter to DAA, to qualify as supportive housing under AB 1197, a project must meet the definition of supportive housing in Health and Safety Code Section 50675.14 as well as the eligibility requirements in Government Code Sections 65650-65656. Government Code Section 65651(a) explains that "[s]upportive housing shall be a use by right in zones where multifamily and mixed uses are permitted, including nonresidential zones permitting multifamily uses, if the proposed housing development satisfies all of the following requirements." This section is followed by a checklist



of eligibility requirements. Appellant argues that the Project is not consistent with Government Code Section 65651(a) because the underlying Open Space zone does not currently permit multifamily uses. However, Appellant misreads the statute. AB 1197 does not require that the Project be located in a multifamily zone, but rather that it meet the eligibility requirements within Section 65651. The checklist of requirements under Government Code Section 65651(a) sets forth the eligibility requirements for the AB 1197 Exemption. The language allowing supportive housing to be a by right use in multifamily zones is simply a benefit that projects can obtain by complying with the requirements of Government Code Section 65651. Here, however, the Project is not seeking a by right determination. The Project is merely seeking a CEQA exemption.

Appellant also argues that the Project is ineligible for the exemption because the developer has not provided a supportive services plan to the public. (CPC Appeal Letter, p. 18; VTTM Appeal Letter, p. 14.) The Applicant has submitted a comprehensive supportive services plan, and as explained in the AB 1197 Eligibility Letter, a final plan will be provided to the planning agency, as required by Government Code Section 65651(4). Supportive services will include, among others: conducting comprehensive psychosocial assessments; developing individualized case management plans; helping residents to access food, clothes, and other basic necessities; helping residents to obtain health, mental health, and substance abuse services, as well as medication and treatment; and helping residents to obtain income and establish healthcare benefits. An approved Intensive Case Management Services provider will provide these supportive services, which will be funded with Measure H funds, and the proposed staffing for the services includes four case managers, one for every 17 supportive housing units. This satisfies the Measure H requirements for staffing (i.e., a required range of one case manager for every 15 households to one case manager for every 20 households). This information has been provided to the planning agency; a final plan will be provided prior to issuance of building permits.

#### **XIV. THE DESIGN OF THE SUBDIVISION AND PROPOSED IMPROVEMENTS WILL NOT CONFLICT WITH EASEMENTS AT LARGE FOR ACCESS THROUGH USE OF THE PROPERTY WITHIN THE PROPOSED SUBDIVISION**

Appellant states that the Planning Commission's finding that the design does not conflict with easements for access through the property is based on erroneous facts. (VTTM Appeal Letter, p. 23.) However, the Planning Commission accurately acknowledged that the Venice Canal System, which is a natural resource, recreational resource, and unique open space, bisects the Project site. (VTTM LOD, pp. F-6 to F-7.) It concluded that the canal and adjacent Esplanade will be maintained as a public right of way and access to the canal will not be inhibited. (*Ibid.*) It specifically noted that the Project would maintain existing access and provide access through the site from North and South Venice Boulevard, and will provide new public access easements consistent with the public access policies of the certified LUP. (*Ibid.*)

More specifically, the Project will provide direct access to the Grand Canal for both Project residents and the general public. It will provide parking for automobiles and bicycles, and will provide direct access for pedestrians through the existing public right-of-way immediately abutting the canal and across the Short Line Bridge. Additionally, all utility

easements on the Property have been identified through a title search and will be observed and/or modified to accommodate the Project and the providers of those services. Appellant has made no attempt to demonstrate how the Planning Commission's conclusion that the Project will provide sufficient public access is not supported by substantial evidence.

Further, although not a public access issue, Appellant also argues in this section of its VTTM Appeal Letter that the Project is adjacent to the Venice Canals, which according to the LUP, is an environmentally sensitive habitat area with foraging habitat for the Least Tern. (VTTM Appeal Letter, p. 23.) Appellant ignores evidence in the record confirming that the Project will not adversely affect this sensitive habitat.

As noted in the Project's Biological Technical Report, the Project site is already "developed," consisting of an asphalt parking lot with additional areas of hardscape and limited areas vegetated with ornamental trees and shrubs, as well as small areas of disturbed ground that support non-native weedy annual species adapted to human disturbance. (See RDC May 17, 2021 Letter Ex. G [Biological Technical Report].) The Project would convert the site from a paved asphalt parking lot to housing, commercial use, and enclosed parking. Since the Project site is already developed, this conversion would not result in meaningful increased runoff impacts to the adjacent canal or otherwise. (*Id.* at Ex. G, p. 36.) Further, although the Project site is bisected by the Grand Canal, no construction is proposed to take place within the Venice Canals. (*Id.* at Ex. G, p. 35.) In addition, the portion of the Grand Canal that bisects the Project site differs in character from the rest of the canal system, and does not feature a landscape buffer. Rather, the onsite segment consists of concrete embankments directly adjacent to concrete sidewalks that run along either side of the canal. The Project will not include any improvements to the Grand Canal, and only proposes the repair and maintenance of the existing concrete boat ramp. Therefore, the Project will not result in a direct impact to environmentally sensitive habitat areas. (*Ibid.*)

## **XV. CONCLUSION**

Appellant's claims are erroneous and lack merit. Accordingly, we respectfully request that the City Council deny Appellant's appeals (VTT-82288; ENV-20186667-SE; CPC-2018-7344-GPAJVZCJ-HD-SP-SPPCDP- MEL-SPR-PHP; ENV-20186667-SE).

# EXHIBIT A



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LOS ANGELES CITY PLANNING COMMISSION

May 27, 2021

Items 9 & 10

Page 1

<p>1       PRESIDENT SAMANTHA MILLMAN: Hello, and  2 welcome back. Before we begin, if you are  3 calling in to make public comment on this item, I  4 want to read the phone number into the record one  5 more time, so that if you are participating by  6 Zoom and for some reason you don't have a  7 microphone on your computer, or it is not working  8 for you, you can call in to testify. The number  9 is -- please write this down -- 213-338-8477.  10 The meeting ID Number is 82987601208. Passcode  11 is 068241.  12       Again, if you're participating via Zoom  13 today, our Zoom is working. I just wanted to  14 provide that as a backup, in case there is a  15 technical glitch on your end. Also, just for the  16 record, we are going to be limiting testimony to  17 two hours on this item. We'll take one hour of  18 testimony from those in opposition to the  19 project, and one hour of testimony for those in  20 favor of the project.  21       So, with that, let us begin on Items  22 Number 9 and 10, which will be heard  23 concurrently. Item Number 9 is Case Number VTT-  24 82288-1A. Item 10 is Case Number CPC-2018-7344-  25 GPAJ-VZCJ-HD-SP-SPP-CDP-MEL-SPR-PHP. The related</p> <p style="text-align: right;">Page 2</p>	<p>1 Vesting Tentative Tract Map Number ATT-82288, to  2 facilitate the proposed development. Item  3 Number 9 is the appeal of that decision. Item  4 Number 10 is the planning entitlement associated  5 with the proposed development.  6       Slide 2.  7       The subject site is located in the  8 Venice coastal zone, west of Lincoln Boulevard,  9 and approximately a quarter mile from the Venice  10 shoreline.  11       Slide 3.  12       The project is generally located on a  13 block bounded by North Venice Boulevard, South  14 Venice Boulevard, Pacific Avenue, and Dell  15 Avenue. It is separated into a west site and  16 east site by the terminus of the Grand Canal,  17 which becomes Canal Street north of South Venice  18 Boulevard.  19       The project site is approximately  20 115,674 square feet, or 2.65 acres, consisting of  21 40 lots, and improved with a service parking lot  22 containing 196 parking spaces, electric, the  23 Pacific Electric Short Line Bridge, and a four-  24 unit apartment building.  25       Slides 4 and 5.</p> <p style="text-align: right;">Page 4</p>
<p>1 environmental is ENV-2018-6667-SE. The project  2 is located at 2102 through 2120 South Pacific  3 Avenue and various addresses within Council  4 District 11. Irene, do we have any day-of  5 submissions for this item?  6       IRENE GONZALEZ: Irene Gonzalez, for  7 the record. Yes, Commissioners, I'd like to  8 direct you to the CPC share drive. We do have  9 day-of submissions for this item. For members of  10 the public, compliant day-of submissions can be  11 viewed on the shared drive by clicking on the  12 link on the top of the first page of the agenda.  13       PRESIDENT SAMANTHA MILLMAN: Thank you.  14 At this time, we're going to hear from city  15 planning staff. Ira, please go ahead with your  16 presentation.  17       IRA BROWN: Good morning, President and  18 members of the City Planning Commission. My name  19 is Ira Brown, City Planning Associate with the  20 Department of City Planning, and I'll be  21 providing the staff presentation.  22       Items Number 9 and 10 are for the  23 proposed Reese Davidson community, a 100-percent-  24 affordable housing development. On February 2,  25 2021, the deputy advised me that she approved</p> <p style="text-align: right;">Page 3</p>	<p>1       The project is designated and zoned  2 open space. The project site is located in the  3 dual permit jurisdiction of the coastal zone, as  4 well as the Venice Coastal Zone Specific Plan.  5       Slide 6 shows the existing four-unit  6 apartment building located on the subject site.  7 This image is taken from North Venice Boulevard.  8       Slide 7 shows the terminus of the  9 Venice Canals and the boat launch abutting the  10 project site. This image is taken from North  11 Venice Boulevard.  12       Slide 8 shows the existing surface  13 parking lot located on the subject site. This  14 image is taken from Pacific Avenue.  15       Slide 9 shows an aerial of the project  16 sites. In general, the properties to the west,  17 east, and north are developed with multifamily  18 residential and commercial uses and zoned R3,  19 RD1.5, C1, and C1.5. The properties to the south  20 are developed with multifamily and single-family  21 residential uses and are zoned R3 and RW.  22       Slide 10.  23       As shown on Slide 10, a (indiscernible)  24 study was prepared by the (indiscernible), which  25 illustrates that the surrounding neighborhood</p> <p style="text-align: right;">Page 5</p>

<p>1 consists of many structures that are over 35 feet 2 in height.</p> <p>3 Slide 11 shows the project description.</p> <p>4 The project includes the demolition of the 5 existing surface parking lot and a four-unit 6 proper building, and the merger and re- 7 subdivision to create two ground lots and seven 8 air space lots to construct a mixed-use, 100- 9 percent-affordable housing development, 10 consisting of 140 dwelling units, of which four 11 are managers' units and 34 are joint living and 12 work quarters, support services, retail uses, and 13 a restaurant and an art studio use. The proposed 14 project provides a total of 357 parking spaces, 15 comprising of residential, commercial, and public 16 spaces.</p> <p>17 Slide 12 shows a rendering of the 18 proposed project looking north from Pacific 19 Avenue. The (indiscernible) at the corner of 20 Pacific Avenue and North Venice Boulevard is the 21 tallest portion of the project site.</p> <p>22 Slides 13 and 14 outline the planning 23 entitlements. Based on the whole of the 24 administrative record, staff has determined that 25 the project is statutorily exempt from CEQA</p> <p style="text-align: right;">Page 6</p>	<p>1 foot site to create two ground lots and seven 2 airspace lots.</p> <p>3 Slide 15 shows the existing site plan.</p> <p>4 Slide 16 shows the proposed site plan.</p> <p>5 The project is located on two sites west and east 6 of the Grand Canal. This portion of the canal is 7 noted as Canal Street in the land use plan. 8 (indiscernible) has proposed a public right of 9 way along the Grand Canal.</p> <p>10 The development consists of a four- 11 story, 36,157-square-foot structure on the west 12 site, and a three-story, 67,800-square-foot site 13 located -- structure, that is -- located on the 14 east side.</p> <p>15 Slide 17 shows the ground-floor level 16 of the structure on the west site. Retail uses 17 are provided along Pacific Avenue, and a 18 restaurant is located on South Venice Boulevard, 19 adjacent to the Grand Canal. Vehicle access is 20 provided by a two-way driveway along North Venice 21 Boulevard and South Venice Boulevard.</p> <p>22 Slide 18 shows the second and third 23 floorplans. As shown here, the residential units 24 wrap a four-level parking garage, which provides 25 parking for the residential and commercial uses.</p> <p style="text-align: right;">Page 8</p>
<p>1 pursuant to Public Resource Code Section 2 21080.27(a), Paragraph 1.</p> <p>3 The applicant is seeking three 4 legislative actions as follows: a general plan 5 amendment to the Venice Community Plan and the 6 Certified Venice Land Use Plan to change the land 7 use designation from Open Space and Low Medium II 8 Multifamily Residential to Neighborhood 9 Commercial and a tax amendment to the certified 10 LUP; a Vesting Zone Change and Height District 11 change from OS-1XL-O to (T)(Q)C2-1L-O, and 12 requesting three Developer Incentives; a Specific 13 Plan Amendment to the Venice Coastal Zone Plan to 14 amend the maps and tax to create a new sub-area.</p> <p>15 Further, the project requires a coastal 16 development permit for a development in the dual- 17 permit jurisdiction of the coastal zone, a 18 project permit compliance review for a project 19 located within the Venice Coastal Zone Specific 20 Plan, and a Mello Act compliance review for the 21 demolition of four residential units and the 22 construction of 114 residential units.</p> <p>23 In addition, the (indiscernible) 24 approved a Vesting Tentative Tract Map for the 25 merger and re-subdivision of a 115,647-square-</p> <p style="text-align: right;">Page 7</p>	<p>1 Slide 19 shows the ground floor level 2 of the structure on the east site. This 3 structure features an art studio space that 4 fronts on the Grand Canal. Vehicle access is 5 provided by a two-way driveway located on North 6 Venice Boulevard and South Venice Boulevard.</p> <p>7 Slides 20 and 21 show the second and 8 third floorplans. The residential units wrap the 9 parking garage, which provides 252 parking 10 spaces. A 1,590-square-foot community room is 11 provided on the second floor.</p> <p>12 Slides 22 and 23 provide elevations of 13 the west structure, which feature a 59-foot in 14 height (indiscernible), providing a recreational 15 room with a roof-access structure, resulting in a 16 structure with a maximum height of 67 feet in 17 height. Otherwise, the west structure is 18 generally three stories and 35 feet in height.</p> <p>19 The building facades are clad with stucco 20 intermix with fixed, inoperable windows on level 21 floors and pivot doors on the ground level.</p> <p>22 Slides 24 and 25 provide elevations of 23 the east structure, which is three stories and 35 24 feet in height. The façade fronting the Grand 25 Canal is stepped back to provide variations in</p> <p style="text-align: right;">Page 9</p>

<p>1 the building plane.</p> <p>2 Slides 26 and 27.</p> <p>3 The proposed development provides 5,600</p> <p>4 square feet of open space adjacent to the Grand</p> <p>5 Canal, of which 1,645 square feet is landscaped.</p> <p>6 This open space is open and accessible -- is open</p> <p>7 and accessible to the general public. In</p> <p>8 addition, the proposed development also provides</p> <p>9 3,285 square feet of landscaped area abutting the</p> <p>10 RD1.5-zoned lots.</p> <p>11 Slide 28.</p> <p>12 The proposed development features an</p> <p>13 increase to coastal access and to improve access</p> <p>14 to the existing public boat launch. The site</p> <p>15 currently maintains a surface lot for the boat</p> <p>16 launch. The proposed project provides new on-</p> <p>17 street loading for the north, on North Venice</p> <p>18 Boulevard, and on-side loading and parking within</p> <p>19 the east structure, and an oversized parking</p> <p>20 space within the west structure. New signage for</p> <p>21 the boat launch parking and designated parking</p> <p>22 spaces are a substantial improvement for access</p> <p>23 to the boat launch over existing conditions.</p> <p>24 Slide 29.</p> <p>25 The proposed project provides a</p> <p style="text-align: right;">Page 10</p>	<p>1 and parking, impact to historic resources, and</p> <p>2 flooding.</p> <p>3 Slide 32.</p> <p>4 One appeal was filed for Case Number</p> <p>5 VTT-82288. Appeal points and staff responses are</p> <p>6 contained in the staff recommendation report.</p> <p>7 This slide provides a summary of the appeal</p> <p>8 points.</p> <p>9 I would like to highlight one issue</p> <p>10 that was raised regarding CEQA. The appellant</p> <p>11 asserts the project is not eligible for an</p> <p>12 exemption from CEQA. Assembly Bill 1197 provides</p> <p>13 three eligibility requirements for a statutory</p> <p>14 exemption from CEQA pursuant to Public Resource</p> <p>15 Code Section 21080.27(b), Paragraph 1. As</p> <p>16 outlined in Exhibit C, Case Number EVN-2018-6667-</p> <p>17 SE, the project meets the definition of</p> <p>18 supportive housing outlined in Health and Safety</p> <p>19 Code Section 50675.14, and the requirements</p> <p>20 contained in Government Code Section 65651. In</p> <p>21 addition, the project is funded by Measure 8.</p> <p>22 In conclusion, staff recommends that</p> <p>23 the Planning Commission deny the appeal and</p> <p>24 sustain the deputy (indiscernible) decision to</p> <p>25 approve Vesting Tentative Tract Map Number ATT-</p> <p style="text-align: right;">Page 12</p>
<p>1 minimal, five-foot-wide pedestrian access</p> <p>2 easement to access the Short Line bridge and</p> <p>3 esplanade from North and South Venice Boulevards.</p> <p>4 Further, the landscaped areas adjacent to the</p> <p>5 pedestrian easements are recreational areas that</p> <p>6 are open and accessible to the general public.</p> <p>7 New signage, landscaped areas, and commercial</p> <p>8 uses would activate this segment of the Grand</p> <p>9 Canal.</p> <p>10 Slide 30 shows a rendering of the open</p> <p>11 space and improvements adjacent to the Grand</p> <p>12 Canal.</p> <p>13 Slide 31 shows a rendering of the</p> <p>14 project site looking west from South Venice</p> <p>15 Boulevard.</p> <p>16 Slide 32 provides a summary of the</p> <p>17 comments received to date. Staff has received</p> <p>18 over 1,000 letters in opposition to the proposed</p> <p>19 project, and over 2,000 letters in support, as</p> <p>20 well as 96 comments during the joint public</p> <p>21 hearing. The issues raised include the loss of</p> <p>22 open space in the coastal zone, the need to</p> <p>23 prepare an environmental impact report, impact to</p> <p>24 coastal access, neighborhood compatibility, the</p> <p>25 over-concentration of supportive housing, traffic</p> <p style="text-align: right;">Page 11</p>	<p>1 82288, and determine, based on the whole of the</p> <p>2 administrative record, that the project is</p> <p>3 statutorily exempt from CEQA. And staff</p> <p>4 recommends that the City Council -- excuse me.</p> <p>5 Staff recommends that the City Planning</p> <p>6 Commission approve and recommend that the City</p> <p>7 Council and mayor approve a General Plan</p> <p>8 amendment, Vesting Zone change and Height</p> <p>9 District change, and Specific Plan amendment.</p> <p>10 Further, staff recommends the approval</p> <p>11 of the coastal development permit, project permit</p> <p>12 compliance review, Mello Act compliance review,</p> <p>13 and site plan review, and that the commission</p> <p>14 adopt the conditions of approval and findings,</p> <p>15 with a technical change to remove Condition</p> <p>16 Number 46, which imposes an expiration period</p> <p>17 that does not apply to the proposed entitlements.</p> <p>18 Thank you very much. This concludes my</p> <p>19 presentation, and staff is available for</p> <p>20 questions.</p> <p>21 PRESIDENT SAMANTHA MILLMAN: Thank you</p> <p>22 so much. At this time, do we have any technical</p> <p>23 questions from commissioners for staff? Seeing</p> <p>24 none, just quickly, if you have your hand up</p> <p>25 right now and you are a member of the public, I</p> <p style="text-align: right;">Page 13</p>

<p>1 am going to politely lower your hand. We will  2 take public speakers after the appellant and  3 applicant have presented. We're going to take  4 all of the opponents at once, and then all of the  5 supporters at once, and we're limiting the time  6 to two hours, one hour for each side. So, please  7 hold your hands for now, and I promise to let you  8 know when it's time. Again, I'm lowering all  9 hands for public speakers at this time.</p> <p>10 Our appellant, or appellant's  11 representative, is Jamie Hall. Jamie, welcome.  12 Please let me know how much time you need. Do we  13 have Jamie with us? Is someone from the  14 commission office staff available to confirm  15 whether or not we have Jamie?</p> <p>16 IRENE GONZALEZ: Hi, this is Irene, for  17 the record. It looks like he --</p> <p>18 JAMIE HALL: This is Jamie Hall. I  19 figured out how to unmute myself.</p> <p>20 IRENE GONZALEZ: Thanks. Okay.</p> <p>21 PRESIDENT SAMANTHA MILLMAN: Great.</p> <p>22 JAMIE HALL: Okay. Well, first of all,  23 how long should I plan -- am I going to be given?  24 I just want to make sure that I get that straight  25 first.</p> <p style="text-align: right;">Page 14</p>	<p>1 record in this case.</p> <p>2 The proposed project includes uses that  3 do not meet the definition of supportive housing,  4 and are thus not eligible for the statutory  5 exemption. Just because these uses share a site  6 with a supportive housing function does not make  7 them exempt from CEQA evaluation. If they were  8 located offsite, they would clearly be subject to  9 CEQA review.</p> <p>10 The city cannot approve the VTT without  11 first proceeding with the required environmental  12 review required under CEQA, in this case, a full  13 environmental impact report. This commission  14 should note that the city was indeed preparing an  15 EIR for this project and has conducted an initial  16 study, in 2018, that showed significant  17 environmental impacts to a variety of resource  18 categories, including aesthetics, air quality,  19 biological resources, cultural resources, geology  20 and soils, greenhouse gas emissions, hazards and  21 hazardous waste, hydrology, water quality, land  22 use, planning, noise, public services,  23 recreation, transportation, traffic, tribal  24 cultural resources, utilities and service  25 systems, and mandatory findings of significance.</p> <p style="text-align: right;">Page 16</p>
<p>1 PRESIDENT SAMANTHA MILLMAN: How much  2 time do you need?</p> <p>3 JAMIE HALL: May I ask for five  4 minutes?</p> <p>5 PRESIDENT SAMANTHA MILLMAN:  6 Absolutely. Take five minutes.</p> <p>7 JAMIE HALL: Okay, great. Thank you so  8 much.</p> <p>9 Good afternoon. My name is Jamie Hall.  10 I'm a land use and environmental attorney with  11 Channel Law Group. I'm appearing today on behalf  12 of Venice Vision in support of the appeal of the  13 Vesting Tentative Tract. In a nutshell, the city  14 cannot make the required findings to approve the  15 VTT under the government code, and therefore, the  16 appeal must be granted.</p> <p>17 First, it must be emphasized that this  18 project is not eligible for a statutory exemption  19 under AB 1197. In order to be eligible for such  20 an exemption, the project must meet all of the  21 criteria set out in the statute, and it simply  22 doesn't. My client has carefully explained this  23 to both city staff processing the VTT, and the  24 deputy advisory agency, in lengthy, exhaustive  25 letters that are now part of the official public</p> <p style="text-align: right;">Page 15</p>	<p>1 Again, the city conducted an initial  2 study and determined every single one of those  3 environmental resource categories was potentially  4 significant. And even if this project were  5 exempt from CEQA, which it's not, the government  6 code nonetheless requires environmental analysis  7 for the approval of a Vesting Tentative Tract.</p> <p>8 One of the required findings under the  9 government code for a VTT is that, "that the  10 design of the subdivision or the proposed  11 improvements are not likely to cause substantial  12 environmental damage, or substantially and  13 avoidably injure fish or wildlife, or their  14 habitats." The city, in this case, takes the  15 position that the statutory exemption removes the  16 requirement to evaluate and mitigate the  17 environmental impacts of this project. This is  18 wrong.</p> <p>19 In Topanga Association for a Scenic  20 Community versus County of Los Angeles, the Court  21 stated as follows: Appellants argue that  22 elimination of their CEQA causes of action does  23 not foreclose an environmental challenge to the  24 approval of the project, because the Subdivision  25 Map Act provides for environmental impact review,</p> <p style="text-align: right;">Page 17</p>

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<p>1 separate from and independent of the requirements 2 of CEQA. We agree. The finding required is in 3 addition to the requirements for the preparation 4 of an environmental impact report or a negative 5 declaration, pursuant to CEQA. So, I know -- you 6 have to consider the environmental impacts of 7 this project in order to make the required 8 findings under the government code. 9 The city also cannot make the other 10 required findings mandated by the government 11 code. I will go through these quickly. 12 First, the project itself, and the 13 project design, is not consistent with applicable 14 general and specific plans. The proposed project 15 is not consistent with the zoning, the general 16 plan designation, the existing Venice Community 17 Plan, the existing Venice Coastal Zone Specific 18 Plan, or the existing certified Venice Local 19 Coastal Program Land Use Plan. The proposed 20 project thus constitutes spot zoning. 21 Second, the design of the subdivision 22 is likely to cause serious public health 23 problems. My client commissioned a detailed 24 screening-level health risk assessment, prepared 25 by a reputable environmental consulting firm,</p> <p style="text-align: right;">Page 18</p>	<p>1 PRESIDENT SAMANTHA MILLMAN: Time. 2 JAMIE HALL: Okay. Well, in sum, the 3 appeal should be granted because the city cannot 4 make the required findings required in the 5 government code. Thank you for your time. 6 PRESIDENT SAMANTHA MILLMAN: Thank you. 7 We will now hear from the applicant's 8 representative, DJ Moore. DJ, I know you also 9 want to present the project itself, so you can 10 have five minutes to address the appeal, and how 11 much additional time do you need to present the 12 project? 13 DJ MOORE: Good afternoon, President 14 Millman. I think we'd request actually 15 -- can 15 we do 15 minutes combined, and we'll just do it 16 all at once? 17 PRESIDENT SAMANTHA MILLMAN: Yes. 18 Let's do 15 minutes combined, as long as you're 19 mindful to only spend five minutes addressing the 20 appeal points. 21 DJ MOORE: Absolutely. Absolutely. 22 And one other question: Can we reserve time for 23 rebuttal as well, at this moment in time? 24 PRESIDENT SAMANTHA MILLMAN: As a rule, 25 we don't do rebuttal at CPC.</p> <p style="text-align: right;">Page 20</p>
<p>1 which concluded that the project will result in 2 an excessive cancer risk to adults, children, and 3 infants, and during the third trimester of 4 pregnancy at the maximally exposed individual 5 resident, located approximately 100 meters away. 6 Finally, the site is not physically 7 suitable for the type and proposed density. The 8 proposed project would introduce permanent 9 supportive housing in an area subject to numerous 10 hazards. The project site would be subject to 11 flooding as a result of sea level rise, in 12 combination with storm events. Even the sea 13 level rise report for the project, prepared by 14 the applicant, acknowledges that the project 15 buildings would be subject to floating -- 16 flooding -- when it exceeds six feet. And there 17 is the potential for sea level rise over the life 18 of the project to be 5.6 to 6.15 feet. 19 Last paragraph here: This commission 20 should be aware that FEMA issued new flood hazard 21 maps on April 12, 2021. These maps show that the 22 building sits squarely in a special flood hazard 23 area designated Zone AE-EL8. This means that the 24 project is going to have to be further elevated, 25 per the International Building Code.</p> <p style="text-align: right;">Page 19</p>	<p>1 DJ MOORE: Okay. 2 PRESIDENT SAMANTHA MILLMAN: Sorry. 3 DJ MOORE: No worries. No worries. 4 All right. Bear with me just one second. We do 5 have an applicant presentation. I just need to 6 get it loaded. Is it up? Oh, sorry. President 7 Millman, is it up? I'm sorry, it's hard for me 8 to -- 9 PRESIDENT SAMANTHA MILLMAN: It is. We 10 see it. 11 DJ MOORE: All right. Fantastic, thank 12 you so much. Good morning, commissioners. DJ 13 Moore of Latham &amp; Watkins. I'm here today with 14 my law partner, Beth Gordie. We're pro bono 15 counsel to the applicants. This project has a 16 lot of history, and we look forward to presenting 17 it to you. We're also here with other members of 18 the Reese Davidson Community Project applicant 19 team, including Eric Owen Moss Architects, and 20 the nonprofit applicants of this important 21 housing development, Hollywood Community Housing 22 and Venice Community Housing. 23 As the commission is well aware, the 24 city is in the middle of an unprecedented housing 25 crisis. To help address it, the city spearheaded</p> <p style="text-align: right;">Page 21</p>

<p>1 the Affordable Housing Opportunities Site program  2 several years ago to identify underutilized sites  3 -- apologies, I'm not sure if my slides are  4 advancing -- okay, to identify city-owned sites  5 that could be transformed into permanent  6 supportive housing. The project is a 2.65-acre  7 surface parking lot in Venice that is one of the  8 sites the city selected.</p> <p>9 The applicant team developed a  10 proposal that was selected in the RFQ process.  11 That initial proposal has been modified, through  12 an over three-year community outreach process, to  13 become what is before you today. As confirmed in  14 the staff report and in our submittals, it is  15 exactly the type of affordable development that  16 the legislature intended to exempt from CEQA  17 under AB 1197, and it satisfies the statute's  18 requirements.</p> <p>19 The initial study that the city  20 prepared in 2017 did not find significant  21 environmental impacts, as was contended by the  22 appellant. It disclosed areas that would be  23 studied in a potential EIR. However, the  24 legislature's adoption of AB 1197, which applies  25 to supportive housing projects in the city of Los</p> <p style="text-align: right;">Page 22</p>	<p>1 floor retail, art studio, and café uses, and new  2 landscaping and open space along the canal that  3 will bring the community into the project and  4 actually make it an integrated part of the  5 surrounding neighborhood.</p> <p>6 The project also includes converting an  7 existing historic vehicle bridge over the canal  8 to pedestrian use only, which will activate and  9 help preserve it for the long term. And the  10 project engages its surroundings on all fronts.  11 It is in no way insular or closed off.</p> <p>12 Most importantly, the project will  13 provide 136 supportive housing units, 68 of which  14 will be designated for residents experiencing  15 homelessness. And the project will include the  16 necessary suite of on-site supportive services,  17 including mental and physical health experts,  18 along with case managers, to ensure successful  19 outcomes. The square footage designated for  20 these services exceeds AB 1197's requirements.</p> <p>21 Studies of the existing parking lot on  22 this site show that it is underutilized during  23 most days of the year, with peak uses on summer  24 weekends and on holidays. In addition to 196  25 replacement parking spaces for what's there</p> <p style="text-align: right;">Page 24</p>
<p>1 Angeles, confirmed that no EIR is required for  2 this project.</p> <p>3 From a planning perspective, this site  4 has two complicating factors. It's a public  5 beach parking lot, so the city required that any  6 project must replace the existing public parking.  7 And it's bisected by a degraded segment of the  8 Venice Grand Canal.</p> <p>9 PRESIDENT SAMANTHA MILLMAN: I am sorry  10 to interrupt you. Your slides -- your slides are  11 not advancing.</p> <p>12 WOMAN 2: Yeah, Caroline and I agree.</p> <p>13 JAMIE HALL: All right. Sorry about  14 that. Thank you.</p> <p>15 PRESIDENT SAMANTHA MILLMAN: Thank you.</p> <p>16 JAMIE HALL: Thank you for pointing  17 that out. I appreciate it. Can you see the  18 slide now? Maybe I can just keep it in the --  19 I'll turn it this way. I apologize. All right.  20 Okay. All right. Sorry about that. Thank you  21 very much. Okay.</p> <p>22 The project's (indiscernible) landmark  23 architecture effectively screens the proposed  24 parking structures, provides a diversity of forms  25 and textures, and includes appropriate ground-</p> <p style="text-align: right;">Page 23</p>	<p>1 today, the project is providing 27 additional  2 beach impact parking spaces and 27 additional  3 surplus parking spaces for the public,  4 substantially increasing what it available to the  5 public today.</p> <p>6 These public spaces will be provided in  7 a separate structure that DOT will continue to  8 operate on the east part of the site, which will  9 be a vast improvement from existing conditions,  10 where nothing is automated and attended  11 transactions can cause queuing out onto the  12 surrounding streets. DOT is still evaluating  13 whether to build a standard structure or one with  14 lifts that can be operated with valets on peak  15 days. But either way, the structure can  16 accommodate feasibly the number of proposed  17 spaces.</p> <p>18 Also, since the public is not currently  19 provided parking access to the existing kayak  20 boat launch into Venice Grand Canal, the DOT  21 structure will also include two parking spaces  22 where kayakers can unload and access that boat  23 launch. A DOT representative is here today to  24 answer any questions the commission may have.  25 We believe we have fully responded to</p> <p style="text-align: right;">Page 25</p>

7 (Pages 22 - 25)

<p>1 all of the comments from project's opponents in 2 our submission and believe that the record 3 supports the staff's recommendation. Now I will 4 pass the presentation over to Eric Owen Moss, to 5 describe how he and his team developed the vision 6 for this site.</p> <p>7 ERIC OWEN MOSS: Good morning. My name 8 is Eric Owen Moss. Pleasure to be here and 9 explain the design concept of this very important 10 project.</p> <p>11 To begin with, we're clearly admirers 12 of Venice, its pedigree, its history, its poetry, 13 its music, its art, and its canals. And the 14 intention of the project is to learn from that 15 pedigree, to join it, and to add to it.</p> <p>16 (indiscernible) -- Pacific on the west, 17 North Venice on the north, South Venice on the 18 south, Dell on the east -- were extremely 19 cognizant of the scale, shape, size, form, order 20 of the buildings that surround this site, and our 21 objective in the project is to produce a series 22 of buildings which are consistent with the 23 buildings that surround our area.</p> <p>24 The site, as previously presented, 25 parking area image above, canal area image below.</p> <p style="text-align: right;">Page 26</p>	<p>1 conceptually two building blocks, east and west, 2 surrounding the canal area with a historic 3 bridge. And then, the removal of substantial 4 pieces of those blocks, particularly on the 5 south, in order to let the sun into the area. 6 And finally, the slide below, the completed 7 elevation, the historic bridge, and the redesign 8 of the area surrounding the canal. This is a 9 view of the canal, as completed, looking south 10 and east, art studio on the left, terraces, 11 landscape, seating, café on the west, or the 12 right.</p> <p>13 This is the Pacific Avenue venue, 14 again, substantial setbacks area welcoming 15 pedestrians, street, flowers at grade and on the 16 decks. And then, an increased height element at 17 the corner of Pacific and North Venice, 18 consistent with the traditions historically in 19 the neighborhood in the Venice area for 20 signifying a special moment or an architectural 21 event on a critical corner in the neighborhood.</p> <p>22 Next, the café on the west side of the 23 redone surrounding canal area facing east and 24 south, adjoining the Arts Walk, the arts studio, 25 facing west on the east side of the canal. An</p> <p style="text-align: right;">Page 28</p>
<p>1 We're convinced we can improve on the current 2 circumstances.</p> <p>3 This is the site on the ground level.</p> <p>4 The emphasis is on landscape, on benches, on 5 gathering areas. The site itself, within its 6 perimeters, is set back substantially to allow 7 the public to enter and to walk, courts. There's 8 retail space, the café, art studios, ground 9 level.</p> <p>10 Next, the two parking components 11 previously mentioned, the one on the west for the 12 project; the one on the east is for the public. 13 Then the units that surround the parking garage 14 with an intermediate pedestrian circulation 15 between those two organizational elements. Then 16 the (indiscernible) tiers, landscape, landscape 17 on top, landscape at grade, and essentially in 18 concept, the park is sandwiched between a 19 landscape above and a landscape environment at 20 grade.</p> <p>21 Again, a view of the canal and the 22 surrounding area looking south. And then, the 23 design solution we're proposing for that is a 24 sequence of three images, top to bottom, on the 25 right. So the first image on the top illustrates</p> <p style="text-align: right;">Page 27</p>	<p>1 important diagram illustrating the public and 2 public access to the area surrounding the canal 3 from North Venice at the top, from South Venice 4 at the bottom, over the bridge, along the canal, 5 over and under on either side. Again, emphasis 6 on public and pedestrian access.</p> <p>7 Strategically, what we've done is not 8 simply to build a single or simple building 9 element or façade, but to vary the elevations, as 10 was previously mentioned, with texture and with 11 color, but most importantly, to indent the 12 façade, to vary it with a number of stages. You 13 can see on the slide in the image on the left, 14 the ground level, which is a court for art and 15 the artists in studios. You can also see the 16 tree a little bit to the right of that, which 17 actually grows up through the roof of the 18 building.</p> <p>19 Giving Arts Walk -- this is on South 20 Venice -- art studio an opportunity to exhibit as 21 Venice history dictates, we feel, bringing arts 22 to the community, bringing community to the arts, 23 canopy above, shielding the walk from the sun. 24 East elevation reduced in height commensurate 25 with the buildings, or the decreased height with</p> <p style="text-align: right;">Page 29</p>



<p>1 the buildings around the area and across the 2 street. Again, substantial setbacks, canopies, 3 landscaping, walking areas, and a bamboo garden 4 to the north.</p> <p>5 And then, (indiscernible) a typical 6 venue for the room with substantial 7 (indiscernible) landscaping -- chairs, tables, 8 gathering areas. Views from the roof 9 (indiscernible) are spectacular, as are the views 10 from the adjacent sites to the building. Again, 11 landscape above, landscape below, a sandwich and 12 landscaped building in between.</p> <p>13 That completes this presentation. I'd 14 like to pass you along to Becky Dennison, who 15 will complete the conversation. Thank you.</p> <p>16 PRESIDENT SAMANTHA MILLMAN: Thank you.</p> <p>17 BECKY DENNISON: Hello, everyone, Becky 18 Dennison with Venice Community Housing. We're a 19 nonprofit community-based affordable and 20 supportive housing developer, as is our partner, 21 Hollywood Community Housing.</p> <p>22 Reese Davidson Community approvals 23 involve the complicated land use changes that 24 you've heard from staff, as well as a complex and 25 amazing design that incorporates so many</p> <p style="text-align: right;">Page 30</p>	<p>1 income folks and communities of color over the 2 last 20 years. In that same 20 years, there were 3 zero 100-percent-affordable new developments 4 created in the neighborhood. And so --</p> <p>5 PRESIDENT SAMANTHA MILLMAN: Time. 6 Sorry.</p> <p>7 BECKY DENNISON: Thank you very much 8 for your time.</p> <p>9 PRESIDENT SAMANTHA MILLMAN: Thank you 10 so much. Okay, at this point, we are going to 11 open up the public testimony for this item. I'm 12 going to start by opening up the public testimony 13 for opponents of the project. So, if you are an 14 opponent of the project, now is your turn to 15 speak. If you are dialing in by phone, please 16 press star, nine. If you are participating via 17 Zoom, please click the raise-hand button. Again, 18 this is for opponents of the project.</p> <p>19 If you have pressed star, nine, you 20 will have one minute to speak. Diego will call 21 out the last three digits of your phone number 22 when it is your turn. Please first state your 23 name clearly, and then proceed with your comment. 24 When you hear a message that states that you are 25 muted, please press star, six to unmute yourself.</p> <p style="text-align: right;">Page 32</p>
<p>1 interrelated components and amenities. With 2 added support, Reese Davidson is an affordable 3 and supportive housing community that provides a 4 key piece of the long-term solution to our city's 5 overwhelming housing crisis.</p> <p>6 Our proposal is the result of more than 7 three years of community engagement, reaching 8 thousands of people with over 100 activities and 9 more than 10 large-scale public events. This 10 informed many aspects of the proposal, included 11 safe engagement of the arts community and 12 formation of (indiscernible). It elevated the 13 voices and ideas of low-income people and 14 resulted in hundreds of supporters within Venice 15 and thousands across the city, who know that we 16 need far more affordable housing development in 17 every community in our city.</p> <p>18 Also, as part of the city's AHOS 19 program, we are advancing the goal of maximizing 20 the use of every publicly-owned piece of land to 21 include affordable housing and contribute to 22 (indiscernible) homelessness. New affordable 23 housing is particularly important as Venice, as a 24 historically diverse and inclusive community that 25 has experienced significant displacement of low-</p> <p style="text-align: right;">Page 31</p>	<p>1 If you're joining us via Zoom today, 2 please click the raise-hand button. Diego will 3 call your name when it is your turn. You will 4 see a prompt that states, the host would like you 5 to unmute. Please click on unmute, state your 6 name for the record, and begin your comments. 7 Again, each speaker will have one minute to 8 speak.</p> <p>9 I'm setting my timer now for one hour, 10 which I will begin as soon as the first speaker 11 begins their comment. We will take one hour of 12 testimony from opponents of the project, followed 13 by one hour of testimony from those in support of 14 the project, and we will begin now. Diego, 15 please begin to call our speakers.</p> <p>16 DIEGO VASQUEZ: Thank you. Diego 17 Vasquez, City Planning. Caller Mike, you have 18 been unmuted. Please unmute.</p> <p>19 MIKE: Hi. Sorry, yeah, Mike, that's 20 me. Okay. Am I on? Can you hear me?</p> <p>21 PRESIDENT SAMANTHA MILLMAN: Yes. 22 Please go ahead.</p> <p>23 MIKE: Okay. So I'd just like to start 24 with, I'm a local resident. I live on North 25 Venice Boulevard, so this is very close to my</p> <p style="text-align: right;">Page 33</p>

<p>1 property. I've lived there since 2001, so I've 2 been a long-term resident.</p> <p>3 But firstly, let me give you a quick -- 4 a (indiscernible) of my background. I was 5 homeless in London, and I did quite well in the 6 music industry, which afforded me to come to 7 America. And in America, when I reached Venice 8 Beach, I immediately adopted a homeless person. 9 I brought him into my house, got him into my 10 home, and rehabilitated him back into society, 11 got in contact with his daughter, and he's back. 12 So I'm that sort of person.</p> <p>13 So I completely oppose this. I'm 14 opposed to it on the scale of it, the 15 disproportion, how it would corrupt our 16 community. It's brutalist architecture. 17 Brutalism architecture, if you google it, was in 18 the 1950s. It was post (indiscernible) 19 industrial. It was institutionalized 20 architecture. And it's now, if you google it, 21 it's the highest suicide rates in England, 22 (indiscernible) mental depression.</p> <p>23 And I will say, the parking issues, oh 24 my God, I'll go on, but --</p> <p>25 PRESIDENT SAMANTHA MILLMAN: Time.</p> <p style="text-align: right;">Page 34</p>	<p>1 above sea level on this site. The entitlements 2 don't address that, the plan doesn't, the report 3 doesn't address that. This is a mess. You've 4 got to fix it.</p> <p>5 PRESIDENT SAMANTHA MILLMAN: Thank you.</p> <p>6 DIEGO VASQUEZ: Next caller, George 7 Francisco, you have been unmuted. Please unmute.</p> <p>8 GEORGE FRANCISCO: Hi, can you hear me?</p> <p>9 PRESIDENT SAMANTHA MILLMAN: Loud and 10 clear. Go ahead.</p> <p>11 GEORGE FRANCISCO: Thank you very much. 12 There are going to be a number of comments 13 addressing a number of the failures of this 14 project. I'm the president of the local chamber 15 of commerce in Venice, and I'd like to speak to 16 the commercial and retail components here, 17 because I'm the definitive expert in Venice of 18 our business development.</p> <p>19 What I can tell you with 100 percent 20 certainty is, these applicants cannot adequately 21 manage what they say that they do, which is to 22 provide housing. I live within 100 yards of one 23 of their disastrous projects. It is a magnet for 24 crime.</p> <p>25 In terms of the commercial component of</p> <p style="text-align: right;">Page 36</p>
<p>1 Sorry. It goes really quickly. I'm sorry, 2 that's your time.</p> <p>3 DIEGO VASQUEZ: Next caller, Christian 4 Reed, you have been unmuted. Please unmute.</p> <p>5 CHRISTIAN REED: I want to note first 6 that we should have a minute to respond on the 7 appeal and a minute to respond on the 8 entitlements.</p> <p>9 I also want to read the professional 10 volunteer program design review notes. Very 11 aggressive, harsh, and bunco-like design for 12 Venice, rejecting surrounding neighborhoods. 13 Project very dormitory-like in expression, or 14 like a large barge come ashore. A looming mass 15 carved by voids and small windows is the design 16 concept. That's the city attorney's -- that the 17 city planning's own architects commenting on this 18 atrocious design.</p> <p>19 I also want to emphasis, AB 1197, you 20 have not investigated it adequately. The funding 21 threshold, they're using money for services, not 22 housing. It must be money for housing.</p> <p>23 Finally, they're ignoring the FEMA 24 report that says, it is more likely than not that 25 there will be flooding in excess of eight feet</p> <p style="text-align: right;">Page 35</p>	<p>1 this project, they will never, ever be 2 successful. They will devolve to the lowest 3 common denominator and repel businesses, and be a 4 drag on the natural and necessary capital 5 investment that sustains Venice and the 6 entrepreneurs and small business people that are 7 here. Other people will speak to other matters. 8 This is a disastrous commercial component for 9 Venice. Thank you.</p> <p>10 PRESIDENT SAMANTHA MILLMAN: Thank you.</p> <p>11 DIEGO VASQUEZ: Andrea, you have been 12 unmuted. Please unmute.</p> <p>13 ANDREA BOCCALETTI: Hello. Thank you. 14 My name is Andrea Boccaletti. I just can't even 15 believe -- first, I want to address the letters, 16 the letters that you say that there's 1,000 in 17 opposition and 2,000 for the project. Let's -- 18 give me a break. Those 2,000 letters are from 19 people that don't live in this community. If you 20 ask everybody here, I'm sure it's in the 90 21 percent range of people against this project.</p> <p>22 You are going to destroy an entire 23 community. I mean, it's just an egregious waste 24 of funds. We should be housing so many more 25 people with this money. The problems with -- the</p> <p style="text-align: right;">Page 37</p>

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<p>1 impact to the coastal access for elderly, for the 2 children in this community, you really -- it's 3 just -- the only people that stand to win with 4 this project are the developers. And let's -- I 5 mean, that's -- it's just absolutely horrific. 6 I hope that, please, vote this project 7 down. We've already -- how many of you have 8 proved already for the city of Venice? Enough. 9 Please, help us. Thank you. 10 PRESIDENT SAMANTHA MILLMAN: Thank you. 11 DIEGO VASQUEZ: Caller CJ Cole, you 12 have been unmuted. Please unmute. 13 CJ COLE: Yes, I'm a long-term 14 resident, a property owner and business owner of 15 30-plus years. And all I can say is that this is 16 an oversized, overpriced project that won't even 17 come into any fruition for probably three to four 18 years, minimum. It will only house 68 homeless 19 people. You know, it just absolutely doesn't 20 make any sense at all. 21 That money should be used somewhere 22 where, you know, you can get a lot for your 23 money. The land should remain open space for the 24 community of Venice. It is our land. It is not 25 your land, it is our land, and we want to keep it</p> <p style="text-align: right;">Page 38</p>	<p>1 times the amount being charged for beach parking 2 in more affluent and less diverse communities. 3 For the cost of this (indiscernible), 4 undersized, and unworkable \$35 million parking 5 garage planned for this project, the city can 6 acquire other sites that accommodate more 7 housing, without the permanent damage to the 8 community. 9 PRESIDENT SAMANTHA MILLMAN: Time. 10 Thank you. 11 DIEGO VASQUEZ: Caller Andrew, you have 12 been unmuted. Please unmute. 13 ANDREW BALES: Yes, thank you. So this 14 is the most disingenuous proposal and staff 15 report I've seen. They just stated that they 16 really care about the Venice community. If you 17 did, why not run through the EIR and show the 18 community that there is an environmental impact? 19 Because you know there is. 20 Number two, this is a massive, massive 21 housing project with no required sober living 22 component or required supportive system. We know 23 what happens in our community when these projects 24 occur, because we've had four of them foisted 25 upon us, with disastrous results. Around them,</p> <p style="text-align: right;">Page 40</p>
<p>1 open space for our future use. Thank you. 2 PRESIDENT SAMANTHA MILLMAN: Thank you. 3 DIEGO VASQUEZ: Caller 524, you have 4 been unmuted. Please unmute on your end. 5 JEFFREY: Hello, my name is Jeffrey 6 (indiscernible). Can you hear me? 7 PRESIDENT SAMANTHA MILLMAN: Loud and 8 clear. 9 JEFFREY: Loud and clear. The Venice 10 median is permanently dedicated as open space to 11 be used for public beach access and recreation. 12 Properties are almost one-half mile long, serving 13 as a gateway to the beach and canals, cutting 14 through the most iconic and historical 15 neighborhoods in Venice. Any development of 16 these properties would cause catastrophic damage 17 to the Venice community and impose a permanent 18 cap and restriction on beach access for city 19 residents who are out of Los Angeles. 20 Plans for this development include 21 permanent increases in the rates charged for 22 Venice Beach parking to levels that low-income 23 and minority residents cannot afford, denying 24 them access to the city's only beach. These 25 charges would start at rates more than three</p> <p style="text-align: right;">Page 39</p>	<p>1 you've seen massive uptick in violent crime, 2 murder, assault with a deadly weapon, robbery, 3 arson, and fire. That's not supposition; that's 4 fact. That's from the police department. 5 Number two, the parking replacement, 6 that is another disingenuous statement. We have 7 a flat lot here for POC beachgoers from the east 8 of our town. It takes them about 10 minutes to 9 get out of their car because of coolers, chairs, 10 disabled people. How on earth are you replacing 11 those with a mechanized valet system that is 12 going to -- 13 PRESIDENT SAMANTHA MILLMAN: Time. 14 ANDREW BALES: -- this is ludicrous, 15 ludicrous. 16 PRESIDENT SAMANTHA MILLMAN: Thank you. 17 DIEGO VASQUEZ: Next caller, Kevin 18 Gallagher, you have been unmuted. Please unmute. 19 KEVIN GALLAGHER: Good afternoon. I am 20 a Venice resident. I have lived here for 30 21 years. I see this as an egregious disrespect to 22 the community surrounding this area. I own a 23 house about three blocks away. I have a 10-year- 24 old son. I have seen parking charges at that lot 25 for up to \$50 per car, so I don't see where this</p> <p style="text-align: right;">Page 41</p>

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<p>1 something that helps out the community.</p> <p>2 And there's obviously -- you have</p> <p>3 \$750,000 per unit to build this thing. I could</p> <p>4 build 10 tiny homes someplace else for \$128,000</p> <p>5 that Garcetti just did in DTLA. Why can't</p> <p>6 something like that be done near here, but not</p> <p>7 right at the beach, for crying out loud?</p> <p>8 And I don't need another restaurant.</p> <p>9 You're going to put beer and wine in there, and</p> <p>10 alcoholics and drug addicts? It just doesn't</p> <p>11 make sense. The streets are not safe for my 10-</p> <p>12 year-old; they're not safe for me. And I thank</p> <p>13 you.</p> <p>14 PRESIDENT SAMANTHA MILLMAN: Thank you.</p> <p>15 DIEGO VASQUEZ: Gene (indiscernible),</p> <p>16 you have been unmuted. Please unmute. Gene</p> <p>17 (indiscernible), you have been --</p> <p>18 GENE: This project is just way out of</p> <p>19 control in terms of costs. And it is -- first of</p> <p>20 all, it's extremely ugly. I, from personal</p> <p>21 experience, have been living by the beach for a</p> <p>22 long time, and on the weekends, the sidewalks are</p> <p>23 basically impossible, there are so many people.</p> <p>24 To try to reduce parking, reduce the sidewalk</p> <p>25 space, and put in this massive structure in the</p> <p style="text-align: right;">Page 42</p>	<p>1 the tens of thousands of LA families who come to</p> <p>2 Venice Beach during the summer and the holidays</p> <p>3 from the mid-city, east side, south central, and</p> <p>4 the Valley?</p> <p>5 How is giving our taxpayer-owned land</p> <p>6 to a developer benefit our city, when it will</p> <p>7 directly restrict access to the beach for</p> <p>8 everyone in LA, in order to provide only 68 units</p> <p>9 of housing for the homeless at a cost of over</p> <p>10 \$1,500 per square foot?</p> <p>11 Please deny this project. There are</p> <p>12 far better, more cost-effective ways to use our</p> <p>13 tax dollars actually -- to actually provide</p> <p>14 family-friendly, affordable, and homeless</p> <p>15 housing. Thank you.</p> <p>16 PRESIDENT SAMANTHA MILLMAN: Thank you.</p> <p>17 DIEGO VASQUEZ: Next caller, caller</p> <p>18 Marjorie Weitzman, you have been unmuted. Please</p> <p>19 unmute.</p> <p>20 MARJORIE WEITZMAN: Hi, Marjorie</p> <p>21 Weitzman, Venice resident, strongly opposed to</p> <p>22 the project. Mike (indiscernible) gave up this</p> <p>23 surface parking lot to developers, falsely</p> <p>24 claiming the open space is underutilized. Most</p> <p>25 weekends, this lot is packaged -- is packed with</p> <p style="text-align: right;">Page 44</p>
<p>1 middle of a beach town, which is already</p> <p>2 inundated with other projects like this for --</p> <p>3 this one's only going to house 68 homeless</p> <p>4 people. This is not even going to make a dent.</p> <p>5 It is basically for profit for the developer.</p> <p>6 It does not fit in with the Venice</p> <p>7 architecture. It is horrid. It is in a flood</p> <p>8 zone. I strongly, strongly oppose this.</p> <p>9 PRESIDENT SAMANTHA MILLMAN: Thank you.</p> <p>10 DIEGO VASQUEZ: Next caller, Ellen</p> <p>11 Fallon, you have been unmuted. Please unmute.</p> <p>12 ELLEN FALLON: I'm a long-term property</p> <p>13 owner and resident for over 45 years. This</p> <p>14 project is typical of this developer's other</p> <p>15 projects in Venice. VCHD always demands</p> <p>16 exemptions to height setback and open space for</p> <p>17 the mixed-use projects they build in Venice,</p> <p>18 arguing that homeless housing gives them a free</p> <p>19 pass.</p> <p>20 You need to stop allowing this</p> <p>21 developer to ignore our zoning regulations. This</p> <p>22 is why our neighborhood council unanimously</p> <p>23 opposed this project not once, but twice.</p> <p>24 Where's the racial equity and social justice in</p> <p>25 removing affordable beach access and parking for</p> <p style="text-align: right;">Page 43</p>	<p>1 hard-working Angelinos wanting to visit Venice</p> <p>2 Beach.</p> <p>3 The massive project straddles the</p> <p>4 historic Grand Canal and will be a barrier to the</p> <p>5 beach, blocking both access and visual siting.</p> <p>6 Construction will be intrusive, with no promised</p> <p>7 environmental review. With the proper CEQA</p> <p>8 study, this project would be dead in the water.</p> <p>9 The impact of the build will severely</p> <p>10 affect the environmentally sensitive coastal area</p> <p>11 of the Venice canals and community. The zoning</p> <p>12 laws meant to safeguard our community are being</p> <p>13 altered to accommodate the project, rather than</p> <p>14 the other way around. Developers are forcing</p> <p>15 massive square pegs through costly round holes.</p> <p>16 It just doesn't work.</p> <p>17 This is not a solution for building</p> <p>18 much-needed housing. This is the problem. Thank</p> <p>19 you.</p> <p>20 PRESIDENT SAMANTHA MILLMAN: Thank you.</p> <p>21 DIEGO VASQUEZ: Next caller, Patrick</p> <p>22 Taylor, you have been unmuted. Please unmute.</p> <p>23 PATRICK TAYLOR: Hi, Patrick Taylor, a</p> <p>24 Venice resident. I strongly oppose this project.</p> <p>25 For 140 units, you will be denying generations of</p> <p style="text-align: right;">Page 45</p>

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<p>1 Angelinos the enjoyment of bringing their 2 families to the beach. The parking lot design is 3 a joke and totally unacceptable for beach access. 4 Please stop Mike (indiscernible)'s 5 monster and the greedy, greedy developers 6 involved. Thank you. 7 PRESIDENT SAMANTHA MILLMAN: Thank you. 8 DIEGO VASQUEZ: Next caller, Lenore, 9 you have been unmuted. Please unmute. 10 LENORE: There we go. Hi, I'm Lenore 11 (indiscernible). I've lived in Venice for the 12 last seven years, but I've been visiting Venice 13 since 1981, when I lived in areas like Whittier, 14 East LA, and Hollywood, and I used that parking 15 lot to access Venice. 16 My main complaint, however, is the 17 hideous appearance of this thing. I'm strongly, 18 strongly in favor of permanent supportive housing 19 in my neighborhood -- I am not a NIMBY -- but not 20 if it looks like a prison. This development has 21 a twin in the downtown Las Vegas jail. The 22 trimless windows set in ugly stucco, and I mean, 23 I was astonished to hear that they were 24 consistent with the history of Venice. Are you 25 kidding me? You can drop that in any exurb, and</p> <p style="text-align: right;">Page 46</p>	<p>1 people, 75 people, does not help the 250 people 2 on the beach currently. There are actually five 3 people living right on Pacific and Venice in 4 between those medians, so I don't know when those 5 pictures were taken, but they surely weren't 6 taken over the last couple of months. 7 These five people living right there 8 won't have access to that housing. The 250 9 people living on the beach won't have access to 10 that housing. The 154 people living inside the 11 Bridge Home down the street on the MTA lot won't 12 have access to that housing. 13 This has been spun to us time and time 14 again, that this will help alleviate the actual 15 homeless problem in Venice. But after every 16 project is created, we're told that, no, homeless 17 from other parts of the town are going to be 18 coming and moving into these units. 19 We need a solution for this land to 20 take 250, 500 people, and 750 people off the 21 street, not 60. Thank you. 22 PRESIDENT SAMANTHA MILLMAN: Thank you. 23 DIEGO VASQUEZ: Next caller, Ron 24 Robinson, you have been unmuted. Please unmute. 25 RON ROBINSON: Hi, thank you very much.</p> <p style="text-align: right;">Page 48</p>
<p>1 people would just say, what prison is this? 2 It's just, the design is so ugly. It's 3 out of scale, and I really don't think it merits 4 waiving four hardworking planning groups that 5 created our zoning regulations for having 6 livability. To throw those aside for this, I 7 think, is beyond wrong. Thank you. 8 PRESIDENT SAMANTHA MILLMAN: Thank you. 9 DIEGO VASQUEZ: Next caller, Ryan T., 10 you have been unmuted. Please unmute. 11 RYAN TILLIS: Hi, Ryan Tillis. Thank 12 you for taking the time this morning to hear 13 about this, but, you know, we actually have a 14 real homelessness crisis in Venice. I don't know 15 the last time anybody's walked around, but I live 16 right on Pacific and 27th. I'm sure we'll hear 17 the police chopper or a fire truck going by 18 pretty soon, since they come by pretty often. 19 We need to actually use this land to 20 affect homelessness. 21 PRESIDENT SAMANTHA MILLMAN: I'm sorry, 22 but can I interrupt you for one second? Staff, 23 can we please get the timer moving? Please 24 continue, Ryan. 25 RYAN TILLIS: Thank you. Housing 68</p> <p style="text-align: right;">Page 47</p>	<p>1 I'm Ron Robinson. Thank you, commissioners, and 2 thank you, city attorney and staff, for allowing 3 me to speak. 4 I am a resident of the canals for over 5 30 years. I took my son, when he was three and 6 four years old, to the little park at the end 7 here that is now being taken as part of this 8 project, because they needed more open space and 9 parks, so they took the little children's park to 10 be on. 11 This project is not the scale, it's not 12 the look, it's not part of Venice. We have been 13 sold a bill of goods. Along the way, we've asked 14 questions and gotten nothing but incorrect 15 answers. And then, now, they've changed the -- 16 changed the name of this from homeless housing to 17 housing. It's very clever the way this has all 18 changed. 19 This just doesn't keep within the 20 atmosphere of what we do. And I remember when 21 Commissioner Dake Wilson started, and she said, 22 these things of open space and atmosphere 23 (indiscernible). Thank you. 24 PRESIDENT SAMANTHA MILLMAN: Thank you. 25 DIEGO VASQUEZ: Next caller, Darryl</p> <p style="text-align: right;">Page 49</p>

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<p>1 DuFay, you have been unmuted. Please unmute.</p> <p>2 DARRYL DUFAY: Thank you very much for</p> <p>3 this time. My name's Darryl DuFay. I've lived</p> <p>4 on the Grand Canal for 42 years. This project's</p> <p>5 just right down for me.</p> <p>6 I heard the word from the developers,</p> <p>7 outreach. What an outrage. I attended its --</p> <p>8 we're in our fifth year with this project. I've</p> <p>9 attended meeting after meeting after meeting. It</p> <p>10 was more like a throttling.</p> <p>11 They never allowed the community to</p> <p>12 have input. They said we would -- we'd have some</p> <p>13 on design. No. We had some on size? No. What</p> <p>14 we are is a Venice community full of expendables,</p> <p>15 and I am so upset with this -- with the two</p> <p>16 developers coming to tell you all they did.</p> <p>17 And did you notice it said 500 -- 2,000</p> <p>18 letters? But only 530 were from Venice. Thank</p> <p>19 you.</p> <p>20 PRESIDENT SAMANTHA MILLMAN: Thank you.</p> <p>21 DIEGO VASQUEZ: Next caller, caller</p> <p>22 Mark Stanley, you have been unmuted. Please</p> <p>23 unmute.</p> <p>24 MARK STANLEY: Hi, this is Mark</p> <p>25 Stanley. Can you hear me okay?</p> <p style="text-align: right;">Page 50</p>	<p>1 participated and witnessed, over the past few</p> <p>2 years, every homeless housing project that has</p> <p>3 come before the city and come before this</p> <p>4 commission has been approved. You've got Rose</p> <p>5 Avenue, Navy, Lincoln Apartments, Marion Place,</p> <p>6 Ramada Inn, (indiscernible) Yard. That's 265</p> <p>7 units, plus Bridge Housing of 154 beds, which now</p> <p>8 is going to be turned into like another monster</p> <p>9 on the MTA lot. This is all in three square</p> <p>10 miles.</p> <p>11 You guys are creating a containment</p> <p>12 zone in Venice. This is illegal. It's against</p> <p>13 city charter, it's against zoning laws. You are</p> <p>14 -- you continue to put these projects, and you</p> <p>15 don't listen to the people, and I fear that this</p> <p>16 is just going to be rubber-stamped through.</p> <p>17 Please keep open space. Do not create</p> <p>18 a new sub-area for this project, just so they can</p> <p>19 get away and change all the zoning laws that we</p> <p>20 fought so hard to protect to save our community.</p> <p>21 PRESIDENT SAMANTHA MILLMAN: Thank you.</p> <p>22 DIEGO VASQUEZ: Next caller, James, you</p> <p>23 have been unmuted. Please unmute. James, you</p> <p>24 have been unmuted. Please unmute.</p> <p>25 JAMES MUREZ: Did that work? Hello?</p> <p style="text-align: right;">Page 52</p>
<p>1 DIEGO VASQUEZ: Yes, proceed.</p> <p>2 MARK: Yeah. I'm a 25-year resident of</p> <p>3 Venice. I live close to this thing. And, as I</p> <p>4 was looking at Ira Brown showing the pictures of</p> <p>5 this, you know, ugly, huge monstrosity -- amazing</p> <p>6 that he kept a straight face through the whole</p> <p>7 thing -- it called to mind the great Hippodamus,</p> <p>8 the father of city planning. He must be rolling</p> <p>9 in his grave right now.</p> <p>10 Why is this building, already known as</p> <p>11 the barge or the monster, being clumped right</p> <p>12 into the middle of a highly congested, historic</p> <p>13 seaside resort? Why is it being placed in a</p> <p>14 tsunami zone, and now a FEMA-rated high-risk</p> <p>15 ocean flood area? Why are the Coastal Commission</p> <p>16 directions for beach access and community</p> <p>17 character being ignored?</p> <p>18 This is not a project any city planner</p> <p>19 would want to -- on their resume. Do not rubber-</p> <p>20 stamp this; stamp it out.</p> <p>21 PRESIDENT SAMANTHA MILLMAN: Thank you.</p> <p>22 Staff, can you please call the next speaker?</p> <p>23 DENISE: Denise (indiscernible) for the</p> <p>24 record. Caller Shawn, you're unmuted.</p> <p>25 SHAWN: Yes, hi. Thank you. I've</p> <p style="text-align: right;">Page 51</p>	<p>1 PRESIDENT SAMANTHA MILLMAN: Please go</p> <p>2 ahead.</p> <p>3 JAMES MUREZ: Yeah, okay. My name is</p> <p>4 James Murez. I'm a 35-year resident of Venice.</p> <p>5 In 2012, Councilman Rosenthal, as chairman of the</p> <p>6 Department of -- excuse me, the Committee of</p> <p>7 Transportation for the City of Los Angeles,</p> <p>8 amended the 2035 mobility transportation plan and</p> <p>9 funded an in-lieu parking study for the area of</p> <p>10 Venice. The proposed project has intentionally</p> <p>11 avoided responding to the recommendations --</p> <p>12 PRESIDENT SAMANTHA MILLMAN: Hi.</p> <p>13 JAMES MUREZ: -- of this --</p> <p>14 PRESIDENT SAMANTHA MILLMAN: Fine. How</p> <p>15 are you?</p> <p>16 JAMES MUREZ: Hello?</p> <p>17 PRESIDENT SAMANTHA MILLMAN: Sorry</p> <p>18 about that. Please continue.</p> <p>19 JAMES MUREZ: Oh, okay. Do I get the</p> <p>20 extra time that it's taken to -- okay, we'll</p> <p>21 refocus. The proposed project has intentionally</p> <p>22 avoided responding to the recommendations and</p> <p>23 conclusions of this study, which documents a huge</p> <p>24 potential financial gain for the city, if the --</p> <p>25 if this site was developed as a solution for the</p> <p style="text-align: right;">Page 53</p>

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<p>1 parking demands for residents, businesses, and 2 visitors in this region of Venice. That study 3 hasn't been recognized.</p> <p>4 I also want to point out that the 5 sidewalk widths, which are critical to pedestrian 6 access to the beach, are currently 15 feet under 7 the 2035 mobility transportation plan for this 8 section of Venice.</p> <p>9 PRESIDENT SAMANTHA MILLMAN: That's 10 your time. Thank you.</p> <p>11 JAMES MUREZ: Thank you.</p> <p>12 DIEGO VASQUEZ: Next caller, caller 13 Alley Bean, you have been unmuted. Please 14 unmute.</p> <p>15 ALLEY BEAN: Hi, Alley Bean here, 30- 16 year resident of Venice; my husband, actor Orson 17 Bean, a 52-year resident. I, along with Darryl, 18 who I just heard speak, am so dismayed about the 19 outreach with this project. There are so many 20 things wrong with it, and we've really, sincerely 21 tried to work with the developer, and just 22 constantly were against a brick wall that we had 23 to agree to disagree, which is not a way to do 24 outreach.</p> <p>25 I'm going to stick to the money part,</p> <p style="text-align: right;">Page 54</p>	<p>1 (indiscernible) Venice canals and designated in 2 the Land Use Plan for future expansion of 3 visitor-serving parking and recreation use. This 4 loss of dual coastal zone open space is not in 5 the greater public interest.</p> <p>6 Also, the city specifically required 7 any project at the site to comply with all 8 coastal regulations, and that requirement has 9 been breached, as this project not only does not 10 comply with the coastal regulations, it seeks 11 multiple exceptions to the law, and even plan 12 amendments that constitute less restrictive spot 13 zoning, which is in violation of city charter.</p> <p>14 The city council was misled, and I do 15 not believe that if they had been provided all 16 the facts, that they would have approved this 17 site.</p> <p>18 PRESIDENT SAMANTHA MILLMAN: Thank you.</p> <p>19 DIEGO VASQUEZ: Next caller, caller 20 Tracy Carpenter, you have been unmuted. Please 21 unmute.</p> <p>22 TRACY CARPENTER: Tracy Carpenter. 23 Studies clearly show the Housing First model has 24 not worked anywhere it's been implemented -- 25 Utah, Seattle, San Fran, Skid Row. With land</p> <p style="text-align: right;">Page 56</p>
<p>1 which is \$750,000 a unit. The developer fee 2 alone is \$1.7 million. That could house so many 3 people. We are in a housing crisis here. We are 4 an incredibly compassionate neighborhood. 5 Everyone I know in Venice wants there to be 6 housing for the people living on our boardwalk 7 and all over this city. We're like Skid Row now.</p> <p>8 We need affordable, immediate housing, 9 not four years from now, not at \$750,000 a unit. 10 Please support us, Planning Department. The city 11 has to listen to us. You've got to come and see 12 what's going on here. Thank you for your time.</p> <p>13 PRESIDENT SAMANTHA MILLMAN: Thank you.</p> <p>14 DIEGO VASQUEZ: Next caller, caller 15 Robin Rudisill, you have been unmuted. Please 16 unmute.</p> <p>17 ROBIN RUDISILL: Hi, Robin Rudisill. 18 When the city council was asked to approve this 19 open space site, I believe they were tricked, and 20 necessary information was purposely withheld. 21 They were erroneously told this was underutilized 22 land, and it was not made clear that this is 23 treasured, extremely valuable, and underutilized 24 land, and it was not made clear that the open 25 space and the dual coastal zone adjacent to this</p> <p style="text-align: right;">Page 55</p>	<p>1 value, \$1 million per unit is a gross misuse of 2 public funds that could be spent more efficiently 3 to help more people. Spending all of the money 4 to help a small percentage of people is not 5 compassion, it is not inclusion. It is 6 corruption.</p> <p>7 Commissioner Helen Leung should recuse 8 herself, and she has well-documented working 9 relationship in Venice Community Housing through 10 her nonprofit, LA-Mas. The project is exempt 11 from environmental review, reduces beach access, 12 has an imposing design, is outrageously 13 expensive, and public data shows VCH's buildings 14 are extremely dangerous. The expected onslaught 15 of emergency vehicles will cause major traffic 16 and parking problems in this area.</p> <p>17 A study shows that Venice has one of 18 the highest rates of subsidized housing in all of 19 LA. Venice has become a containment zone for 20 housing and services, which has only caused the 21 homeless population to go up in our community, 22 while going down in surrounding communities. 23 This policy of containment hasn't worked for Skid 24 Row, and it's not working for Venice. Thank you.</p> <p>25 PRESIDENT SAMANTHA MILLMAN: Thank you.</p> <p style="text-align: right;">Page 57</p>

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<p>1 DIEGO VASQUEZ: Next caller, Vicki  2 Halliday, you have been unmuted. Please unmute.  3 VICKI HALLIDAY: Yes, hi, Vicki  4 Halliday, Venice resident. You have heard many  5 valid reasons this morning why this project is so  6 wrong for Venice. Please have some committee  7 pride in listening to us and deny what is nothing  8 more than a developer's wet dream. Thank you.  9 PRESIDENT SAMANTHA MILLMAN: Thank you.  10 DIEGO VASQUEZ: Next caller, caller  11 Barbara, you have been unmuted. Please unmute.  12 BARBARA: Hi. You're hearing the  13 passion in all our voices because we live here  14 and we've come to the -- I've lived in Venice  15 over most of 30 years. And what we've been  16 fed -- what you've been fed, the drawings that  17 you've been shown today and the information  18 you've been given -- is so misleading and false.  19 I'm going to point out one little, tiny  20 element of this, though it has a huge  21 environmental repercussion. One of the  22 commissioners, Commissioner (indiscernible), you  23 have a beautiful canal behind you in the vision  24 that I'm seeing in the view here. The drawing  25 that they've put up for how they would create the</p> <p style="text-align: right;">Page 58</p>	<p>1 be a huge cost and a huge factor, huge delays,  2 and huge cost overruns.  3 The construction impacts, parking,  4 noise, dust, loss of parking. Are they going to  5 be using the parking lot where the farmers market  6 is for staging and parking? So we're going to  7 lose two parking lots during construction.  8 And the red bridge, they say that it's  9 more for them. There's not going to -- there's  10 not going to be anybody that's going to traverse  11 and go in to walk over that red bridge. So the  12 history of Venice is going to get lost with this  13 project.  14 PRESIDENT SAMANTHA MILLMAN: Thank you.  15 That is your time.  16 DIEGO VASQUEZ: Next caller, caller  17 (indiscernible) Schmidt, you have been unmuted.  18 Please unmute. Mr. Schmidt, you have been  19 unmuted. Please unmute. Mr. Schmidt, you have  20 been unmuted. Please unmute.  21 Moving on, caller Elizabeth Venice, you  22 have been unmuted. Please unmute.  23 ELIZABETH CLAY: Hi there. My name's  24 Elizabeth Clay. I'm a Venice resident. I live  25 in the Silver Triangle, which is right around the</p> <p style="text-align: right;">Page 60</p>
<p>1 canals here on Grand is completely against  2 environmental standards and what is on the rest  3 of the canals, which is, it has to have a natural  4 slope for animals to be able to come in, nest, go  5 out. And it also has to have bushes, to prevent  6 people from falling into the water. They don't  7 show any of it. That's a tiny element of all --  8 PRESIDENT SAMANTHA MILLMAN: Thank you.  9 DIEGO VASQUEZ: Next caller, caller 15  10 -- caller 115, you have been unmuted. You can  11 unmute yourself by pressing star, six. Caller  12 1 --  13 SAUL GOODMAN: Hello? Hello?  14 PRESIDENT SAMANTHA MILLMAN: Yes,  15 hello. Please go ahead.  16 SAUL GOODMAN: Yeah, hi, this is Saul  17 Goodman. The developers conveniently,  18 maliciously put into this document -- I don't  19 have the exact phrasing, but they've injected the  20 language that specifies, even if this project is  21 rejected, any future use would have to be for VCH  22 permanent supportive housing. That has to be  23 removed. That's like, insane.  24 With CEQA, we've got a really high  25 groundwater table here. Dewatering is going to</p> <p style="text-align: right;">Page 59</p>	<p>1 corner. I'm in the residential and commercial  2 design industry, and I'm really not afraid to  3 support good projects. This isn't one of them.  4 This is one of the largest projects I  5 could imagine for this site. It's really a  6 concrete eyesore. It's got no relief to the  7 material on the façade, nor to the masking. For  8 me, it literally looks like the entire site is  9 filled with concrete. It's junior-level  10 architecture, at best.  11 It's not in keeping with the small  12 beachfront community. I'm also aware it doesn't  13 follow high water rise and flood guidelines. As  14 residential builders, we can't ignore water  15 tables, so I'm not sure why this project gets a  16 free pass. Sea level is a mere eight feet below  17 the first floor of this structure.  18 The traffic situation is already  19 abhorrent. And I researched insurance records  20 that describe this to be true, adding to the  21 total (indiscernible) an already terrible  22 situation.  23 Venice is barely surviving the uptick  24 in crime that has sprung up around the last  25 Bridge Housing facility we were told we'd be safe</p> <p style="text-align: right;">Page 61</p>

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<p>1 from --</p> <p>2 PRESIDENT SAMANTHA MILLMAN: Thank you.</p> <p>3 DIEGO VASQUEZ: Next caller is caller</p> <p>4 731. You have been unmuted. Please unmute. You</p> <p>5 can unmute by pressing star, six. Caller 731,</p> <p>6 you have been unmuted.</p> <p>7 JUDY WHITE: Thank you. This is -- my</p> <p>8 name is Judy White, and I live in Marina del Rey,</p> <p>9 and I wanted to speak out in opposition to the</p> <p>10 project.</p> <p>11 I'm opposed to it because the size</p> <p>12 doesn't conform to the neighborhood. It takes</p> <p>13 too long to build, three to four years. It's way</p> <p>14 too expensive, and it removes needed beach</p> <p>15 parking.</p> <p>16 I would propose retaining some beach</p> <p>17 parking close to Pacific Avenue, and then</p> <p>18 installing stationary RVs for homeless people on</p> <p>19 the rest of the property. That could be done</p> <p>20 quickly at far less cost, and it would make a</p> <p>21 positive impact on the lives of the homeless much</p> <p>22 more rapidly, at a much better cost to the</p> <p>23 taxpayer. Thank you.</p> <p>24 PRESIDENT SAMANTHA MILLMAN: Thank you.</p> <p>25 DIEGO VASQUEZ: Next caller, caller</p> <p style="text-align: right;">Page 62</p>	<p>1 one, you have been unmuted. Please unmute</p> <p>2 yourself. Adopter one, you have been unmuted.</p> <p>3 Please unmute.</p> <p>4 Moving on, caller Melissa Diner, you</p> <p>5 have been unmuted. Please unmute.</p> <p>6 MELISSA DINER: Hey, there. Just</p> <p>7 wanted to say that I also am adamantly opposed to</p> <p>8 the cost of this project. We need to be creating</p> <p>9 housing at the lowest cost possible for the most</p> <p>10 amount of people.</p> <p>11 Also, I've been involved locally in the</p> <p>12 neighborhood council for many years, and this is</p> <p>13 the first time I've seen a project where people</p> <p>14 who are typically on opposite sides of everything</p> <p>15 are all united and against this project. I think</p> <p>16 that speaks loud and clear for where the</p> <p>17 community is. It's a rare day when I see that</p> <p>18 happen, and I think that's really important for</p> <p>19 you guys to take into consideration, when</p> <p>20 everyone in the community adamantly speaks out</p> <p>21 against something.</p> <p>22 And we've been over this over and over</p> <p>23 and over again, over a number of years, and that</p> <p>24 seems to be the same consensus. I think that's</p> <p>25 something you guys really need to take seriously.</p> <p style="text-align: right;">Page 64</p>
<p>1 Rachel, you have been unmuted. Please unmute.</p> <p>2 RAQUEL PLASENCIA: My name is Raquel</p> <p>3 Plasencia, and I live a half a block from the</p> <p>4 project for the last 32 years. I live on a walk</p> <p>5 street with other families and at least six young</p> <p>6 children, in a home that is deemed historic, and</p> <p>7 I can't make any changes without any</p> <p>8 restrictions.</p> <p>9 As far as the parking is concerned, the</p> <p>10 plans are to have tandem parking and to use lifts</p> <p>11 to park cars on -- to raise them up to other</p> <p>12 levels. This kind of parking would require</p> <p>13 people to supervise the situation so that adults</p> <p>14 and children would be safe and not get hurt in</p> <p>15 these situations. And of course, that would be</p> <p>16 more money for the attendants and for repairs.</p> <p>17 Also, I wanted to speak about the</p> <p>18 homeless units here at the site that are for the</p> <p>19 severely -- people with mental disorders. Oh,</p> <p>20 shucks, let's see. There should be mental health</p> <p>21 professionals that should provide plans and goals</p> <p>22 as to how (indiscernible) people --</p> <p>23 PRESIDENT SAMANTHA MILLMAN: That's</p> <p>24 your time. Thank you.</p> <p>25 DIEGO VASQUEZ: Next caller, adopter</p> <p style="text-align: right;">Page 63</p>	<p>1 Thank you.</p> <p>2 PRESIDENT SAMANTHA MILLMAN: Thank you.</p> <p>3 DIEGO VASQUEZ: Next caller, Michael</p> <p>4 Jensen, you have been unmuted. Please unmute.</p> <p>5 MICHAEL JENSEN: Hi, can you hear me?</p> <p>6 PRESIDENT SAMANTHA MILLMAN: Loud and</p> <p>7 clear.</p> <p>8 MICHAEL JENSEN: Great. So I just want</p> <p>9 to make three points on this. This project</p> <p>10 upends every local zoning and planning document</p> <p>11 that exists for these parcels. It is the most</p> <p>12 extreme version of spot zoning that you could</p> <p>13 conceive of.</p> <p>14 Second, the local Venice Neighborhood</p> <p>15 Council and Land Use and Planning Committee</p> <p>16 roundly rejected this project numerous times,</p> <p>17 unanimously. And I think to ignore that would be</p> <p>18 just completely irresponsible.</p> <p>19 The last point I want to make is, this</p> <p>20 is just an exemplar of the gross waste of limited</p> <p>21 tax money we have, and it's going to benefit a</p> <p>22 fraction of the homelessness in our city. And I</p> <p>23 think this is not the pathway to solve</p> <p>24 homelessness; it is only the pathway to spend as</p> <p>25 much money as possible in not solving it.</p> <p style="text-align: right;">Page 65</p>

<p>1 So, thank you for -- thank you for my 2 time. 3 PRESIDENT SAMANTHA MILLMAN: Thank you. 4 DIEGO VASQUEZ: Next caller, Gene, you 5 have been unmuted. Please unmute. 6 GENE: Hello. Can you hear me? 7 PRESIDENT SAMANTHA MILLMAN: Loud and 8 clear. Please go ahead. 9 GENE: Yes, thank you. I'm a long-time 10 Venice resident, and from what's going on in 11 Venice right now, it's very clear that the 12 homeless situation is unmanageable. This is only 13 going to add to the unbelievable disaster that 14 bridge housing, the oceanfront walk, and 15 everywhere else in Venice the lack of police has 16 created. 17 I would like to know how on earth 18 anybody is going to guarantee that this isn't 19 going to look exactly like outside of bridge 20 housing within a month or two after it's 21 completed, or our oceanfront walk, not to mention 22 that it's in a flood zone. It's subject to sea- 23 level rise. It's grossly over budget, horrible 24 design, blocks access to the beach, limit's the 25 city's ability to come to the beach and park.</p> <p style="text-align: right;">Page 66</p>	<p>1 ALLAN PARSONS: Hi. My name is Allan 2 Parsons. I'm a Venice homeowner. 3 (indiscernible) and VCH are primary operators of 4 the shelters in Venice. A recent (indiscernible) 5 LAPD calls for service to any properties owned or 6 operated by VCH, (indiscernible) revealed that, 7 between June 2019 and October 2020, the LAPD 8 responded nearly 750 times to Venice addresses 9 housing formerly homeless individuals under the 10 supervision of these operators. VCH specifically 11 accounted for 371 calls to 9-1-1 over a six-month 12 period. One particular project that they 13 operate, 200 Lincoln Boulevard, with just 15 -- 14 I'm sorry -- with just 13 residents, accounted 15 for 130 calls to the LAPD. One hundred and 16 thirty calls to the LAPD for just 13 residents 17 under the supervision of VCH. 18 If VCH is supposed to be providing 19 housing and wraparound services to their 20 (indiscernible), why are we seeing incredibly 21 high call volumes for mental illness? 22 (indiscernible) to these facilities, leaving the 23 security and healthcare professionals onsite. 24 I urge (indiscernible) to deny this 25 project, and I thank you for your time.</p> <p style="text-align: right;">Page 68</p>
<p>1 It's totally politically motivated. 2 It's a giveaway of public land to a nonprofit 3 that has no business anywhere near this type of 4 development. 5 PRESIDENT SAMANTHA MILLMAN: Thank you. 6 DIEGO VASQUEZ: Next caller, caller 7 Lisa Farr Johnstone, you have been unmuted. 8 Please unmute. Lisa, you have been unmuted. 9 Please unmute. 10 LISA FARR JOHNSTONE: Sorry. Hi. I'm 11 an eight-year resident in the Silver Triangle. 12 I'm a big supporter of the project. I'm a big 13 supporter of the CHC. I really admire the work 14 that they're doing in the face of -- 15 PRESIDENT SAMANTHA MILLMAN: I'm so 16 sorry to stop you, but we are currently only 17 hearing -- and I'm going to pause the time -- 18 right now, we're hearing from opponents of the 19 project. I will call for people to testify in 20 support of the project shortly. 21 LISA FARR JOHNSTON: Oh, thank you so 22 much. 23 PRESIDENT SAMANTHA MILLMAN: Thank you. 24 DIEGO VASQUEZ: Next caller, Allan 25 Parsons, you have been unmuted. Please unmute.</p> <p style="text-align: right;">Page 67</p>	<p>1 PRESIDENT SAMANTHA MILLMAN: Thank you. 2 DIEGO VASQUEZ: Next caller, caller 3 Jessica Raines, you have been unmuted. Please 4 unmute. Jessica, you have been unmuted. Please 5 unmute. 6 JESSICA RAINES: It didn't do anything. 7 PRESIDENT SAMANTHA MILLMAN: -- 8 testify? Jessica, you are unmuted. You may 9 begin your comments. 10 JESSICA RAINES: I don't 11 (indiscernible). I didn't do anything. 12 DIEGO VASQUEZ: (indiscernible). 13 Howard, you have been unmuted. Please unmute. 14 HOWARD WEISENFELD: Yes, hi. Can you 15 hear me? 16 PRESIDENT SAMANTHA MILLMAN: Loud and 17 clear. Go ahead. 18 HOWARD WEISENFELD: Great. My name is 19 Howard Weisenfeld. I have been a property owner 20 and resident in the past Venice for 40 years. 21 Commissioners, I wish all of you will really, 22 truly take a look at the realities of what this 23 project will do to the Venice community, the 24 impact it will have. 25 This is aside from the extensive cost</p> <p style="text-align: right;">Page 69</p>

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<p>1 that I'm sure you're all aware that the costs of 2 building and construction has gone up 3 tremendously, even in the last year, and will 4 only get higher. Plus, the project will take 5 longer than even planned. That's just the normal 6 thing whenever you build anything, and as someone 7 who has done so in the past, that's the reality. 8 To have a place that's going to cost 9 \$700,000 per unit, and likely close to \$1 million 10 per studio unit, makes no sense. There is land 11 that the city of Los Angeles that can be used for 12 this project or other projects like this at a 13 much better cost. And if you were building it 14 yourself, I know you wouldn't spend the money 15 needlessly. You would do it properly. Thank 16 you. 17 PRESIDENT SAMANTHA MILLMAN: Thank you. 18 DIEGO VASQUEZ: Next caller, caller 19 Venice resident, you have been unmuted. Please 20 unmute. Venice resident, you have been unmuted. 21 Please unmute. 22 JAKE: Hi, my name is Jake. I'm a 23 Venice resident for over 10 years. I strongly 24 oppose this project. This poses many 25 environmental hazards (indiscernible) now. The</p> <p style="text-align: right;">Page 70</p>	<p>1 to agree with Melissa, who called in a little 2 earlier. Venice usually does not agree on 3 anything. Almost everybody in Venice agrees on 4 this. 5 And I can go through the myriad of very 6 valid reasons why this is not a good project, but 7 I'm going to take it from a different angle. If 8 you sort of took the emotion out of all this, and 9 you got the best city planner, the best 10 supportive development guy, the best 11 humanitarian, you had the best team in the world, 12 you took them through Venice, you showed them 13 2,000 people sleeping on the streets and all that 14 comes with that, and you said, here's \$100 15 million. Can you help us with this? Can you fix 16 this problem? This is not what they would come 17 up with. This is not remotely feasible, and this 18 becomes more and more illogical every single 19 week. Please deny this. 20 PRESIDENT SAMANTHA MILLMAN: Thank you. 21 DIEGO VASQUEZ: Next caller, caller 22 860, you have been unmuted. Please unmute. You 23 can unmute by pressing star, six. Caller 860, 24 you have been unmuted. You can unmute by 25 pressing star, six.</p> <p style="text-align: right;">Page 72</p>
<p>1 other bridge housing project in Venice is a 2 failure and has led to increased crime and 3 murder. This area is becoming unsafe to the 4 public, let alone children and seniors. 5 The proposed site is a major beach, and 6 that nice parking lot is heavily used and often 7 full. Public parking is already extremely 8 limited, and the new parking lot is not 9 appealing, given the crime history at bridge 10 housing locations. 11 There are a number of transients living 12 at the proposed site, and I am aware that they 13 have rejected housing offers on multiple 14 occasions. This is the preferred lifestyle for 15 many of the transients in the area. I believe we 16 should follow Austin, Texas, and put a ban on 17 public camping, instead of spending billions of 18 tax dollars each year on the issue. Thank you. 19 PRESIDENT SAMANTHA MILLMAN: Thank you. 20 DIEGO VASQUEZ: Next caller, caller 21 Brian Averill, you have been unmuted. Please 22 unmute. 23 BRIAN AVERILL: Hello, everyone. My 24 name is Brian Averill. I am also a board member 25 on the Venice Neighborhood Council, and I'd like</p> <p style="text-align: right;">Page 71</p>	<p>1 Moving on, caller Marilyn Fox, you have 2 been unmuted. Please unmute. Marilyn Fox, you 3 have been unmuted. Please unmute. 4 MARILYN FOX: Yes, hello. Hello, my 5 name is Marilyn Fox. I'm the artistic director 6 of Pacific Resident Theater in Venice. I'm 7 speaking to you from my heart. 8 I've been working in Venice for 35 9 years. I care deeply about anybody who is 10 homeless. My sister has been homeless. I want 11 very badly for people to be housed, but this is 12 not the way. This does not help. 13 My sister was on one of those lists for 14 five years. It doesn't help. Very few people 15 get help, and we need much more immediate help. 16 And we need to look into our hearts and know that 17 this is not -- we all want what's good, but this 18 is not the way. This is not the way to build 19 this. This is too expensive, and it will not 20 take people off the streets soon enough. 21 There is a desperate need, a desperate 22 need in Venice to rehouse people and to help them 23 in a much faster way. And I just heard Andy -- 24 Andrew Bales speak, and I know he was speaking 25 from his heart. He lost both his legs at the</p> <p style="text-align: right;">Page 73</p>

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<p>1 Union Mission helping people.</p> <p>2       PRESIDENT SAMANTHA MILLMAN: Time.</p> <p>3 Thank you.</p> <p>4       DIEGO VASQUEZ: Next caller, caller</p> <p>5 Christopher Wu, you have been unmuted. Please</p> <p>6 unmute. He has left.</p> <p>7       Next caller, Erica Moore, you have been</p> <p>8 unmuted. Please unmute. Erica Moore, you have</p> <p>9 been unmuted. Please unmute.</p> <p>10       ERICA MOORE: Hi, this is Erica, and I</p> <p>11 want to Echo what Brian Averill said. This</p> <p>12 has -- absolutely does not make sense. It is</p> <p>13 nonsensical to spend that amount of money in this</p> <p>14 way, and experts would not do that.</p> <p>15       I lived in the Venice canals for years.</p> <p>16 I'm a 37-year business owner in Venice, and I'm</p> <p>17 also a renting resident in Venice for over 40</p> <p>18 years. Please deny this project. Thank you.</p> <p>19       PRESIDENT SAMANTHA MILLMAN: Thank you.</p> <p>20       DIEGO VASQUEZ: Next caller,</p> <p>21 (indiscernible), you have been unmuted. Please</p> <p>22 unmute.</p> <p>23       MAN 2: Yes, I'm a resident here in</p> <p>24 Venice, and the question is, does this project</p> <p>25 improve Venice itself? Does it evolve Venice</p> <p style="text-align: right;">Page 74</p>	<p>1 parking lot from my kitchen window.</p> <p>2       This project does not make sense at</p> <p>3 all. The amount of money that it's going to cost</p> <p>4 could house so many more people. And they need</p> <p>5 mental health and drug addiction recovery, which</p> <p>6 the people who will be living in that facility</p> <p>7 will not be required to get.</p> <p>8       Sorry, I'm a little emotional about it.</p> <p>9 And I encourage all of you, especially you on the</p> <p>10 board, to try to find the recording of Reverend</p> <p>11 Andy Bales's comments from the other day. What</p> <p>12 he says is frightening, and if the corruption is</p> <p>13 true behind this project, it's got to be stopped.</p> <p>14 Thank you.</p> <p>15       PRESIDENT SAMANTHA MILLMAN: Thank you.</p> <p>16       DIEGO VASQUEZ: Next caller, caller</p> <p>17 Paula, you have been unmuted. Please unmute.</p> <p>18       PAULA: Yes, hi, good afternoon,</p> <p>19 Commission. My name is Paula (indiscernible).</p> <p>20 I'm urging you to oppose this project, for the</p> <p>21 many reasons that everybody listed. It's not</p> <p>22 conducive for the neighborhood, the scale, the</p> <p>23 architecture. It's going to help too few people.</p> <p>24 The price tag -- no developer would come in with</p> <p>25 such a price tag. You on the board are</p> <p style="text-align: right;">Page 76</p>
<p>1 into a better situation?</p> <p>2       Under the circumstances, considering</p> <p>3 the expense and price-to-value, so to speak, it</p> <p>4 certainly doesn't. And I'm asking the</p> <p>5 commissioners, from a common-sense standpoint,</p> <p>6 does this make sense, considering what we're</p> <p>7 hearing?</p> <p>8       PRESIDENT SAMANTHA MILLMAN: Thank you.</p> <p>9       DIEGO VASQUEZ: Next caller, caller</p> <p>10 Richard Rothstein, you have been unmuted. Please</p> <p>11 unmute. Richard, you have been unmuted. Please</p> <p>12 unmute.</p> <p>13       RICHARD ROTHSTEIN: Yes, Richard</p> <p>14 Rothstein. I'm a property owner, a multi-</p> <p>15 property owner in Venice for the last 30 years.</p> <p>16       I have to install cameras at my place</p> <p>17 because I keep having intrusions, thievery. I</p> <p>18 highly disagree with this project. Please vote</p> <p>19 this down. That's it.</p> <p>20       PRESIDENT SAMANTHA MILLMAN: Thank you.</p> <p>21       DIEGO VASQUEZ: Next caller, Julie</p> <p>22 Bean, you have been unmuted. Please unmute.</p> <p>23       JULIE BEAN: Hi. Thank you. My name</p> <p>24 is Julie Bean, and I've been a resident for 19</p> <p>25 years in Venice, and I live -- I can see the</p> <p style="text-align: right;">Page 75</p>	<p>1 architect, developer, real estate investor. You</p> <p>2 will not approve that in your back yard, or you</p> <p>3 would stamp off to give this kind of money.</p> <p>4       I am pro housing, pro housing for</p> <p>5 homelessness, and I think this one is just not</p> <p>6 the right solution. It's not the answer to the</p> <p>7 crisis, and it's not going to improve our</p> <p>8 neighborhood, and it would be detrimental for a</p> <p>9 very long term.</p> <p>10       So I ask you to preserve the coast and</p> <p>11 not put homelessness housing into a flooding</p> <p>12 zone. Thank you so much.</p> <p>13       PRESIDENT SAMANTHA MILLMAN: Thank you.</p> <p>14       DIEGO VASQUEZ: Next caller, caller</p> <p>15 Christopher Wu, you have been unmuted. Please</p> <p>16 unmute.</p> <p>17       CHRISTOPHER: Hi, can you hear me? All</p> <p>18 right, thanks. I'm Chris (indiscernible), a</p> <p>19 Venice resident. I'm just asking the City</p> <p>20 Planning Commission to please just, you know, be</p> <p>21 -- use reason. I mean, you guys are the city --</p> <p>22 our city planners. Let's take the politics out</p> <p>23 of it.</p> <p>24       This is just not a good use of the</p> <p>25 land. I mean, the fact that you're trying to</p> <p style="text-align: right;">Page 77</p>

20 (Pages 74 - 77)

<p>1 skirt environmental study is crazy. We're right 2 by the beach. I'm further away from the beach 3 (indiscernible) zone, and I need to pay for flood 4 insurance.</p> <p>5 The parking is tandem parking, 6 mechanical lift parking. I mean, if you guys 7 have actually lived and seen this, it's just 8 crazy to think. It's already crowded, and it's 9 different for people get out of -- you know, get 10 out of their cars, and with all that -- with all 11 the stuff that they have. And to try to put 12 tandem parking in here, mechanical lift parking, 13 is just crazy.</p> <p>14 I'm just asking for reason. You guys 15 are city planners. Please, just take an 16 objective view of this project. It just does not 17 make sense at all. Thank you.</p> <p>18 PRESIDENT SAMANTHA MILLMAN: Thank you.</p> <p>19 DIEGO VASQUEZ: Next caller, caller 20 Marie Hamed, you have been unmuted. Please 21 unmute.</p> <p>22 MARIE HAMED: Yes, I grew up in Culver 23 City. I live in Venice now, and it was my 24 playground. And I could drive, I could park, I 25 could get here. Venice was built after the</p> <p style="text-align: right;">Page 78</p>	<p>1 pause the clock, and I'm going to pause the timer 2 so I can explain this. It's actually a very good 3 question.</p> <p>4 So we are using Zoom Webinar. So, on 5 the viewer end, so anyone who is a member of the 6 public who is viewing, when someone turns their 7 camera off to, say, eat lunch so the public 8 doesn't have to watch them chew their food, 9 instead of you seeing their name in their black 10 box, which is typically what you would see if you 11 were in a normal Zoom meeting, the picture goes 12 away completely.</p> <p>13 So what I'm looking at in my screen, 14 for example, is I see Commissioner Mack is here. 15 Her camera is off. I presume that she is eating 16 lunch, as is Commissioner Perlman, as is 17 Commissioner Hornstock. She's waving. See, 18 she's eating lunch. But when she turns her 19 camera off, she goes away, and you don't see a 20 box with her name in it. Commissioner Perlman is 21 waving, et cetera.</p> <p>22 So it's not that we are leaving. We 23 are listening to the audio and we are here. But 24 if we turn our camera off to, let's say, take our 25 competitor with us to use the facilities or eat</p> <p style="text-align: right;">Page 80</p>
<p>1 canals. It was named after the canals, the 2 Venice canals. I can't believe you're not 3 putting an -- doing an EIR report. I cannot 4 believe. It's history. It's Venice, the canals, 5 and you're putting this monstrosity right next to 6 it, and I just see a disaster happening. I see 7 the canals disappearing.</p> <p>8 I mean, I cannot -- I cannot fathom why 9 you are not researching this more, to see what 10 kind of an impact this huge monstrosity is. 11 Thank you.</p> <p>12 PRESIDENT SAMANTHA MILLMAN: Thank you.</p> <p>13 DIEGO VASQUEZ: Next caller, caller 14 adopter one, you have been unmuted. Please 15 unmute. Adopter one, you have been unmuted. 16 Please unmute.</p> <p>17 MARK GALANTY: Hello, this is Mark 18 Galanty. I'm president of Venice Canals. I have 19 a question for President Mellman, just a point of 20 order. I don't see quorum. Is there a required 21 quorum at this meeting? I've seen commissioners 22 leave and come, and I just -- before I speak, I 23 was hoping I could get that addressed for a 24 second.</p> <p>25 PRESIDENT SAMANTHA MILLMAN: Let's</p> <p style="text-align: right;">Page 79</p>	<p>1 our lunch, it appears to the public that we are 2 not here. I am closely monitoring quorum, and I 3 can see that all commissioners are here. And you 4 will often hear me announce for the record when a 5 commissioner has actually left the meeting.</p> <p>6 So that is a long way of saying, yes, 7 we have quorum, and yes, everyone is here.</p> <p>8 MARK GALANTY: Thank you for clarifying 9 that. I appreciate it.</p> <p>10 PRESIDENT SAMANTHA MILLMAN: Of course.</p> <p>11 MARK GALANTY: So my name is Mark 12 Galanty. I'm the president of the Venice Canals 13 Association. We're a nonprofit that was 14 established in 1978 to improve and protect the 15 Venice Canals and its environment, and led the 16 effort to restore them, and we're against this 17 project, as well as our members.</p> <p>18 And what I wanted to just -- you know, 19 commissioners, I appreciate your time and 20 everyone spending time here. And you've been 21 given an important job, which is to make a 22 recommendation on this project. I hope you'll at 23 least recognize that, you know, this is a 24 historic district, as people have said, built in 25 1906. This section was reestablished as a</p> <p style="text-align: right;">Page 81</p>

21 (Pages 78 - 81)



<p>1 historic section with the banks, back to what  2 Abbot Kinney did. He built these originally.  3 And it's an environmental issue and --  4 PRESIDENT SAMANTHA MILLMAN: Time.  5 MARK GALANTY: If I could get just 15  6 seconds more, I hope you'll recognize --  7 PRESIDENT SAMANTHA MILLMAN: I have to  8 give everyone equal time, but we will give 10  9 more seconds, because I believe that you asked a  10 point of order before. So 15 -- or 10 seconds.  11 DIEGO VASQUEZ: Commissioner Mellman, I  12 have lost completely of the speaker.  13 PRESIDENT SAMANTHA MILLMAN: Oh, okay,  14 then let's go to our final speaker.  15 DIEGO VASQUEZ: Pam (indiscernible),  16 you have been unmuted. Please unmute.  17 PAM: Can you hear me?  18 PRESIDENT SAMANTHA MILLMAN: Loud and  19 clear. Please go ahead.  20 PAM: Okay. Please deny this project  21 for the various reasons brought to your  22 attention. I live directly across the street  23 from the proposed project for six years. Bridge  24 housing has brought an increased amount of crime  25 into the Venice community. This project will</p> <p style="text-align: right;">Page 82</p>	<p>1 Venice Neighborhood Council that already spoke,  2 and I would just like to speak from the heart as  3 well.  4 As a parent, as a renter, as somebody  5 who looks at herself and the way that I raise my  6 family as stewards of the beach, I really urge  7 the planning committee to come down to Venice.  8 Please see what's happening on our streets. It  9 is impossible to see what this project will do to  10 our community just from the renderings,  11 especially given the conflicts that we, as  12 stakeholders in Venice, have experienced with  13 this developer. It is irresponsible of the  14 planning commission to ignore the myriad of  15 complaints that we have had against the CHC.  16 They're a bad partner, and they're a bad  17 neighbor.  18 Come to Venice. See what's going on.  19 The parking that they're proposing alone is a  20 disaster. Please, hear us. We have nowhere else  21 to go. Thank you.  22 PRESIDENT SAMANTHA MILLMAN: Okay.  23 That was exactly an hour, and we were able to  24 hear everyone who had their hand raised. We do  25 have -- as hands are going up, although I believe</p> <p style="text-align: right;">Page 84</p>
<p>1 have the same result.  2 It is dubious and dangerous that this  3 project is trying to be exempt from the  4 environmental impact requirements and the various  5 other requirements. This project does not  6 represent the best interests of the existing  7 residents of Venice, like myself, and the  8 immediate surrounding neighbors.  9 Please keep our open spaces, parks, and  10 parking. The five people that live on the  11 Pacific between South and North Venice have  12 refused housing on multiple occasions. The  13 majority of them are not from LA and prefer their  14 freedom living on the streets, because they can  15 do whatever they want.  16 Please deny this project. Thank you.  17 PRESIDENT SAMANTHA MILLMAN: Thank you.  18 And then, this next speaker is going to be our  19 last speaker on this item, as we have one minute  20 remaining.  21 DIEGO VASQUEZ: (indiscernible), you  22 have been unmuted. Please unmute.  23 WOMAN 3: Hi. Good afternoon. Thank  24 you, commissioners. Thank you for hearing us. I  25 just want to agree with my colleagues for the</p> <p style="text-align: right;">Page 83</p>	<p>1 we heard from several of those people  2 So, now we are going -- I'm going to go  3 ahead and raise hands, so everyone hold on for a  4 second. I'm lowering all the hands. I am  5 lowering all the hands. Thank you. So, now we  6 are going to hear from people who are in support  7 of the project. If you are here to support the  8 project, please either spend -- press star, nine,  9 or the raise-hand button, and you will have one  10 minute to speak. I've already given the  11 instructions for how to participate.  12 Again, if you're dialing in by phone,  13 please, once you hear you are unmuted, press  14 star, six to unmute yourself. I'm going to put  15 an hour on the clock. I will start it when the  16 first speaker begins, and let's go ahead and call  17 our speakers.  18 DIEGO VASQUEZ: Caller Gregory Cruz,  19 you have been unmuted. Please unmute.  20 GREGORY CRUZ: I am Gregory Cruz.  21 Hello. I arrived in Venice in 1989 as a disabled  22 veteran. I was benefitted by low-income  23 programs. The Reese Davidson project would offer  24 much needed quality of life to those who could  25 not possibly afford the healing (indiscernible)</p> <p style="text-align: right;">Page 85</p>



<p>1 of the area.</p> <p>2 Let's not let it be captured by</p> <p>3 affluent only. Aging boomers, struggling</p> <p>4 artisans, disabled veterans would benefit from</p> <p>5 this. So I implore people to look into your</p> <p>6 hearts and souls and your conscience, and realize</p> <p>7 that some people deserve this area. It's a high</p> <p>8 quality of life area, as I said, that could not</p> <p>9 be afforded by the people I have mentioned</p> <p>10 before, me being one of them. So keep in your</p> <p>11 mind the openness of the possibilities of that</p> <p>12 area.</p> <p>13 I thank you.</p> <p>14 PRESIDENT SAMANTHA MILLMAN: Thank you.</p> <p>15 DIEGO VASQUEZ: Next caller, caller</p> <p>16 Patricia Greenfield, you have been unmuted.</p> <p>17 Please unmute. Patricia, you have been unmuted.</p> <p>18 Please unmute.</p> <p>19 PATRICIA GREENFIELD: Okay, can you</p> <p>20 hear me?</p> <p>21 PRESIDENT SAMANTHA MILLMAN: Yes.</p> <p>22 PATRICIA GREENFIELD: My name is Dr. --</p> <p>23 my name is Dr. Patricia Greenfield. I've lived</p> <p>24 in the Venice Canals and beach area for 47 years.</p> <p>25 I want to express strong support for Reese</p> <p style="text-align: right;">Page 86</p>	<p>1 you hear me?</p> <p>2 PRESIDENT SAMANTHA MILLMAN: Please go</p> <p>3 ahead.</p> <p>4 LYDIA BONSAI: Thank you. Lydia</p> <p>5 Bonsay. This is indigenous soil and unseeded</p> <p>6 land. Anyone saying otherwise is a white</p> <p>7 supremacist colonizer. Colonizers who have</p> <p>8 benefited from the mellow denied and the RSO</p> <p>9 erased of affordable housing in Venice as the</p> <p>10 replacement homes as promised by ruthless</p> <p>11 developers never were built. Specifically, these</p> <p>12 opponents for this project are responsible for</p> <p>13 the ethnic cleanse that occurred in the last 30</p> <p>14 years. And I'm not impressed with white</p> <p>15 supremacy unity.</p> <p>16 The opponents were proponents of much</p> <p>17 of the develop that caused for segregation in</p> <p>18 Venice and division. VNC is advisory, and most</p> <p>19 of the people sitting there, minus four, come out</p> <p>20 by Venice. The Reese Davidson project is a good</p> <p>21 start to house people at very low, low, and</p> <p>22 moderate incomes. Much is owed to the Venice</p> <p>23 community for Bipoch families that were</p> <p>24 displaced.</p> <p>25 This argument against it is convenient</p> <p style="text-align: right;">Page 88</p>
<p>1 Davidson.</p> <p>2 We need to provide housing for people</p> <p>3 who serve our community, that have to travel long</p> <p>4 distances to get here. Reese Davidson has 34</p> <p>5 units for low-wage earners. We have an important</p> <p>6 need to keep artists in Venice. Reese Davidson</p> <p>7 has another 34 units for artists. Venice has an</p> <p>8 overwhelming number of unhoused people. Reese</p> <p>9 Davidson has 68 units for people experiencing</p> <p>10 homelessness and provides onsite social services.</p> <p>11 It's also an imaginative mixed-use</p> <p>12 project that will include shops, restaurants with</p> <p>13 outdoor seating, community arts center named</p> <p>14 after Gregory Hines. As someone who worked with</p> <p>15 Reese Davidson in his 70s and also knew Greg</p> <p>16 Hines, I'm particularly happy that both of these</p> <p>17 important --</p> <p>18 PRESIDENT SAMANTHA MILLMAN: Time.</p> <p>19 PATRICIA GREENFIELD: -- be remembered</p> <p>20 in this way.</p> <p>21 PRESIDENT SAMANTHA MILLMAN: Thank you.</p> <p>22 DIEGO VASQUEZ: Next caller. Caller</p> <p>23 850, you have been unmuted. You can unmute by</p> <p>24 pressing star 6.</p> <p>25 LYDIA BONSAI: Can you hear me? Can</p> <p style="text-align: right;">Page 87</p>	<p>1 racist economic amnesia. Please approve this</p> <p>2 monumental healing project for the people who</p> <p>3 were gentrified out, the essential people who</p> <p>4 make Venice who she is for everyone.</p> <p>5 PRESIDENT SAMANTHA MILLMAN: Time.</p> <p>6 LYDIA BONSAI: Please -- thank you.</p> <p>7 PRESIDENT SAMANTHA MILLMAN: Thank you.</p> <p>8 DIEGO VASQUEZ: Next caller. Caller</p> <p>9 396, you have been unmuted. Please unmute. You</p> <p>10 can unmute by pressing star 6.</p> <p>11 CLARK BROWN: I'm Clark Brown. I</p> <p>12 support the project for the reasons set forth in</p> <p>13 the recommendation report of the Commission</p> <p>14 staff. I have lived in Venice since 1969 within</p> <p>15 a mile of the project. Venice needs housing for</p> <p>16 its exploding homeless population, which is not</p> <p>17 going away.</p> <p>18 It also needs home -- housing for low-</p> <p>19 income people who work here. They are vital to</p> <p>20 our tourist economy and cannot afford Venice</p> <p>21 market rate housing. Venice needs housing for</p> <p>22 these populations to be the socially,</p> <p>23 economically, and racially equitable community</p> <p>24 Venice says it wants to be.</p> <p>25 Also, Venice needs to build low-income</p> <p style="text-align: right;">Page 89</p>

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<p>1 housing to meet its fair share of the 10,000</p> <p>2 units of low-income housing the City plans to</p> <p>3 build within the next three years. Here, the</p> <p>4 City has the land and the money to provide this</p> <p>5 housing, and it should do so. The Venice</p> <p>6 Neighbor Council's objections to the project are</p> <p>7 without merit for the reasons I stated in the</p> <p>8 written comments I filed with the Commission on</p> <p>9 Monday. Thank you very much.</p> <p>10 PRESIDENT SAMANTHA MILLMAN: Thank you.</p> <p>11 DIEGO VASQUEZ: Next caller. Chris</p> <p>12 Tilly, you have been unmuted. Please unmute.</p> <p>13 CHRIS TILLY: Hi. Okay. Can you hear</p> <p>14 me?</p> <p>15 DIEGO VASQUEZ: Now we --</p> <p>16 PRESIDENT SAMANTHA MILLMAN: Now we can</p> <p>17 hear. Please go ahead.</p> <p>18 CHRIS TILLY: I'm Chris Tilly. I've</p> <p>19 been a Venice homeowner for 12 years, and I live</p> <p>20 a six-minute walk from the Reese Davidson site.</p> <p>21 I'm a strong supporter of Reese Davidson. I am</p> <p>22 professor and chair of the Urban Planning</p> <p>23 Department at UCLA, and I teach my students about</p> <p>24 the dangers of economic and racial segregation.</p> <p>25 But I've been experiencing that growing</p> <p style="text-align: right;">Page 90</p>	<p>1 low-income artists, which everyone believes we</p> <p>2 must return to Venice, and unhoused people.</p> <p>3 It's just a win-win, and it's going to</p> <p>4 be a joy to sit -- to actually see it and</p> <p>5 experience the open space rather than a dead</p> <p>6 parking lot. Thank you so much.</p> <p>7 PRESIDENT SAMANTHA MILLMAN: Thank you.</p> <p>8 DIEGO VASQUEZ: Next caller. Caller</p> <p>9 CEK, you have been unmuted. Please unmute.</p> <p>10 CARLY KERCHIN: Hi there. My name is</p> <p>11 Carly Kerchin and I'm speaking on behalf of Unite</p> <p>12 Here Local 11. We're pleased to support the</p> <p>13 Reese Davidson Community project. Ninety percent</p> <p>14 of our members were laid off at the beginning of</p> <p>15 the pandemic. Already, many of them low-wage</p> <p>16 workers who have now been thrown into housing</p> <p>17 insecurity, and in some cases homelessness, we</p> <p>18 are proud to support a project dealing with the</p> <p>19 pressing housing issues in our community. Thank</p> <p>20 you very much.</p> <p>21 PRESIDENT SAMANTHA MILLMAN: Thank you.</p> <p>22 DIEGO VASQUEZ: Next caller. Emerson,</p> <p>23 you have been unmuted. Please unmute. Emerson,</p> <p>24 you have been unmuted. Please unmute.</p> <p>25 EMERSON DAMRIN: Hi there. My name's</p> <p style="text-align: right;">Page 92</p>
<p>1 segregation here in Venice. Building this</p> <p>2 project will help restore some of the diversity</p> <p>3 that Venice has lost. That will help create</p> <p>4 economic opportunities for low-income folks, and</p> <p>5 will help to reduce the economic, social, and</p> <p>6 political division and polarization that have</p> <p>7 been so destructive in our city and in our</p> <p>8 country. Thank you.</p> <p>9 PRESIDENT SAMANTHA MILLMAN: Thank you.</p> <p>10 DIEGO VASQUEZ: Next caller. Caller</p> <p>11 LuksVPHCorp.org, you have been unmuted. Please</p> <p>12 unmute.</p> <p>13 LINDA LUKS: Hello. My name is Linda</p> <p>14 Luks, and I have been a residence of the Venice</p> <p>15 area since 1970. I also served as president of</p> <p>16 the Venice Neighborhood Council for two terms,</p> <p>17 and I was on the City Board of Neighborhood</p> <p>18 Commissioners for seven years serving also as</p> <p>19 president.</p> <p>20 I worked part-time for VCH for nine</p> <p>21 years, and it's a joy to be able to look forward</p> <p>22 to sitting there and waiting for a performance at</p> <p>23 the Gregory Hines art studio having a coffee.</p> <p>24 And it will back 140 new permanent homes to</p> <p>25 Venice from people who are low-wage earnings,</p> <p style="text-align: right;">Page 91</p>	<p>1 Emerson Damrin. I live in Venice about a block</p> <p>2 from Ocean Front Walk. We got issues in Venice</p> <p>3 primarily around housing, which is why I support</p> <p>4 the Reese Davidson project. Housing is a human</p> <p>5 right, and right now it's a crisis in L.A., and</p> <p>6 especially in Venice.</p> <p>7 And we're living in a time of</p> <p>8 discontinuity and radical change. And we -- the</p> <p>9 solutions to our problems are going to be</p> <p>10 courageous and ostentatious and disruptive, but I</p> <p>11 think the perfect is the enemy of the great. And</p> <p>12 I think 140 units of supportive and affordable</p> <p>13 housing is a huge win by any metric. I also love</p> <p>14 the emphasis on the arts and entrepreneurship</p> <p>15 because that's totally in harmony with the Venice</p> <p>16 spirit that I live in and love. We need</p> <p>17 creativity and courage and collaboration, and</p> <p>18 that's why I ask you to support Reese Davidson.</p> <p>19 Thank you.</p> <p>20 PRESIDENT SAMANTHA MILLMAN: Thank you.</p> <p>21 DIEGO VASQUEZ: Next caller. Peter,</p> <p>22 you have been unmuted. Please unmute.</p> <p>23 PETE ARBOGAST: Good afternoon. Pete</p> <p>24 Arbogast. Along with being a Hall of Fame play-</p> <p>25 by-play radio announcer for USC, I'm a long-time</p> <p style="text-align: right;">Page 93</p>

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<p>1 resident of Venice. We raised our kids safely in 2 this diverse area working to make it a most 3 interesting place. The kids now live in their 4 own places here in Venice, and we remain directly 5 across the street from the proposed wonderful 6 project to help our homeless friends and 7 neighbors.</p> <p>8 We've seen the plans for Reese Davidson 9 and give our wholehearted endorsement of this 10 beautiful, planned community, which will be a 11 great step forward in our continuing efforts to 12 house and help these homeless. Many need 13 services other than homeless -- homes, and 14 workers will be present at the project at all 15 times to assist in that.</p> <p>16 We have some neighbors who would do 17 anything they can to remove these fellow human 18 beings from their sight. The question always 19 becomes then, where do they go? Where would you 20 have them go? They're already here giving us in 21 Venice the chance to be among the real heroes in 22 this saga.</p> <p>23 We are on the front lines of a battle, 24 and we can make a difference. Emergency times 25 call for emergency measures by brave people and</p> <p style="text-align: right;">Page 94</p>	<p>1 housing crisis. And quite simply, the only way 2 to solve the housing crisis is to build more 3 housing.</p> <p>4 Venice likes to think of itself as 5 politically progressive, and I hope we can put 6 our money where our mouth is. And instead of not 7 just being like formatively progressive with our 8 BLM signs, but actually substantially progressive 9 and approve this community. Thank you.</p> <p>10 PRESIDENT SAMANTHA MILLMAN: Thank you.</p> <p>11 DIEGO VASQUEZ: Next caller. Caller 12 Annie Zimmerman, you have been unmuted. Please 13 unmute.</p> <p>14 ANNE ZIMMERMAN: Anne Zimmerman, I'm a 15 36-year Venice resident, architect, urban 16 designer, and a Venice home and business owner. 17 I've also been on the Venice Community Housing 18 Board for 20 years as a volunteer.</p> <p>19 I enthusiastically support the Reese 20 Davidson Community as an exciting and needed 21 addition to Venice for all the reasons already 22 stated. But I also lived six and a half years 23 right next to the parking lot, so I know how 24 great a solution this project is. Just so many 25 things and issues in Venice.</p> <p style="text-align: right;">Page 96</p>
<p>1 nimbyism must be overwritten. We fully support 2 this project and are excited to see it built as 3 expected over the next few years. Thank you.</p> <p>4 PRESIDENT SAMANTHA MILLMAN: Thank you.</p> <p>5 DIEGO VASQUEZ: Next caller. Marie 6 Kennedy, you have been unmuted. Please unmute.</p> <p>7 MARIE KENNEDY: I'm Marie Kennedy. I'm 8 on the Board of Venice Community Housing, a 9 professor emerita of community planning, and a 10 Venice homeowner living close to the proposed 11 Reese Davidson Community.</p> <p>12 Both personally and professionally, I 13 fully support this well-designed community which 14 will replace an unsightly lot of broken asphalt 15 with housing and services for currently homeless 16 and affordable housing for low-income families 17 and artists who are at risk of becoming homeless. 18 Thank you.</p> <p>19 PRESIDENT SAMANTHA MILLMAN: Thank you.</p> <p>20 DIEGO VASQUEZ: Next caller. Nick 21 Judy, you have been unmuted. Please unmute.</p> <p>22 NICK ISHAN: Hi. My name is Nick Ishan 23 and I live in Venice. I just want to express my 24 support for the Reese Davidson Community. In the 25 States, in California in particular, we have a</p> <p style="text-align: right;">Page 95</p>	<p>1 There is also many things I love about 2 the project. I'm going to just highlight a few. 3 I love how this design provides eyes on the 4 street and homes for people to live in where now 5 there is only a parking lot on asphalt. And I 6 love how the homes hide the parking that's still 7 there for everyone. Thank you.</p> <p>8 PRESIDENT SAMANTHA MILLMAN: Thank you.</p> <p>9 DIEGO VASQUEZ: Caller Ronald Duralt 10 Routa, you have been unmuted. Please unmute.</p> <p>11 RONALD ROUTA: Hello. My name is 12 Ronald Routa. I am a long-time senior occupant 13 of Venice. I've been here since really 1970 and 14 own a home since 1976. A few comments.</p> <p>15 I don't see any calls for use of the 16 property for safe parking, tiny housing, or city- 17 owned campers during the appeal process for this 18 by any of the opponents. Most of Venice is a 19 flood and tsunami zone. So unless the whole 20 community is protected with threat of sea level 21 rise, etc., the flooding items are disingenuous 22 by the opponents.</p> <p>23 The housing element of the state of 24 California requires local communities to provide 25 economic segments for all members of the</p> <p style="text-align: right;">Page 97</p>

<p>1 community. This project has a variety of housing 2 options for low- and moderate-income people, not 3 just rich and not just the homeless. Open space 4 is not an ugly parking lot. So I hope that you 5 approve this project. I'm glad that we have -- 6 finally have -- will have canal boat access, 7 something that was raised by me at one of the 8 meetings.</p> <p>9 PRESIDENT SAMANTHA MILLMAN: Time.</p> <p>10 RONALD ROUTA: Thank you.</p> <p>11 PRESIDENT SAMANTHA MILLMAN: Thank you.</p> <p>12 DIEGO VASQUEZ: Next caller, Bill.</p> <p>13 Bill Przylucki, you have been unmuted. Please 14 unmute.</p> <p>15 BILL PRZYLUCKI: Hello. My name is 16 Bill Przylucki. I am the executive director of 17 People Organized for Westside Renewal. We 18 strongly support the Reese Davidson Community 19 development proposal and urge the Commission to 20 approve it. Our organization has been working to 21 preserve and create affordable housing in Venice 22 and in the Westside since 1999.</p> <p>23 I started my career as an organizer in 24 Venice in 2007 knocking on doors in low-income 25 community -- in the low-income housing</p> <p style="text-align: right;">Page 98</p>	<p>1 made-up stuff. It's just (indiscernible) not a 2 question.</p> <p>3 Venice is known for making homes for 4 those that may not be able to find homes in other 5 places. We have to spend money on buildings to 6 give the homeless and artists a fresh start. VCH 7 has done a tremendous amount of work to get to 8 this point with such an inspiring plan and 9 building.</p> <p>10 I've worked at a shelter. By living at 11 a place like the Reese Davidson project, people 12 will be able to rebuild the confidence to get 13 their life together. I would be so proud to live 14 by this building and its mission. Thank goodness 15 someone has taken this initiative. Thank you.</p> <p>16 PRESIDENT SAMANTHA MILLMAN: Thank you.</p> <p>17 DIEGO VASQUEZ: Next caller. Caller 18 187, you have been unmuted. Please unmute. You 19 can unmute by pressing star 6.</p> <p>20 Caller 187, you have been unmuted. You 21 have been unmuted.</p> <p>22 LOURDES LAVIATON: Okay. Hi. My name 23 is Lourdes Laviaton. I'm a Venice native and a 24 community organizer in Venice. I strongly 25 support Reese Davidson Community. Housing is a</p> <p style="text-align: right;">Page 100</p>
<p>1 developments in Venice. A lot of the doors that 2 I knocked on when I started are gone now. This 3 community is suffering from a severe loss of 4 affordable housing that has changed what this 5 community is about.</p> <p>6 This development moves us back in the 7 right direction. This is the type of development 8 we need. The accusation by opponents of these -- 9 this being a project of "greedy developers" is 10 ludicrous. I have spent my career battling 11 greedy development. This moves us in the right 12 direction by recommodifying land, committing it 13 to low-income people, and returning the land to 14 the Venice community, the folks who built this 15 community. Please approve this project. Thank 16 you.</p> <p>17 PRESIDENT SAMANTHA MILLMAN: Thank you.</p> <p>18 DIEGO VASQUEZ: Next caller. Caller 19 860, you have been unmuted. Please unmute. You 20 can unmute by pressing star 6.</p> <p>21 AMY GOLDSTEIN: Hi. My name is Amy 22 Goldstein and I live on the canals a half a block 23 from the project, and the first thing I want to 24 say is I listened to all the people against it, 25 and they were so bitter, and so dark, and full of</p> <p style="text-align: right;">Page 99</p>	<p>1 human right, and everyone has the right to a safe 2 place to live. The city and the Venice community 3 continue to see a growing housing and 4 homelessness crisis, which won't be solved unless 5 we create new housing options like this in every 6 neighborhood, including Venice.</p> <p>7 Venice has a severe lack of affordable 8 and supportive housing due to a loss of rent- 9 stabilized and subsidized units, and the lack of 10 any 100 percent affordable development over the 11 last 20 years. Soon the eviction moratorium will 12 be lifted, and the homelessness issue will get 13 worse. The answer to the homeless crisis is 14 housing. Please support this project. Thank 15 you.</p> <p>16 DIEGO VASQUEZ: Next caller. Theodore, 17 you have been unmuted. Please unmute.</p> <p>18 THEODORE: Yeah. The Reese Davidson 19 Center could be looked upon as a beautification 20 project for a very ugly parking lot. I find it 21 very interesting that none of the opponents are 22 talking about the increase of 50 -- at least 50 23 parking spaces, which would improve beach access.</p> <p>24 On top of that, 140 units would do a 25 tremendous amount to solve the unhoused/homeless</p> <p style="text-align: right;">Page 101</p>

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<p>1 problem that I see everyday where I live on  2 Dudley Avenue, which has only gotten worse in the  3 50 years that I have been in Venice. I'm really  4 struck by the proliferation of birds in the bush  5 proposals by the opponents when this is a very  6 concrete and well-thought-out beautiful project  7 that can restore the diversity in Venice that was  8 here when Oakwood was a minority community. I  9 support the project.</p> <p>10 PRESIDENT SAMANTHA MILLMAN: Thank you.</p> <p>11 DIEGO VASQUEZ: Next caller. Caller  12 507, you have been unmuted. You can unmute by  13 pressing star 6. (Indiscernible)?</p> <p>14 MIKE BRAVO: Hello. Yes, that's -- hi.  15 Thank you. My name is Mike Bravo. I'm a fifth  16 generation Venetian. I'm also indigenous rights  17 and civil rights activist here in Venice and in  18 California. No disrespect to the VNC, but to the  19 few people good on there, but it doesn't  20 represent the makeup of the community in no  21 shape, form, or fashion at all.</p> <p>22 And also, many people from the Venice  23 Vision and the chamber who have called in been  24 advocates for projects that carry the same  25 attributes that they allege about the Reese</p> <p style="text-align: right;">Page 102</p>	<p>1 PRESIDENT SAMANTHA MILLMAN: Thank you.</p> <p>2 DIEGO VASQUEZ: Next caller. Caller  3 115, you have been unmuted. Please unmute. You  4 can unmute by pressing star 6.</p> <p>5 RUTH GOLDWAY: Thank you. My name is  6 Ruth Goldway. I'm a 20-year resident and  7 homeowner in Venice. I live just a few blocks  8 from the proposed development. I'm fully in  9 support of it.</p> <p>10 You should come by and see this lot  11 that all these opponents want to preserve. It's  12 an eyesore of the worst kind. It blocks access  13 to the headwaters of the canal. It's not use  14 very often except perhaps on one or two big  15 holidays. Putting mixed-use housing, additional  16 spots, better access to the canal, and solving or  17 starting to solve one of the major crises of our  18 time is just so important.</p> <p>19 And the reason this housing may be more  20 expensive than it ought to is because of the  21 delays that have been put upon it by these people  22 who have opposed it for so long. Let's move  23 forward quickly, get this project approved, build  24 this housing, and let's remember Rick Davidson  25 who was an architect himself and a devoted</p> <p style="text-align: right;">Page 104</p>
<p>1 Davidson. And they've also been complicit with  2 the displacement of the local black and  3 indigenous community here in Venice and in our  4 town. You know, and I have critiques about some  5 of the aspects of this project, but we need  6 housing ASAP and I hope you'll approve this  7 project. Thank you.</p> <p>8 PRESIDENT SAMANTHA MILLMAN: Thank you  9 so much.</p> <p>10 DIEGO VASQUEZ: Next caller. Caller  11 702, you have been unmuted. You can unmute by  12 pressing star 6. Please proceed.</p> <p>13 ANGIE BROOKS: Hi. Angie Brooks. I've  14 been a Venice resident for 30 years, and I  15 strongly support this project. I live a few  16 blocks away. I'm also an architect who works  17 with many non-profits building affordable housing  18 because it makes neighborhoods better.</p> <p>19 Homes and homelessness, and access to  20 housing should be a right and not a privilege.  21 This project continues the Venetian tradition of  22 a rich combination of art, public space,  23 affordable housing, diversity, and beach access  24 making it a model for other communities. Thank  25 you.</p> <p style="text-align: right;">Page 103</p>	<p>1 supporter --</p> <p>2 PRESIDENT SAMANTHA MILLMAN: Time. I'm  3 so sorry to cut you off. We have 37 minutes and  4 36 speakers, and I'd like to try to get to  5 everyone. So please be mindful of the clock.  6 Thank you.</p> <p>7 DIEGO VASQUEZ: Next caller. Suzanne  8 Thompson, you have been unmuted. Please unmute.  9 Suzanne Thompson, you have been unmuted. Please  10 unmute.</p> <p>11 SUZANNE THOMPSON: Hello? Can you hear  12 me?</p> <p>13 PRESIDENT SAMANTHA MILLMAN: Go ahead.</p> <p>14 SUZANNE THOMPSON: Hi. I've lived in  15 Venice -- I lived in Venice for 37 years, and  16 recently had to relocate because I couldn't  17 afford to live there. There wasn't affordable  18 housing for me. I'm a past president. I was the  19 second president of the Grass Roots Venice  20 Neighborhood Council. I was elected in 2'04, and  21 I'm cochairman of Venice Arts Council, which was  22 formed in 2'05, and I'm a charter member of the  23 Venice Japanese-American Memorial Monument  24 Committee, which started in 2010.</p> <p>25 We wholeheartedly support -- the Venice</p> <p style="text-align: right;">Page 105</p>

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<p>1 Arts Council wholeheartedly supports this 2 organization. They do support us as their 3 physical sponsor, but I have known them and 4 volunteered for them for several years, and 5 they're an excellent organization. Steve Claire, 6 the founding director, laid a foundation for 7 Becky to grow on and has done a fabulous job. 8 And I agree with especially what Amy Goldstein 9 said about people -- the things that they're 10 saying.</p> <p>11 PRESIDENT SAMANTHA MILLMAN: Time. 12 SUZANNE THOMPSON: I have also lived in 13 the canals, and the canals have --</p> <p>14 PRESIDENT SAMANTHA MILLMAN: Time. I'm 15 so sorry.</p> <p>16 DIEGO VASQUEZ: Next caller. Caller 17 166, you have been unmuted. Please unmute. You 18 can unmute by pressing star 6.</p> <p>19 SUSAN MILMAN: Hello. My name is Susan 20 Milman. No relation to Samantha. I am a 50-year 21 Venice resident and property owner. I 22 enthusiastically support RDC. I have witnessed 23 Venice (inaudible) stripping the economic and 24 racial diversity that made it unique.</p> <p>25 Now we face skyrocketing rents,</p> <p style="text-align: right;">Page 106</p>	<p>1 family housing for the homeless housing artists 2 all together. How Venice of us, you know? And 3 it'd be great to, like, take the grandkids to a 4 workshop in the public space within this 5 community to learn from some artists who live 6 there. Would that be cool? Anyhow, I totally 7 support this housing for people, not for profit. 8 And thank you very much for your time.</p> <p>9 PRESIDENT SAMANTHA MILLMAN: Thank you. 10 DIEGO VASQUEZ: Caller. Caller 63, you 11 have been unmuted. Please unmute.</p> <p>12 CHUCHECK BRICO: Hi there. My name is 13 Chuccheck Brico, and I've lived in Venice for over 14 25 years. I support the Reese Davidson Community 15 apartments because I think it will be safe and 16 also good for the diversity of our community. 17 I'm a homeowner, and for 21 of those 25 years 18 I've lived right next door to one of the other 19 VCH affordable housing apartment buildings on 20 Brooks Avenue.</p> <p>21 The families living there are hard- 22 working. They're devoted to their families. 23 I've watched them raise their kids, heard their 24 laughter. I've created friendships with them, 25 and these kids have now grown up and they're</p> <p style="text-align: right;">Page 108</p>
<p>1 overcrowding, and a shameful rise of unhoused 2 people exacerbated by the pandemic. Stand 3 against nimbyism. Low-income housing is the 4 ultimate remedy to homelessness. It saves lives. 5 We have 136 low-income units. That's probably 6 250 people, artists unhoused, families. And I 7 look forward and a resident very close to 8 enjoying the Gregory Hines Community arts center. 9 It's a --</p> <p>10 PRESIDENT SAMANTHA MILLMAN: Time. 11 That is your time. I'm sorry. And again, to 12 reiterate, I have no relation to Susan Millman. 13 Different spelling.</p> <p>14 DIEGO VASQUEZ: Next caller. 15 (Indiscernible), you have been unmuted. Please 16 --</p> <p>17 MIKE FRIEND: Hi. My name is Mike 18 Friend. I'm a 45-year resident and 33-year 19 volunteer with Venice Community Housing. I 20 totally support the Reese Davidson Community. 21 One thing is both Rick Davidson and -- was an 22 architect and a poet and an artist, and Arthur 23 Reese was an artist way back when, and Gregory 24 Hines will be honored by this development. 25 It's the first time we get to combine</p> <p style="text-align: right;">Page 107</p>	<p>1 independent adults. I have children of my own, 2 teenagers, who I know have gained from living in 3 a diverse neighborhood like Venice. It's what 4 drawn my husband and I to want to raise them here, 5 and I think it's important that we take care of 6 our citizens in need and be a model for other 7 neighborhoods and cities, not only in Los 8 Angeles, but across the state and the country.</p> <p>9 PRESIDENT SAMANTHA MILLMAN: Time. 10 CHUCHECK BRICO: Let's keep doing --</p> <p>11 PRESIDENT SAMANTHA MILLMAN: Thank you 12 so much.</p> <p>13 DIEGO VASQUEZ: Margaret, you have been 14 unmuted. Please unmute.</p> <p>15 MARGARET: Hello. Thank you. Venice 16 Neighborhood Council is advisory only and has 17 been captured for many years by the Chamber of 18 Commerce. So keep that in mind when you rear 19 your negative comments. They don't particularly 20 represent the multi-generational community in any 21 way whatsoever.</p> <p>22 On March 8, 2019, the California 23 Coastal Commission passed the Environmental 24 Justice Policy that requires equity and coastal 25 access, including housing access. This is a</p> <p style="text-align: right;">Page 109</p>



<p>1 perfect project. The naysayers have a lot to  2 say, but the fact is that if we could prioritize  3 repatriation of the black and indigenous multi-  4 generational community who have been pushed out  5 of Venice by systemic racist, including  6 restrictive covenant, redlining, pace, reap,  7 broken windows, code enforcement.  8 I think you're all planning-related.  9 You know what this is. This is not an accident  10 just, you know, by design. This is the same  11 commodifiers who are naysaying the project.  12 Please support it.  13 PRESIDENT SAMANTHA MILLMAN: Time.  14 Thank you.  15 DIEGO VASQUEZ: Next caller. Adam, you  16 have been unmuted. Please unmute.  17 ADAM COWING: Hi. My name is Adam  18 Cowing and I'm a Venice resident. I strongly  19 support the Reese Davidson Community because the  20 homelessness and housing costs are obviously  21 urgent issues in our community.  22 We won't solve these issues without  23 creating more homes. This building housing, and  24 in particular affordable housing. And every  25 neighborhood needs to do what it can where it</p> <p style="text-align: right;">Page 110</p>	<p>1 And Venice, it will be a great addition  2 in Venice to just help better the community.  3 Please do not listen to the wealthy Venice  4 residents who despise homelessness and just look  5 the other way. We all deserve a better chance to  6 live in a beautiful community. I urge you to  7 please approve this project, and help us improve  8 Venice, and help with racial equity and housing.  9 Thank you.  10 PRESIDENT SAMANTHA MILLMAN: Thank you.  11 DIEGO VASQUEZ: Next caller. Caller  12 033, you have been unmuted. Please unmute. You  13 can unmute by pressing star (sound drop). Caller  14 --  15 MIRA LOPEZ NEWBURY: Hi.  16 DIEGO VASQUEZ: -- 033 --  17 MIRA LOPEZ NEWBURY: Hi. Can you hear  18 me?  19 PRESIDENT SAMANTHA MILLMAN: Loud and  20 clear. Please go ahead.  21 MIRA LOPEZ NEWBURY: Hi. My name is  22 Mira Lopez Newbury. I'm calling in because I  23 have lived in Venice my entire life and I now  24 work at Venice Community Housing. And I want to  25 express my strong support for the Reese Davidson</p> <p style="text-align: right;">Page 112</p>
<p>1 can. Venice community housing is a local non-  2 profit with a proven track record, and I know  3 they'll pursue this project with care and for  4 concern -- with concern for our community. Thank  5 you.  6 PRESIDENT SAMANTHA MILLMAN: Thank you.  7 DIEGO VASQUEZ: Next caller. Caller  8 Lupe Garcia, you have been unmuted. Please  9 unmute.  10 LUPE GARCIA: Hi. My name is Lupe  11 Garcia and I'm 23 years old. I've grown up in  12 Venice my whole entire life. I am unable to  13 afford the rent. I had to move closer to the  14 downtown area. I just really want to urge the  15 City Commissioners to open up your hearts and  16 understand that the life-changing experience that  17 individuals may get from just being able to live  18 in Venice.  19 Also, Venice should be accessible to  20 all individuals, not just wealthy individuals, or  21 foreigners. Parking is not more important. The  22 cost of the building is not more important. The  23 most important thing is the 140 opportunities for  24 a better life. That is what Reese Davidson  25 Community will do for all individuals in need.</p> <p style="text-align: right;">Page 111</p>	<p>1 Community, which is an incredible project that  2 will bring much-needed affordable housing to the  3 neighborhood.  4 This project honors Venice's  5 (indiscernible) home to artists and people from  6 all backgrounds and walks of life, and I know  7 that it will strengthen our community in the best  8 ways. I'm so proud to support it and work at  9 VHC. Thank you.  10 PRESIDENT SAMANTHA MILLMAN: Thank you.  11 MIRA LOPEZ NEWBURY:  12 DIEGO VASQUEZ: Next caller. Caller  13 463, you have been unmuted. Please unmute. You  14 can unmute yourself by pressing star 6. Caller  15 463, you have been unmuted.  16 Moving on, caller Rick Garvey, you have  17 been unmuted. Please unmute.  18 RICK GARVEY: Hi. Thank you very much,  19 President and Commissioners, for your time today.  20 My name is Rick Garvey. I am a 25-year Venice  21 homeowner and resident. I live about five blocks  22 from the proposed site, and I strongly support  23 this project, and I hope you will too.  24 We've been working to try to get this  25 bill for many years. And when the Mayor's Office</p> <p style="text-align: right;">Page 113</p>

<p>1 decided about five years ago that we needed to 2 identify city-owned property to build affordable 3 housing, I credit Councilman Bonan for putting 4 together this proposal for both the Venice Median 5 and the Thatcher Yards.</p> <p>6 Thatcher's been approved and it's 7 moving forward. I'm excited for this project to 8 move forward as well. I'm also a public health 9 researcher at the Rand Corporation, and I've 10 spent my entire career working with homeless 11 populations. I can't tell you how much people's 12 lives change when they receive permanent housing. 13 I have worked with people downtown on Skid Row 14 Housing Trust properties, and I've seen the 15 amazing results of this type of property. I 16 can't wait to have one in my neighborhood, and I 17 hope that you support it. Thank you so much for 18 your time today.</p> <p>19 PRESIDENT SAMANTHA MILLMAN: Thank you.</p> <p>20 DIEGO VASQUEZ: Next caller. Caller 21 Catherine J., you have been unmuted. Please 22 unmute.</p> <p>23 CATHERINE JADA: Hello. My name is 24 Catherine Jada. I'm a VCH tenant, and I am in 25 support of VCH housing because VCH has given me a</p> <p style="text-align: right;">Page 114</p>	<p>1 of, I don't know, the housing crisis, the income 2 and equality crisis with rising -- usually rising 3 house costs, home costs, rental costs around me, 4 as well as the huge number of people without 5 housing.</p> <p>6 And I just feel so grateful to the 7 Reese Davidson Community and for VCH, which has 8 thought ahead and is doing great work. And our 9 shape -- you know, they're just rescuing this 10 unsightly parking lot, which never counted as 11 open space. And we have the beach there, and 12 people can go to it. And everyone should enjoy 13 it, and everyone should have homes. Thank you.</p> <p>14 PRESIDENT SAMANTHA MILLMAN: Thank you.</p> <p>15 DIEGO VASQUEZ: Next caller. Caller 16 Nancy, you have been unmuted. Please unmute.</p> <p>17 NANCY ZUBERI: Hello. My name is Nancy 18 Zuberi. I've owned a home in Venice since 1997. 19 My children grew up in this community, and I 20 taught at Venice High School for more than 20 21 years. Many of my fellow teachers there could 22 not afford to live in Venice.</p> <p>23 I support the Reese Davidson project 24 because it provides affordable housing in a city 25 that is increasingly unaffordable. Venice has</p> <p style="text-align: right;">Page 116</p>
<p>1 lot of stability, and it has allowed me to do a 2 lot of things and accomplish a lot of goals. 3 Thank you.</p> <p>4 PRESIDENT SAMANTHA MILLMAN: Thank you.</p> <p>5 DIEGO VASQUEZ: Caller 161, you have 6 been unmuted. Please unmute. You can unmute by 7 pressing star 6. Caller 161, you have been 8 (sound drop).</p> <p>9 NAOMI GLOVERMAN: Yes. Can you hear me 10 now?</p> <p>11 DIEGO VASQUEZ: Yes. Proceed.</p> <p>12 NAOMI GLOVERMAN: Star 6.</p> <p>13 PRESIDENT SAMANTHA MILLMAN: Oh. Press 14 star 6 one more time (indiscernible).</p> <p>15 NAOMI GLOVERMAN: Okay.</p> <p>16 PRESIDENT SAMANTHA MILLMAN: There you 17 go.</p> <p>18 NAOMI GLOVERMAN: Thank you. Okay. My 19 name is Naomi Gloverman. I've lived in Venice 20 for 45 years. My children graduated Venice High 21 School, and they're better people for having 22 grown up here I have to say. I'll give myself 23 some credit, but I will give Venice a lot.</p> <p>24 We lived half a block from Oceanfront 25 Walk, so I know well that I'm in the epicenter</p> <p style="text-align: right;">Page 115</p>	<p>1 always been known for its diversity, something 2 that I have always appreciated. Gentrification 3 has greatly decreased in its diversity, while 4 this project will support that diversity. We 5 need to provide housing in Venice for people from 6 all socioeconomic levels. Thank you.</p> <p>7 PRESIDENT SAMANTHA MILLMAN: Thank you.</p> <p>8 DIEGO VASQUEZ: Next caller. Caller 9 Carol Wells, you have been unmuted. Please 10 unmute.</p> <p>11 CAROL WELLS: Can you hear me?</p> <p>12 PRESIDENT SAMANTHA MILLMAN: Loud and 13 clear. Go ahead, please.</p> <p>14 CAROL WELLS: Thank you. My name is 15 Carol Wells. I've lived in Venice since 1967, 16 both as a renter and homeowner. I strongly 17 support Reese Davis Community. It creatively 18 addresses needs of the unhoused and low income 19 people, and will increase equity and diversity.</p> <p>20 We are in the middle of a housing 21 crisis, which is only getting worse. This 22 project is important, and it is needed. No 23 project is ever perfect, but we cannot let the 24 perfect be the enemy of the good. Please support 25 this project.</p> <p style="text-align: right;">Page 117</p>

30 (Pages 114 - 117)

<p>1 I also support Venice Community Housing 2 for their many years of working to protect and 3 create affordable housing in Venice. Thank you. 4 PRESIDENT SAMANTHA MILLMAN: Thank you. 5 DIEGO VASQUEZ: Next call. Caller 056, 6 you have been unmuted. Please unmute. You can 7 unmute by pressing star 6. Caller 056, you have 8 been unmuted. Please unmute. 9 MICHAEL LILLY: My name is Michael 10 Lilly. I'm chapter president of Veterans of 11 Peace, Los Angeles. I'm also on the Board of 12 Venice Community Housing. This is a needed 13 project in Venice. We can't have these tents all 14 over Venice. Reese Davis project is the answer 15 to our problems in -- on -- for the unhoused, so 16 I hope you support this project. And thank you, 17 and peace. 18 PRESIDENT SAMANTHA MILLMAN: Thank you. 19 DIEGO VASQUEZ: Next caller. Caller 20 Emily Winters, you have been unmuted. Please 21 unmute. 22 EMILY WINTERS: I'm Emily Winters. I'm 23 a 58-year resident of Venice. I have watched the 24 community disappear due to gentrification where 25 multi-family units, like two and four units, have</p> <p style="text-align: right;">Page 118</p>	<p>1 members of this Commission for hearing from 2 everyone today and truly listening to the voices 3 of compassion, empathy, and understanding. I 4 just think it bodes worth mentioning that so many 5 people who will truly benefit directly from this 6 project will not have an opportunity to be heard 7 from their perspective about what this will mean 8 in their lives. 9 And so while we think about a community 10 that's been heard today, I just want to hold a 11 space for the members of this community who will 12 not be heard who will directly benefit from this. 13 Thank you so much. 14 PRESIDENT SAMANTHA MILLMAN: Thank you. 15 DIEGO VASQUEZ: Next caller. Caller 16 163, you have been unmuted. Please unmute. You 17 can unmute by pressing star 6. Caller 163, 18 please unmute. 19 ED FERREIRA: Hello? Hello? 20 PRESIDENT SAMANTHA MILLMAN: Hello. Go 21 ahead. 22 ED FERREIRA: My name is Ed Ferreira. 23 I'm a long-time resident of Venice. I bought my 24 house, lucky enough, way back in the 70s, and I 25 support diversity in the Venice community</p> <p style="text-align: right;">Page 120</p>
<p>1 been torn down for a single family residence that 2 looks like a fortress with a high fence and no 3 windows, just walls. 4 So, speaking of ugly, look around you, 5 some of you. I want to say that when you lose 6 community -- when you lost housing, you lose 7 community, and we have been losing a lot of our 8 artists. This the only art-oriented housing 9 facility ever that I know of in Los Angeles, so 10 we should support it. I approve of it. I'm co- 11 founder of the Venice Arts Council, and a member 12 of the Venice Japanese Memorial Monument 13 Committee. Thank you. 14 PRESIDENT SAMANTHA MILLMAN: Thank you. 15 DIEGO VASQUEZ: Next call. Caller 16 Chelsea Beyers, you have been unmuted. Please 17 (sound drop). 18 CHELSEA BEYERS: Thank you so much. 19 Good afternoon, Commissioners, President Millman. 20 I just want to express my full support of this 21 housing. This brings an incredible new resource 22 for this space in Venice that will improve the 23 quality of life for all members of this 24 community. 25 I want to extend deep appreciation to</p> <p style="text-align: right;">Page 119</p>	<p>1 housing. And they indirectly are fighting 2 gentrification, but what they do is great, and I 3 totally support it. Thank you. 4 PRESIDENT SAMANTHA MILLMAN: Thank you. 5 DIEGO VASQUEZ: Next caller. Caller 6 764, you have been unmuted. Please unmute. You 7 can unmute by pressing star 6. 8 ROXANNE STEINBERG: Hi. Hi. My name 9 is Roxanne Steinberg, and I'm a Venice resident 10 since 1985. I live with my husband and two sons, 11 who were both born and raised and schooled in 12 Venice. I'm president of Body Weather 13 Laboratory, a non-profit organization based in 14 Venice, and my mother's a homeowner in Venice. 15 As artists, designers, architects, and 16 dancers, we are in strong support of this 17 considerate, well-designed project. Venice is 18 one of the most under-funded, under-served areas 19 for the arts and artists in Los Angeles. Artists 20 are needing to leave because they cannot afford 21 to live and work here anymore. This project is a 22 beacon to design that integrates life, art, and 23 culture while supporting those in need. Venice 24 Community Housing projects are successful and 25 exemplary. Thank you.</p> <p style="text-align: right;">Page 121</p>

31 (Pages 118 - 121)

<p>1 PRESIDENT SAMANTHA MILLMAN: Thank you.</p> <p>2 DIEGO VASQUEZ: Next caller Juntune</p> <p>3 Valentine, you have been unmuted. Please unmute.</p> <p>4 Juntune Valentine, you have been unmuted. Please</p> <p>5 unmute.</p> <p>6 Moving on. Caller 255, you have been</p> <p>7 unmuted. Please unmute. You can unmute by</p> <p>8 pressing star 6. Please proceed.</p> <p>9 PRESIDENT SAMANTHA MILLMAN: Caller</p> <p>10 255, is it possible that you're muted on your</p> <p>11 end? Because it's showing that you're unmuted on</p> <p>12 our end.</p> <p>13 FARRAH MARRIS: Can you hear me?</p> <p>14 PRESIDENT SAMANTHA MILLMAN: Now we can</p> <p>15 hear you. Welcome.</p> <p>16 FARRAH MARRIS: Thank you. My name is</p> <p>17 Farrah Marris. I'm an L.A. city resident. An</p> <p>18 average of five homeless people die on the</p> <p>19 streets of L.A. everyday. Stopping these deaths</p> <p>20 must be our top priority. Venice is ground zero</p> <p>21 for gentrification with the placement of</p> <p>22 homelessness.</p> <p>23 This project is the first affordable</p> <p>24 housing (indiscernible) in Venice, which</p> <p>25 historically is an artist community, and I will</p> <p style="text-align: right;">Page 122</p>	<p>1 better way to solve this problem than by building</p> <p>2 affordable housing with a 55-year covenant. We</p> <p>3 need this project in Venice. Please vote in</p> <p>4 favor of it. Thank you very much.</p> <p>5 PRESIDENT SAMANTHA MILLMAN: Thank you.</p> <p>6 DIEGO VASQUEZ: Next caller. Caller</p> <p>7 924, you have been unmuted. You can unmute by</p> <p>8 pressing star 6.</p> <p>9 LAURIE PINKUS: Can you hear me okay?</p> <p>10 PRESIDENT SAMANTHA MILLMAN: Loud and</p> <p>11 clear. Please go ahead.</p> <p>12 LAURIE PINKUS: My name is Laurie</p> <p>13 Pinkus. I am totally in favor of this project</p> <p>14 for having an affordable price -- affordable</p> <p>15 housing crisis, and we need to build as much</p> <p>16 affordable housing as we can. This is an</p> <p>17 excellent project. Please support it.</p> <p>18 PRESIDENT SAMANTHA MILLMAN: Thank you.</p> <p>19 DIEGO VASQUEZ: Next caller. Caller</p> <p>20 Kay Galen, you have been unmuted. Please unmute.</p> <p>21 Kay, you have been unmuted. Please unmute.</p> <p>22 KAY GALEN: Hi. Hi, I'm Kay Galen, and</p> <p>23 I'm a long-time supporter of VCH and I support</p> <p>24 the Reese Davidson Community and everything that</p> <p>25 it does. It services the community, all their</p> <p style="text-align: right;">Page 124</p>
<p>1 hope prevent the elimination of black,</p> <p>2 indigenous, and working class people in the</p> <p>3 neighborhood. That's why I strongly support the</p> <p>4 Reese Davidson project adding 140 units to this</p> <p>5 larger scale than previously possible in Venice.</p> <p>6 Housing is a human right. Permanent</p> <p>7 housing opportunities or by community non-profits</p> <p>8 bring us closer to a home guaranteed. But the</p> <p>9 project also creates useful open space along the</p> <p>10 canal, which is preferable to the current parking</p> <p>11 lot and parking will not be lost overall. Thank</p> <p>12 you.</p> <p>13 PRESIDENT SAMANTHA MILLMAN: Thank you.</p> <p>14 DIEGO VASQUEZ: Caller Sylvia, you have</p> <p>15 been unmuted. Please unmute.</p> <p>16 SYLVIA AROSS: Hi. My name is Sylvia</p> <p>17 Aross. I am a 50-year-plus resident of Venice,</p> <p>18 part renter and part homeowner. I was very</p> <p>19 saddened to hear my neighbors' opposition to this</p> <p>20 project. It is undeniable that there is a</p> <p>21 housing shortage in Los Angeles in general and</p> <p>22 Venice in particular.</p> <p>23 And more importantly, a devastating</p> <p>24 shortage of affordable housing. How else can we</p> <p>25 have diverse and healthy communities? What</p> <p style="text-align: right;">Page 123</p>	<p>1 efforts, all of their work services. Not only</p> <p>2 their -- the people involved in their -- I've</p> <p>3 been on the phone so long I can't remember</p> <p>4 anything. Sorry.</p> <p>5 Support not only the people they</p> <p>6 immediately support, but the community as a</p> <p>7 whole. Homelessness is obviously a very</p> <p>8 tremendous issue that's in need of addressing,</p> <p>9 and VCH Reese Davidson Community will address</p> <p>10 that issue. Please support the Reese Davidson</p> <p>11 Community project. Thank you.</p> <p>12 PRESIDENT SAMANTHA MILLMAN: Thank you.</p> <p>13 DIEGO VASQUEZ: Caller U693CL, you have</p> <p>14 been unmuted. Please unmute. Caller U693CL, you</p> <p>15 have been unmuted. Please unmute.</p> <p>16 Moving on. Caller Ingrid Muller, you</p> <p>17 have been unmuted. Please unmute. Ingrid,</p> <p>18 please unmute. Call Ingrid, please --</p> <p>19 INGRID MULLER: I'm here.</p> <p>20 DIEGO VASQUEZ: Okay. Please proceed.</p> <p>21 INGRID MULLER: Can you hear me?</p> <p>22 DIEGO VASQUEZ: Yes.</p> <p>23 PRESIDENT SAMANTHA MILLMAN: Go ahead.</p> <p>24 INGRID MULLER: All righty. I feel</p> <p>25 like a babe in the woods listening to all these</p> <p style="text-align: right;">Page 125</p>

<p>1 wonderful long-time Venice voices, a lot of which</p> <p>2 I know by now. I moved into the now-landmarked</p> <p>3 Lincoln Place Apartments in 1988 as an empty-</p> <p>4 nester, but soon found myself to become an</p> <p>5 affordable housing and supportive housing</p> <p>6 advocate, and I certainly still am.</p> <p>7 I'm a total fan of VCHC. And just</p> <p>8 looking at their past projects and the success</p> <p>9 stories I heard are -- I want to hear more. I</p> <p>10 also want to go to that community gallery at the</p> <p>11 Reese Davidson Community place and look at the</p> <p>12 work by the artists that are then-housed, and</p> <p>13 maybe we can all share our artistic expressions</p> <p>14 together. Please support this project. It's</p> <p>15 going to do a whole lot of good, not just for the</p> <p>16 new tenants there, but for the whole of Venice</p> <p>17 and Los Angeles as a whole.</p> <p>18 PRESIDENT SAMANTHA MILLMAN: Time.</p> <p>19 INGRID MULLER: (Indiscernible)</p> <p>20 PRESIDENT SAMANTHA MILLMAN: Thank you.</p> <p>21 DIEGO VASQUEZ: Next caller. Caller</p> <p>22 Jordan F., you have been unmuted. Please unmute.</p> <p>23 Jordan --</p> <p>24 JORDAN FANERIS: Can you hear me?</p> <p>25 DIEGO VASQUEZ: Yes.</p> <p style="text-align: right;">Page 126</p>	<p>1 hear me?</p> <p>2 PRESIDENT SAMANTHA MILLMAN: Loud and</p> <p>3 clear. Go ahead.</p> <p>4 THEODORE PATTEN: Okay. First of all,</p> <p>5 thank you, President Millman and the Board, for</p> <p>6 allowing me to speak. The purpose of bridge</p> <p>7 housing is to move people out of shelters into</p> <p>8 supportive houses. And from there to Section 8</p> <p>9 housing. This allows others to move into their</p> <p>10 -- that position -- that apartment where they</p> <p>11 once held.</p> <p>12 And -- excuse me. This program works</p> <p>13 because I was once a person who lived in bridge</p> <p>14 housing and through supportive housing, and now I</p> <p>15 have my own apartment from Section 8 housing.</p> <p>16 And now I'm advocating for the homelessness. So</p> <p>17 I'm asking that you pass this bill. Allow these</p> <p>18 apartments to be built into the Venice area.</p> <p>19 We cannot allow this not to be built</p> <p>20 here and have all the other cities to build these</p> <p>21 homes and not Venice. According to HHH that was</p> <p>22 passed by overwhelming of Californians, that</p> <p>23 means that 10,000 units have to be built in each</p> <p>24 city and --</p> <p>25 PRESIDENT SAMANTHA MILLMAN: Time.</p> <p style="text-align: right;">Page 128</p>
<p>1 PRESIDENT SAMANTHA MILLMAN: Yes. Go</p> <p>2 ahead.</p> <p>3 JORDAN FANERIS: Hi. My name is Jordan</p> <p>4 Faneris. I've lived in Venice my entire life,</p> <p>5 and I would like to express my strong support for</p> <p>6 the Reese Davidson project. The current parking</p> <p>7 lot on the site is a blight in the area, and the</p> <p>8 new project would beautify one of the most</p> <p>9 ugliest and rundown corners of the neighborhood</p> <p>10 in addition to providing the critically needed</p> <p>11 housing and social services.</p> <p>12 Much like the Lincoln Apartments,</p> <p>13 another nearby VCH project which was approved</p> <p>14 unanimously by this commission last year, there</p> <p>15 are many people in the community who have come</p> <p>16 forward with nonsensical complaints about how the</p> <p>17 building would endanger their children or give</p> <p>18 them cancer. The Commission recognized those</p> <p>19 complaints were asinine and disingenuous then,</p> <p>20 and it should do so again. Please vote in favor</p> <p>21 of this project. Thank you.</p> <p>22 PRESIDENT SAMANTHA MILLMAN: Thank you.</p> <p>23 DIEGO VASQUEZ: Next caller. Theodore</p> <p>24 Patten, you have been unmuted. Please unmute.</p> <p>25 THEODORE PATTEN: Yes. Are you able to</p> <p style="text-align: right;">Page 127</p>	<p>1 Thank you.</p> <p>2 DIEGO VASQUEZ: Next caller. William</p> <p>3 Wood, you have been unmuted. Please unmute.</p> <p>4 WILLIAM WOOD: Yep. You all can you</p> <p>5 hear me? All right. You know, first I just to</p> <p>6 say thank you, all, everybody for staying on. I</p> <p>7 know it's been a long day for everybody. I'm a</p> <p>8 decades-long resident of Venice. I'm in support</p> <p>9 of this project. It pays respect to the history</p> <p>10 of Venice, some of the founding families and</p> <p>11 historical figures.</p> <p>12 It's an opportunity for a correction</p> <p>13 against gentrification and displacement that's</p> <p>14 been happening. It's an effort towards</p> <p>15 preserving and restoring some of the diversity of</p> <p>16 Venice racially, economically, artistically. I</p> <p>17 know some of the same people who have spoken in</p> <p>18 opposition of this have supported other projects</p> <p>19 of similar size that people can afford to live in</p> <p>20 are long-time generational Venetians, artists</p> <p>21 people can afford to live in.</p> <p>22 And I think maybe a lot of the</p> <p>23 opposition here is who the housing is for or</p> <p>24 intended for. It's an opportunity to help people</p> <p>25 out. I know you all had the equity day. People</p> <p style="text-align: right;">Page 129</p>

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<p>1 have talked about equity. Here's an opportunity  2 to do something about it. Thank you.  3 PRESIDENT SAMANTHA MILLMAN: Thank you.  4 DIEGO VASQUEZ: Caller 222, you have  5 been unmuted. Please unmute. You can unmute by  6 pressing star 6.  7 ROBERT WILLIAMS: Yes. Good afternoon.  8 This is Robert Williams. I work in social  9 services and interface work in Venice, and I  10 strongly support Reese Davidson and Venice  11 Community Housing, their integrity in planning  12 and preparing these affordable and creative  13 options for the unhoused and the low-income.  14 Please support this project. Thank you.  15 PRESIDENT SAMANTHA MILLMAN: Thank you.  16 DIEGO VASQUEZ: Next caller Gale.  17 Gale, you have been unmuted. Please (sound  18 drop).  19 GALE CLIGMAN: Hello? Can you hear me?  20 DIEGO VASQUEZ: Yes.  21 PRESIDENT SAMANTHA MILLMAN: (sound  22 drop) clear. Please go ahead.  23 GALE CLIGMAN: So my name is Gale  24 Cligman and I'm a resident of several decades in  25 Venice, and I am in strong support of Reese</p> <p style="text-align: right;">Page 130</p>	<p>1 STEVE CLARE: Hello. My name is Steve  2 Clare. I'm a 50-year Venice resident and a  3 homeowner here. I fully and enthusiastically  4 support the Reese Davidson community. Over the  5 years, Venice, like many other Los Angeles  6 neighborhoods, has gentrified and (indiscernible)  7 moderate income. Renters have been pushed out of  8 Venice or onto the streets and public spaces in  9 our community.  10 We're now in the midst of a horrific  11 city-wide affordable housing crisis, which this  12 project perfectly well addresses. It will  13 provide permanent housing and on-site supportive  14 services for 136 no- and low-income households,  15 likely over 250 people. It will also provide  16 community-serving commercial space and exhibit  17 space for low-income artists and residents, and  18 it will retain some expanse onsite public  19 housing. Pardon me, public parking.  20 It will enhance access to the iconic  21 Venice canals. It is truly a win, win, win for  22 the unhoused, for the Venice community, and for  23 the city as a whole. Thank you.  24 PRESIDENT SAMANTHA MILLMAN: Thank you.  25 DIEGO VASQUEZ: Caller Mary Jane</p> <p style="text-align: right;">Page 132</p>
<p>1 Davidson. And I'm frankly appalled by the  2 obstacles and opposition to an initiative that  3 will better lives, better our streets, and better  4 our Venice communities.  5 Venice has become obscenely overpriced,  6 as well as much more intolerant. We need more  7 affordable and supportive housing for our fellow  8 citizens, among whom are those with lesser  9 incomes and opportunities, those who are unhoused  10 for a variety of reasons, and not primarily for  11 drug addictions as some seem to imply, as well as  12 artists, who have long been a vital part of  13 Venice's vibrant identity.  14 Reese Davidson will enhance what is  15 presently an under-used, ugly space, and will do  16 so for the greater good of us all. I really hope  17 that we will go forward on this much-needed  18 endeavor. And I also want to thank all of those  19 who have put so much hard work to bring this  20 project to fruition. And I hope that it will be  21 voted forward. Thank you.  22 PRESIDENT SAMANTHA MILLMAN: Thank you.  23 DIEGO VASQUEZ: Next caller. Caller  24 127, you have been unmuted. Please unmute. You  25 can unmute by pressing star 6.</p> <p style="text-align: right;">Page 131</p>	<p>1 Waglay, you have been unmuted. Please unmute.  2 MARY JANE WAGLAY: Hi. Thank you so  3 much for listing my name as Mary Jane Waglay.  4 I'm a resident of Linney Canal, about two and a  5 half blocks away from he proposed development. I  6 am strongly in support of it. It is absolutely  7 needed to help us house the homeless across the  8 -- across our community, but also to, as many  9 have said, to reinstate the level of diversity  10 economically, as well as racially, that used to  11 exist in Venice and needs to continue.  12 The gestures toward the arts and toward  13 opening up the canal and towards green space are  14 all so wonderful. Please vote in favor. thank  15 you.  16 PRESIDENT SAMANTHA MILLMAN: Thank you.  17 DIEGO VASQUEZ: Next caller Roses  18 Furalay, you have been unmuted. Please unmute.  19 RACHEL ROSE LOCKHEED: Yeah, good  20 afternoon. Rachel Rose Lockheed. This  21 development is a significant opportunity to honor  22 the life of Gregory Hines and the gifts he left  23 to us all and to honor the legacy of Arthur Reese  24 and his impact on Venice.  25 The city and the Venice community</p> <p style="text-align: right;">Page 133</p>

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<p>1 continue to see a growing housing and 2 homelessness crisis, which won't be resolved 3 unless we can create new housing options like 4 this in every neighborhood, including Venice. 5 Diversity is a key to a healthy neighborhood, and 6 RDC helps Venice recapture some of its historic, 7 economic, and racial diversity.</p> <p>8 The answer to the homeless crisis is 9 housing. We do not have a housing crisis. We 10 have a low-income housing crisis. Venice and all 11 of L.A. needs a home's guarantee permanent 12 supporting housing. Opportunities owned by 13 community non-profits help us to get closer to 14 the home's guarantee. Thank you.</p> <p>15 PRESIDENT SAMANTHA MILLMAN: Thank you. 16 We have time for one more speaker before we go to 17 our elected officers.</p> <p>18 DIEGO VASQUEZ: Rodan, you have been 19 unmuted. Please unmute.</p> <p>20 ALICIA RODAN: Good afternoon. My name 21 is Alicia Rodan. I'm an advocate for 22 homelessness. I have been homeless before, and I 23 would like to see the Reese Davis program used. 24 People needs housing. Children. I've been 25 housed -- homeless with children and</p> <p style="text-align: right;">Page 134</p>	<p>1 have to relearn how to unmute. Good afternoon 2 and thank you for the opportunity to speak. My 3 name is Jacqueline Wagner, and I am the chief of 4 the Asset Management Group in the Office of the 5 CAO. Our office initiated AHOS, which is the 6 Affordable Housing Opportunity Sites program in 7 2016. The purpose of the program was and still 8 is to review all of the city's surplus in 9 underutilized properties for its potential use 10 for affordable housing.</p> <p>11 As of today, there are 12 projects in 12 development through the program. Together they 13 will produce more than 700 units of affordable 14 housing on city-owned land. The project before 15 you now known as Reese Davidson Community was one 16 of the original AHOS sites that was approved in 17 the fiscal year 2016-'17 budget. It was 18 recommended for inclusion in the budget by the 19 Council Office.</p> <p>20 In the fall of 2016, the Office of the 21 CAO issued an RFQ or Request for Qualification, 22 and proposals for the original AHOS site, 23 including this site. There were seven responses 24 for this site; the Venice Community Housing and 25 Hollywood Community Housing Team was selected</p> <p style="text-align: right;">Page 136</p>
<p>1 grandchildren.</p> <p>2 We're not all drug addicts. We're not 3 people that are all going to do crime. We would 4 like housing. People will need housing. I was 5 able to get housing, and I ask you to think about 6 letting people live there. Letting people have a 7 start. Letting people feel dignity.</p> <p>8 It feels good when you have a key to 9 turn, when your children can come home and say 10 that's my home, and they're not being made fun of 11 because they're homeless. Think about it. Give 12 people a chance. Say welcome home. Say I would 13 love you to be here. Part of the art is giving 14 people a chance to live, survive, and feel 15 wanted. Thank you.</p> <p>16 PRESIDENT SAMANTHA MILLMAN: Thank you. 17 Okay. The order for the rest of the day is going 18 to go accordingly. We have Jackie Wagner here 19 from the CAO, so we will have Jackie speak. Then 20 we will have Alix from Venice Neighborhood 21 Council. Then we will hear from Jason Douglas 22 with CD-11, and then we will hear from Azeen with 23 the Mayor's Office. So let's start with the 24 CAO's office.</p> <p>25 JACQUELINE WAGNER: My apologies. I</p> <p style="text-align: right;">Page 135</p>	<p>1 through that competitive process as the most 2 qualified team with the best proposal.</p> <p>3 According to our asset management 4 framework, once a city site is recommended for 5 affordable housing by the Municipal Facilities 6 Committee and approved by the City Council and 7 mayor, then the Housing and Community Investment 8 Department now known as the Housing Department 9 signs an ENA or Exclusive Negotiating Agreement 10 with the developer and then begins working on the 11 details of the development.</p> <p>12 Unfortunately, representatives from 13 (indiscernible), our housing, were unable to 14 attend, and that's why I'm giving a little bit 15 more detail. And I'm going to go in to reiterate 16 some -- a little bit more of the details of the 17 benefits that may or may not have been presented 18 today.</p> <p>19 Reese Davidson Community will include 20 140 affordable and supportive units, 50 percent 21 for formerly homeless households, 25 percent from 22 low-income artists, and 25 percent for other low- 23 income households. The site will also have a 24 community arts center, a small-scale retail, some 25 small-scale retail, public parking, residential</p> <p style="text-align: right;">Page 137</p>

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<p>1 and commercial parking, open space, and multiple 2 opportunities for public art.</p> <p>3       Once the city approval is secured, the 4 project will apply for competitive financing, 5 include the low-income tax housing -- tax credit 6 and Affordable Housing Sustainable Communities 7 grant -- I'm sorry, including the Low-Income 8 Housing Tax Credit and the Affordable Housing 9 Sustainable Communities Grant Program. Our 10 office will continue to work closely with housing 11 and DOT to preserve and improve the public 12 parking that is currently there. And I'm here to 13 answer as many questions as I possibly can.</p> <p>14       PRESIDENT SAMANTHA MILLMAN: Thank you 15 so much for joining us today. If we have 16 questions, we will certainly avail your -- 17 ourselves of your expertise. Thank you for 18 joining us.</p> <p>19       Next I'd like to invite Alix from the 20 Venice Neighborhood Council to speak. And Alix, 21 because you are an elected member of the 22 Neighborhood Council and you have submitted a 23 community impact statement, you will have three 24 minutes.</p> <p>25       ALIX GUCOVSKY: Thank you very much,</p> <p style="text-align: right;">Page 138</p>	<p>1       Waivers include, but are not limited to, in 2 (indiscernible) fees for use of living park.</p> <p>3       Sea level rise. Housing a vulnerable 4 population of residents in a known high-risk 5 flood zone due to sea level rise is extremely 6 irresponsible and dangerous, analogous to 7 building public housing in the lowest parts of 8 New Orleans when a future hurricane storm surge 9 is obviously inevitable. Moreover, this project 10 relies heavily, if not exclusively, on public 11 funding, meaning the tax payer is underwriting 12 the developer's unsuitable site selection and 13 resulting flood risk. Mask (indiscernible) 14 character does not conform to the metrics in the 15 specific plan.</p> <p>16       Abuse of tax payer funding. The 17 estimated cost of this project is staggeringly 18 over 100 million to create 139 low-income units, 19 a price tag of nearly \$750,000 per unit. At this 20 rate, it would cost our city over \$22 trillion to 21 house 30,000 people. When tax payers authorize 22 various tax increases and bond measures to solve 23 the homeless crisis, this surely was not what 24 they had in mind. Taxpayers deserve responsible 25 spending of finite resources to alleviate this</p> <p style="text-align: right;">Page 140</p>
<p>1 Commissioners. My name is Alix Gucovsky. I'm 2 the current chair of the Land Use and Planning 3 Committee for the Venice Neighborhood Council. 4 We've had several both motions and community 5 impact statements on this project. The first 6 motion that we passed on December 17th of 2019 -- 7 or community impact statement was denying the 8 zone change. And the second community impact 9 statement that we passed on October 6th of 2020 10 was a community impact statement demanding a full 11 CEQA review and EIRs.</p> <p>12       The most recent motion that was passed 13 in our May board meeting is as follows. LUPC 14 recommends that the VNC recommend denial of the 15 project as presented due to the following. One, 16 failure to comply with the general plan, coastal 17 plan, LAMC, and Venice-specific plans. The 18 project does not comply with the general plan, 19 specific plan, or coastal plan.</p> <p>20       The VNC has already submitted a CIS 21 recommending denial of the general plan amendment 22 and rezoning request for the specific plan 23 amendment, all of which would be required for 24 this project. Applicant has not demonstrated 25 hardships warranting the ZAA and waiver requests.</p> <p style="text-align: right;">Page 139</p>	<p>1 crisis.</p> <p>2       Next, the underlying land for this 3 project is proposed to be donated to the 4 developers to thriving Venice from large swaths 5 of open space on an extremely high-valued asset. 6 In sum, the project exemplifies a gross waste of 7 tax payer dollars that will not alleviate the 8 immediate needs of relief for our unhoused. Per 9 Judge David O'Connor's recent ruling in federal 10 court, these funds could and should be used for 11 immediate shelter of unhoused residents.</p> <p>12       The humanitarian crisis on the streets 13 of Venice is neither alleviated nor changed for 14 those who can't afford to wait for less expensive 15 housing to be built years later and millions of 16 dollars over budget. Perpetuates an unhoused 17 containment policy. Los Angeles has 18 systematically created a containment zone of 19 homeless housing and service providers and 20 infrastructure all within the Venice area akin to 21 a skid row west. This crush of services and 22 housing can serve as a magnet for more 23 homelessness and crime --</p> <p>24       PRESIDENT SAMANTHA MILLMAN: Time.</p> <p>25       ALIX GUCOVSKY: -- (indiscernible) in</p> <p style="text-align: right;">Page 141</p>

<p>1 this community.</p> <p>2 PRESIDENT SAMANTHA MILLMAN: Thank you</p> <p>3 for your time.</p> <p>4 ALIX GUCOVSKY: Thank you.</p> <p>5 PRESIDENT SAMANTHA MILLMAN: We've</p> <p>6 received your letter. Thank you.</p> <p>7 ALIX GUCOVSKY: Thank you.</p> <p>8 PRESIDENT SAMANTHA MILLMAN: Okay.</p> <p>9 Next -- and I apologize for mispronouncing your</p> <p>10 name, Alix.</p> <p>11 ALIX GUCOVSKY: All good. Everyone</p> <p>12 does.</p> <p>13 PRESIDENT SAMANTHA MILLMAN: Thanks.</p> <p>14 Okay. Let's here from CD-11. Take it away.</p> <p>15 JASON DOUGLAS: Good afternoon,</p> <p>16 Commissioners. Jason Patrick Douglas, Senior</p> <p>17 Planning Deputy with Council District 11, Office</p> <p>18 of Councilmember Mike Bonin. While the</p> <p>19 councilmember will take a fresh look at community</p> <p>20 concerns about the project design and impacts</p> <p>21 when it comes to City Council, Councilmember</p> <p>22 Bonin is a vigorous advocate of solutions to the</p> <p>23 homelessness and a strong proponent of affordable</p> <p>24 housing.</p> <p>25 Accordingly, the councilmember urges</p> <p style="text-align: right;">Page 142</p>	<p>1 look to take all community concerns into account</p> <p>2 and try to deliver a product that can have a wide</p> <p>3 supportive (indiscernible). Thank you.</p> <p>4 PRESIDENT SAMANTHA MILLMAN: Thank you</p> <p>5 so much for being with us today. And with that,</p> <p>6 I'm going to go ahead and close public comment</p> <p>7 and ask staff if there's anything in the last</p> <p>8 two-plus hours that you'd like to respond to.</p> <p>9 IRA BROWN: Yes, President. This is</p> <p>10 Ira Brown, City Planning. First off, I would</p> <p>11 like to address comments raised by Appellant.</p> <p>12 For CEQA, when we're considering CEQA, we look at</p> <p>13 the totality of the project. We would not</p> <p>14 segment the project into (indiscernible) of its</p> <p>15 components. That wouldn't be allowed. So as</p> <p>16 such, the intention would apply to the entire</p> <p>17 project.</p> <p>18 The applicant also asserts that the</p> <p>19 project would result in substantial environmental</p> <p>20 impacts and damage. As stated in the</p> <p>21 recommendation report, subject site is a service</p> <p>22 parking lot with minimal vegetation, and no work</p> <p>23 is proposed in the existing right-of-way or Grand</p> <p>24 Canal, which is an artificially constructed</p> <p>25 waterway with concrete abatements and sidewalks</p> <p style="text-align: right;">Page 144</p>
<p>1 that you approve this project and allow it to</p> <p>2 move forward to Council so they can continue to</p> <p>3 take steps to address the homeless crisis facing</p> <p>4 our city. And with that, the councilmember</p> <p>5 thanks you for your consideration of this item</p> <p>6 today.</p> <p>7 PRESIDENT SAMANTHA MILLMAN: Thank you</p> <p>8 so much. And then lastly, we have a</p> <p>9 representative here from the Mayor's Office.</p> <p>10 AZEEN KHANMALEK: Good afternoon,</p> <p>11 Commissioners. My name is Azeen Khanmalek. I'm</p> <p>12 the Director of Affordable Housing Production at</p> <p>13 Mayor Garcetti's office, and I'll just weigh in</p> <p>14 very briefly to say that as our representative</p> <p>15 from the CAO said, we have been doing a lot of</p> <p>16 work to really find ways to smartly and</p> <p>17 efficiently leverage city resources and city-</p> <p>18 owned property for the construction of affordable</p> <p>19 housing and permanent supportive housing.</p> <p>20 And this site has certainly been one of</p> <p>21 the more interesting and compelling opportunities</p> <p>22 as we have found ways to both provide permanent</p> <p>23 supportive housing and parking, and a number of</p> <p>24 other community amenities. And I'll also echo</p> <p>25 Jason's statement that, you know, we certainly</p> <p style="text-align: right;">Page 143</p>	<p>1 on both sides.</p> <p>2 And as indicated in the biological</p> <p>3 technical study, Exhibit D in the staff</p> <p>4 recommendation, the project is not suitable for</p> <p>5 habitat (indiscernible) for wildlife. As such,</p> <p>6 the project would not result in permanent impact</p> <p>7 to the environmental (indiscernible) habitat area</p> <p>8 and no mitigations are required.</p> <p>9 While the project is located in a flood</p> <p>10 zone, it may be subject to the sea level rise.</p> <p>11 The project must comply with existing regulations</p> <p>12 for development in flood zones as well as</p> <p>13 consistency following the flood hazard management</p> <p>14 specific plan. So in response to the applicant's</p> <p>15 statements regarding public health problems, as</p> <p>16 outlined in the deputy's revised agency's</p> <p>17 termination and appeal report, the proposed</p> <p>18 subdivision and subsequent improvements are</p> <p>19 subject to provisions of Los Angeles Municipal</p> <p>20 Code, including fire codes, planning codes,</p> <p>21 health and safety codes, and building codes. And</p> <p>22 as a result, these will -- these mandated laws</p> <p>23 would ensure that public health and welfare are</p> <p>24 maintained.</p> <p>25 Now to address some of the comments</p> <p style="text-align: right;">Page 145</p>

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<p>1 we've heard from the public in regards to public 2 parking, the project would replace all existing 3 parking spaces and add an additional 27 parking 4 spaces. The existing and proposed city lots 5 supplement existing lots, the existing county 6 lots, that are operated by L.A. County on the 7 beach, and there are over 300 parking spaces. 8 The subject site isn't really an overflow lot for 9 those spaces.</p> <p>10 In addition, an addendum to the parking 11 study that was prepared for L.A. DOT indicates 12 that the structure will meet future demand for 13 the site. And further, L.A. DOT staff is present 14 to answer any additional questions about the 15 parking study.</p> <p>16 In regards to the sidewalks adjacent to 17 the site, the project, the proposed maps, were 18 reviewed by the (indiscernible) engineering, and 19 dedications and easements were required on West 20 Venice Boulevard, South Venice Boulevard, Dell, 21 and Pacific Avenues to ensure that the rights-of- 22 way meets the standard (indiscernible) plan. All 23 of these improvements will be to the satisfaction 24 of the city engineer.</p> <p>25 In regards to the preservation of open</p> <p style="text-align: right;">Page 146</p>	<p>1 So having listened to the presentations and two- 2 plus hours of public comment, I just at least 3 wanted to speak on the record. And ironically, 4 I'm having a call with HCV about housing elements 5 at 3:00 on behalf of 197 cities and continues in 6 our region, so apropos around housing.</p> <p>7 So, first, I just want to say -- I 8 mean, I appreciate that this is a large project 9 and will have impacts one way or the other, 10 whether they are documented environmental impacts 11 or not on the neighbors. And I appreciate the 12 comments and the time and the emotion that we 13 heard from the stakeholders.</p> <p>14 At the same time, I am a fierce 15 supporter of public housing and the city's 16 efforts to use its land to provide much-needed 17 permanent supportive housing. And that was the 18 clear direction and intent of the City in issuing 19 RFP, and I am supportive of that effort. And 20 just a few things.</p> <p>21 I mean, in terms of -- I read through a 22 lot of materials this weekend in preparation for 23 today, and I just want to say, like, I'm hearing 24 on the one hand preserve open space, but really 25 what I hear people wanting is they want parking.</p> <p style="text-align: right;">Page 148</p>
<p>1 space, the certified Venice land use planning of 2 the (indiscernible) sites as a parking lot 3 includes policies and provisions from increased 4 public parking on the existing site, which this 5 project does, and ensures access to the coastal 6 zone, which is the project (indiscernible). The 7 LUP does not envision open space for recreational 8 uses to replace the existing parking lot.</p> <p>9 As such, the designation of 10 (indiscernible) is consistent with the rules and 11 policies of the (indiscernible) use plan. The 12 project also addresses the needs for further 13 housing, public parking, and public recreation. 14 And then just to conclude briefly, the project 15 does provide open space adjacent to the canal 16 providing a gateway, visual gateway, to the rest 17 of the town. So with that, those are all my 18 comments.</p> <p>19 PRESIDENT SAMANTHA MILLMAN: Thank you 20 so much. Okay. We are going to start our 21 Commission Deliberation. Jenna, did you want to 22 kick us off?</p> <p>23 COUNCILMEMBER JENNA HORNSTOCK: Yeah. 24 Thanks. I, unfortunately, have a hard stop at 3 25 p.m. so I may not have the opportunity to vote.</p> <p style="text-align: right;">Page 147</p>	<p>1 And this project is replacing the parking, so I 2 don't think we all -- anybody imagined this site 3 would become a park or some kind of recreational 4 useable open space other than, of course, having 5 access to the canal.</p> <p>6 And so I just -- from what I see and 7 from what I've seen on the record in the 8 testimony and the presentations today, this is 9 maintaining that use, which is the parking, and 10 adding more. And I think forward-thinking 11 parking in terms of reducing footprint of parking 12 with the automated is the future for the City if 13 we need to have more compact development and 14 build out housing in our (indiscernible) area. 15 So I think the parking and the approach to it is 16 novel, and it's what's needed.</p> <p>17 I also picked up a lot of what draws 18 the cost of each project. When there's these 19 statements (indiscernible) housing is expensive, 20 parking is expensive, providing additional 21 parking is expensive. And it is a shame. I do 22 not like the cost of housing, but having worked 23 in affordable housing for a lot of years, it's an 24 ongoing problem. And I don't like it, and I 25 don't blame anybody else for not liking it, but</p> <p style="text-align: right;">Page 149</p>




<p>1 just saying no isn't going to fix it.  2 And in fact, I am grateful to the State  3 for 80-11-97 and for the CEQA exemption because  4 it's doing exactly what it was intended to do,  5 which is to allow this project to go forward  6 without the costly process, you know, of doing a  7 full EIR. So I just have to say I support the  8 project. I -- and I actually -- I would  9 encourage folks to look at the precedent images  10 in the design package that we got from the  11 architect.  12 Because if you look at the present  13 images, I really do -- I physically saw, oh,  14 yeah, I see how they're referring to the  15 neighborhood and the character of the  16 neighborhood and the buildings and the awnings  17 and the materials. It's funky, yeah, but Venice  18 is funky.  19 And while I didn't grow up there, I  20 grew up in Culver City, I took the bus to Venice  21 all the time every summer when I was a kid  22 because I thought it was the coolest place to  23 hang out because of the whimsy and the funkiness.  24 And I think this project, from what I see given  25 -- I don't live there now, but from what I see,</p> <p style="text-align: right;">Page 150</p>	<p>1 program, but no funds have ever been exchanged  2 between our two organizations, and we don't have  3 any formal partnerships, and we have no stake in  4 this project.  5 And so I want to quickly just share  6 what I feel, and I want to say that embarking on  7 a project like this with a complexity of partners  8 on city-owned land is complicated. And I do --  9 I'm so glad that this is actually except from  10 (indiscernible), that there's a thoughtfulness in  11 what the use is. And a project like this would  12 not be possible on privately owned land. It  13 would take a lot of work to get to the financing  14 to make a project like this even possible.  15 And to have more than just permanent  16 supportive housing, but also housing of other  17 residents and artist housing and community  18 serving uses is incredible for a community like  19 Venice where it -- where that is otherwise not  20 accessible.  21 I also believe that this project  22 doesn't take away access to the beach. Parking  23 will be replaced and expanded, and access to the  24 canal will also be enhanced. So I support this  25 project, and I hope we can take a vote before 3.</p> <p style="text-align: right;">Page 152</p>
<p>1 it carries it forward.  2 So again, I want to appreciate how  3 upsetting and emotional this is to folks, and I'm  4 sorry. I really hope what you get to see several  5 years down the road when this is open is that you  6 get to use the wonderful spaces, the arts uses,  7 whatever coffee shops it brings, and celebrate  8 this new housing for your neighbors, and  9 celebrate that the City is trying to look at a  10 multitude of solutions for housing, whether it's,  11 you know, the tiny homes, the temporary shelters,  12 and this permanent supportive housing. So if I  13 can vote, if we get to it in 13 minutes, which I  14 doubt, I would give it my full support.  15 PRESIDENT SAMANTHA MILLMAN: Thank you,  16 Jenna. Helen?  17 COUNCILMEMBER HELEN LEUNG: I echo  18 everything Commissioner Hornstock said. You said  19 it so beautifully. Before I share my comments, I  20 want to just clarify on the record that neither I  21 or the non-profit where I work, LA-Mas. has any  22 conflicts of interest with this project. LA-Mas  23 has collaborated in the past with Venice  24 Community Housing over two years ago in just  25 doing resident outreach for an affordable housing</p> <p style="text-align: right;">Page 151</p>	<p>1 PRESIDENT SAMANTHA MILLMAN: Thank you.  2 Yvette?  3 COUNCILMEMBER YVETTE LOPEZ-LEDESMA:  4 Thank you, Samantha. Yeah, I would be prepared  5 to make a motion to adopt staff recommendations.  6 I think it's a great project. I'm familiar with  7 the area. I'm familiar with the work of Becky  8 Dennison, and I'm familiar with the community.  9 And I just think that we need this. We need  10 projects like this one, and so full support  11 behind it.  12 PRESIDENT SAMANTHA MILLMAN: Thank you.  13 Karen?  14 COUNCILMEMBER KAREN MACK: I feel like  15 this is part two of the Mello ordinance  16 conversation with a case study and why it's so  17 difficult to build affordable housing on the  18 coast. And I really am thrilled. I mean, I feel  19 like, you know, as I want to say, you know, we're  20 not just building buildings. We're building  21 community, and that's what this is I think  22 supporting, building a community that's just not  23 homeless folks, but you know, bringing some  24 diversity back into Venice, which is, you know,  25 the ideal.</p> <p style="text-align: right;">Page 153</p>

<p>1 And so I am in full support. And I  2 just want to take my hats off to Venice Community  3 Housing because every time, you know, I heard  4 Becky Dennison speak she's getting beat up, you  5 know, because people don't want to lose their  6 parking. And you know, it's just ridiculous.  7 This is a great project. It's very, very  8 difficult.  9 If it was easy to build this kind of  10 housing, we wouldn't be in this crisis. So this  11 is really, you know, a yeoman's job to create a  12 project that actually is going to have a positive  13 impact on the community. So it has my full  14 support.  15 PRESIDENT SAMANTHA MILLMAN: Thank you.  16 Dana?  17 COUNCILMEMBER DANA PERLMAN: I'm not  18 sure what I can add to my fellow commissioners.  19 I want to thank all the stakeholders and people  20 for submitting their written comments and coming  21 and speaking today. We do hear you, and we  22 understand these are difficult issues in that  23 Venice is a unique community.  24 It's a sort community. It is a  25 geographically restricted community. All of</p> <p style="text-align: right;">Page 154</p>	<p>1 have a full EIR from the Neighborhood Council  2 would say that, I'm sorry. Really.  3 It isn't -- that's the exact reason why  4 this legislature was put in place is so that it  5 will not cost millions of additional dollars and  6 take years more time for these vital projects to  7 get built. They need to be built now. We need  8 the housing today.  9 This is a -- this belongs as a  10 categorically exempt project, and we have no  11 evidence, zero, of any reasonable possibility  12 that there would be any significant impact on the  13 environment here. It's all just conjecture  14 people throw out. Well, we're losing open  15 surface parking lot. I find that very sad to  16 prioritize surface parking lots over housing for  17 our fellow man. I think that's really sad.  18 I hope we can have a vote by 3:00. I  19 won't talk any longer, and I think this is a  20 terrific project. Thank you.  21 PRESIDENT SAMANTHA MILLMAN: Thank you.  22 Renee?  23 COUNCILMEMBER RENEE DAKE WILSON: Hi.  24 This is Renee Dake Wilson, and I just want to say  25 I echo what was so well-said by my other</p> <p style="text-align: right;">Page 156</p>
<p>1 those make it very complicated, but it's also an  2 area that is, as you know, housing-starved and is  3 overwhelmed with people who are -- would only use  4 -- I think someone said when they took the term  5 "homeless" away, that's because we don't want to  6 use the term "homeless". These are people who  7 are housing-deprived.  8 In fact, I know there are better terms,  9 and Helen could probably help me with that, but  10 these are people who want to have a roof over  11 their head. Many of them. Not all of them. Not  12 everyone, but we need to give them that  13 opportunity. And it's not simply, as we've said  14 so many times, just building a roof. It's  15 providing the resources and the support and the  16 training and access to giving them a leg up and  17 an opportunity that they'll be able to become  18 more engaged if they want that.  19 And I think that's our obligation to  20 our fellow man. I think this is a terrific  21 project. It's -- as Jenna said, it's not taking  22 away parking. As Karen said -- I think it was  23 Karen -- it's not taking away access to the  24 canal. It's checking so many boxes. It's really  25 terrific. And for people to say that this should</p> <p style="text-align: right;">Page 155</p>	<p>1 commissioners. And I want to just let everyone  2 know who has stuck with us for so long that we  3 have heard you. This is a quick conclusion to  4 this conversation I think because we feel that  5 there is such an overriding need for affordable  6 and permanent supportive housing.  7 And this is -- the project is making  8 that move forward while solving and compromising  9 to make those needs, it's working really hard to  10 do that, and we recognize it. You have been  11 heard. I heard so much upset and anger from  12 people opposed to the project, and I don't think  13 that's going away or focused on just this  14 project. I think that we have an intractable  15 problem with housing right now, and I think we're  16 making a difference with this project, and I'm in  17 full support of it.  18 And architecturally, I wanted to say,  19 yeah, (indiscernible) work is not for everybody,  20 but he is an internationally reputable architect.  21 Go to the City of Culver City. Go to any  22 architecture school. You will find amazing work  23 of his that is all sculptural and have great  24 design ambition similar to this one.  25 It is being called a barge. Well, it's</p> <p style="text-align: right;">Page 157</p>



<p>1 at the ocean. It's at a canal. That might be a</p> <p>2 little bit on purpose. And the way it responds</p> <p>3 to the surrounding neighborhood is pretty great</p> <p>4 to allow that access to the canal and maintain</p> <p>5 the public front of this project is really</p> <p>6 wonderful with -- between the housing. So thank</p> <p>7 you.</p> <p>8 PRESIDENT SAMANTHA MILLMAN: Thank you.</p> <p>9 Caroline?</p> <p>10 VICE PRESIDENT CAROLINE CHOE: Thank</p> <p>11 you. I too want to get a vote before 3, so I'll</p> <p>12 keep it short, but I want to say I'm in agreement</p> <p>13 with many of the comments that my fellow</p> <p>14 commissioners have made. I just wanted to add</p> <p>15 that someone mentioned, you know, why would we</p> <p>16 choose this? It's only 100, you know, four</p> <p>17 units, but over the span of 55 years, it's many,</p> <p>18 many lives that will be affected.</p> <p>19 And you know, sometimes it's hard for</p> <p>20 us to accept the change, but I really believe</p> <p>21 that this project is needed in our city. And you</p> <p>22 know, it's not only for the homeless, but it's</p> <p>23 for people who may be a paycheck away from being</p> <p>24 able to live in an apartment.</p> <p>25 And you know, I think that it's time</p> <p style="text-align: right;">Page 158</p>	<p>1 move staff's recommended action.</p> <p>2 COUNCILMEMBER DANA PERLMAN: I'll</p> <p>3 second that.</p> <p>4 PRESIDENT SAMANTHA MILLMAN: With Dana</p> <p>5 Perlman for the second. Irene, will you please</p> <p>6 call for the vote?</p> <p>7 IRENE GONZALEZ: Yes. Irene</p> <p>8 (indiscernible) for the record. Commissioner</p> <p>9 Millman?</p> <p>10 PRESIDENT SAMANTHA MILLMAN: Wait.</p> <p>11 Hold on one second. Jenna, did you --</p> <p>12 COUNCILMEMBER JENNA HORNSTOCK: I think</p> <p>13 there are technical modifications. Weren't there</p> <p>14 technical modifications on this one or am I</p> <p>15 looking at the wrong one?</p> <p>16 PRESIDENT SAMANTHA MILLMAN: Item --</p> <p>17 COUNCILMEMBER DANA PERLMAN: We're on</p> <p>18 number 9.</p> <p>19 COUNCILMEMBER JENNA HORNSTOCK: No,</p> <p>20 sorry. That was 8. Sorry. I apologize.</p> <p>21 PRESIDENT SAMANTHA MILLMAN: That's</p> <p>22 okay.</p> <p>23 COUNCILMEMBER JENNA HORNSTOCK:</p> <p>24 (Indiscernible).</p> <p>25 PRESIDENT SAMANTHA MILLMAN: No</p> <p style="text-align: right;">Page 160</p>
<p>1 for our city to make some, you know, big changes</p> <p>2 because we are, you know, Los Angeles and people</p> <p>3 look to us to lead, and I really hope that this</p> <p>4 will be a project that people look back on in</p> <p>5 terms of really making changes in the lives of</p> <p>6 many.</p> <p>7 PRESIDENT SAMANTHA MILLMAN: Thank you,</p> <p>8 Caroline. I think I'm the last. I'll try to go</p> <p>9 quickly. What everyone has said, and I love that</p> <p>10 this is a mixed-use project. I think the ground-</p> <p>11 floor retail works really well in some projects</p> <p>12 I've seen downtown. You would never know that</p> <p>13 these projects are permanent supportive housing</p> <p>14 or low-income housing because the retail is</p> <p>15 vibrant.</p> <p>16 As far as there were some attacks on</p> <p>17 the Housing First model, which is not a matter of</p> <p>18 land use, but I have to say as someone who my</p> <p>19 brother was an addict. And if you wait for</p> <p>20 someone to get sober before you put a roof over</p> <p>21 their head, they will die on the street. It's</p> <p>22 the just end of the story.</p> <p>23 So, everything I want to say has</p> <p>24 already been said. I'm going to go ahead and on</p> <p>25 item number 9, which is the appeal, I am going to</p> <p style="text-align: right;">Page 159</p>	<p>1 problem.</p> <p>2 COUNCILMEMBER JENNA HORNSTOCK: I've</p> <p>3 been trying to track those.</p> <p>4 PRESIDENT SAMANTHA MILLMAN: Irene,</p> <p>5 will you please call for the vote?</p> <p>6 IRENE GONZALEZ: Yes. Commissioner</p> <p>7 Millman?</p> <p>8 PRESIDENT SAMANTHA MILLMAN: Yes.</p> <p>9 IRENE GONZALEZ: Commissioner Perlman?</p> <p>10 COUNCILMEMBER DANA PERLMAN: Yes.</p> <p>11 IRENE GONZALEZ: Commissioner Dake</p> <p>12 Wilson?</p> <p>13 COUNCILMEMBER RENEE DAKE WILSON: Yes.</p> <p>14 IRENE GONZALEZ: Commissioner</p> <p>15 Hornstock?</p> <p>16 COUNCILMEMBER JENNA HORNSTOCK: Yes.</p> <p>17 IRENE GONZALEZ: Commissioner Leung?</p> <p>18 COUNCILMEMBER HELEN LEUNG: Yes.</p> <p>19 IRENE GONZALEZ: Commissioner Lopez-</p> <p>20 Ledesma?</p> <p>21 COUNCILMEMBER YVETTE LOPEZ-LEDESMA:</p> <p>22 Yes.</p> <p>23 IRENE GONZALEZ: Commissioner Mack?</p> <p>24 COUNCILMEMBER KAREN MACK: Yes.</p> <p>25 IRENE GONZALEZ: Commissioner Choe?</p> <p style="text-align: right;">Page 161</p>

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<p>1 VICE PRESIDENT CAROLINE CHOE: Yes.</p> <p>2 IRENE GONZALEZ: And the motion</p> <p>3 carries.</p> <p>4 PRESIDENT SAMANTHA MILLMAN: Thank you.</p> <p>5 And the same for item number 10, I'm going to go</p> <p>6 ahead and move staff's recommended actions.</p> <p>7 COUNCILMEMBER DANA PERLMAN: And I'll</p> <p>8 second that.</p> <p>9 PRESIDENT SAMANTHA MILLMAN: Irene, we</p> <p>10 have a first and a second. Will you please call</p> <p>11 for the vote?</p> <p>12 IRENE GONZALEZ: Commissioner Millman?</p> <p>13 PRESIDENT SAMANTHA MILLMAN: Yes.</p> <p>14 IRENE GONZALEZ: Commissioner Perlman?</p> <p>15 COUNCILMEMBER DANA PERLMAN: Yes.</p> <p>16 IRENE GONZALEZ: Commissioner Dake</p> <p>17 Wilson?</p> <p>18 COUNCILMEMBER RENEE DAKE WILSON: Yes.</p> <p>19 IRENE GONZALEZ: Commissioner</p> <p>20 Hornstock?</p> <p>21 COUNCILMEMBER JENNA HORNSTOCK: Yes.</p> <p>22 IRENE GONZALEZ: Commissioner Leung?</p> <p>23 COUNCILMEMBER HELEN LEUNG: Yes.</p> <p>24 IRENE GONZALEZ: Commissioner Lopez-</p> <p>25 Ledesma?</p> <p style="text-align: right;">Page 162</p>	<p>1 CERTIFICATION</p> <p>2</p> <p>3 I, Sonya Ledanski Hyde, certify that the</p> <p>4 foregoing transcript is a true and accurate</p> <p>5 record of the proceedings.</p> <p>6</p> <p>7 </p> <p>8</p> <p>9</p> <p>10</p> <p>11 Veritext Legal Solutions</p> <p>12 330 Old Country Road</p> <p>13 Suite 300</p> <p>14 Mineola, NY 11501</p> <p>15</p> <p>16 Date: September 9, 2021</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p style="text-align: right;">Page 164</p>
<p>1 COUNCILMEMBER YVETTE LOPEZ-LEDESMA:</p> <p>2 Yes.</p> <p>3 IRENE GONZALEZ: Commissioner Mack?</p> <p>4 COUNCILMEMBER KAREN MACK: Yes.</p> <p>5 IRENE GONZALEZ: Commissioner Choe?</p> <p>6 VICE PRESIDENT CAROLINE CHOE: Yes.</p> <p>7 IRENE GONZALEZ: And the motion</p> <p>8 carries.</p> <p>9 PRESIDENT SAMANTHA MILLMAN: Thank you.</p> <p>10 Before we sign off, I do want to thank members of</p> <p>11 the community for coming and testifying on this</p> <p>12 item. I know for half of those who testified on</p> <p>13 this item, it was not the outcome you wanted. I</p> <p>14 also understand that the situation on the ground</p> <p>15 in Venice is heartbreaking and devastating and</p> <p>16 difficult. And I think it's difficult for</p> <p>17 residents of Venice who are housed, and it is</p> <p>18 awful for residents of Venice who are unhoused.</p> <p>19 And I hear the frustration. It is not</p> <p>20 lost on me, and I suspect it is not lost on my</p> <p>21 colleagues, and just wanted to say that before</p> <p>22 signing off. With that, I'm going to adjourn</p> <p>23 this meeting at 3:00, and I will see you all at -</p> <p>24 - in June. Thank you for your time today.</p> <p>25 (Meeting adjourned.)</p> <p style="text-align: right;">Page 163</p>	

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[conflicts - culver]

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[pregnancy - program]

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[program - public]

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[works - zuberi]

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# **EXHIBIT B**



**Geotechnical • Geologic • Coastal • Environmental**

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October 20, 2021

WO 7986

Hollywood Community Housing Corporation  
5020 Santa Monica Blvd  
Los Angeles, CA 90029

Venice Community Housing  
200 Lincoln Blvd  
Los Angeles, CA 90291

ATTENTION: Sarah Letts and Becky Dennison

SUBJECT: FEMA Clarification/Discussion for Reese Davidson Community.

REFERENCE: "Sea Level Rise Hazard Discussion for Reese Davidson Community, 2102-2120 S. Pacific Avenue, 116-302 E. North Venice Blvd, 2106-2116 S. Canal Street, and 319 E. South Venice Blvd," by GeoSoils, Inc. Dated December 28, 2020.

Dear Ms. Letts and Ms. Dennison:

GeoSoils, Inc. (GSI) is pleased to provide this clarification regarding the FEMA flood insurance rate maps (FIRMs) considered for the above referenced coastal hazard study. The coastal hazard study was based upon the pending FEMA FIRMs at that time. The FIRMs became effective on 4/21/2021 without any changes relevant to the coastal hazard study. It should be noted that the lowest finished floor proposed is above the new FIRMs base flood elevation (BFE).

The opportunity to be of service is sincerely appreciated. If you should have any questions, please do not hesitate to contact me.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'David W. Skelly'.

**GeoSoils, Inc.**  
David W. Skelly MS, PE  
RCE#47857



# **EXHIBIT C**



# MEMORANDUM

TO: Ira Brown, City of Los Angeles  
FROM: Mark Hagmann, P.E.  
SUBJECT: Response to SWAPE Comments on Reese Davidson Community Project  
Concerning Construction and Operational Health Risk Assessment  
DATE: October 28, 2021

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## 1. Introduction

On October 19, 2020 SWAPE provided a comment letter at the request of Jamie Hall, Channel Law Group, LLP, counsel to Venice Vision, regarding the proposed Reese Davidson Community project (Project). As stated in the comment letter, SWAPE reviewed the City of Los Angeles' (City) Initial Study (IS) for the Project, along with the August 2020 Public Hearing Notice (PHN), to prepare the comment letter.

The Notice of Preparation for the Project was issued on December 18, 2018. The Project subsequently became exempt from CEQA under Assembly Bill (AB) 1197, which was signed into law on September 26, 2019, and exempts from CEQA's requirements certain activities and actions that are approved or carried out by the City related to the provision of supportive housing, including the Project. Since the Project is a permanent supportive housing project consistent with AB 1197's eligibility requirements, it is exempt from CEQA.

Nevertheless, for informational purposes, this memorandum provides responses to health risk comments beginning on Page 6 of the comment letter and Exhibit A (SWAPE's evaluation of the IS). As detailed in this memorandum and Attachment A:

- The Project is not considered to be a substantial source of diesel particulate matter warranting a refined HRA since daily truck trips to the Project Site would not exceed 100 trucks per day or more than 40 trucks with operating transport refrigeration units;



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- SWAPE's health risk results are misleading, highly inaccurate and lack credibility. The Project would not result in a significant health risk impact during combined construction and operation;
- SWAPE significantly overestimated potential diesel exhaust emissions from construction and operation of the proposed Project. SWAPE also misrepresents the pollutant emissions;
- The SWAPE analysis use of AERSCREEN provides a much less accurate assessment of Project health risks compared to the refined AERMOD evaluation prepared in response to these comments;
- SWAPE significantly overestimates actual Project emissions;
- SWAPE misconstrues guidance from SCAQMD, wrongly claiming that it recommends use of Age Sensitivity Factors for construction HRAs;
- For carcinogenic exposures (construction and operational), the increase in risk is calculated to be 5.5 in one million, which is less than the applicable threshold of 10 in one million for sensitive receptors immediately north of the Project Site, resulting in a less than significant impact.
- For chronic non-carcinogenic exposures (construction and operational), the increase in the respiratory hazard index was estimated to be less than the applicable threshold of one for sensitive receptors in close proximity to the Project Site, resulting in a less than significant impact.

For all of these reasons, and as discussed more fully below, SWAPE's health risk results are misleading and highly inaccurate and are not supported by credible evidence, much less substantial evidence.





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### 2. Responses to Exhibit A (SWAPE Comment Letter on Health Risk)

The health risk comments beginning on Page 6 of the comment letter and Exhibit A (SWAPE's evaluation of the IS) are numbered below and included verbatim followed by numbered responses to each of the written comments.

#### Comment No. SWAPE-1

##### **Diesel Particulate Matter Health Risk Emissions Inadequately Evaluated**

As discussed above, the PHN [Public Hearing Notice] claims that the proposed Project is exempt from CEQA environmental review pursuant to AB 1197. As a result, the PHN fails to evaluate the proposed Project's potential health risk impacts. However, this is incorrect for two (2) reasons.

First, by failing to prepare a construction and operational HRA for existing sensitive receptors, the Project is inconsistent with recommendations set forth by the Office of Environmental Health Hazard Assessment ("OEHHA"), the organization responsible for providing recommendations for health risk assessments in California. In February of 2015, OEHHA released its most recent *Risk Assessment Guidelines: Guidance Manual for Preparation of Health Risk Assessments*, which was formally adopted in March of 2015.<sup>3</sup> This guidance document describes the types of projects that warrant the preparation of an HRA. Construction of the Project will produce emissions of diesel particulate matter ("DPM"), a human carcinogen, through the exhaust stacks of construction equipment. The OEHHA document recommends that all short-term projects lasting at least two months be evaluated for cancer risks to nearby sensitive receptors.<sup>4</sup> As the IS indicates that Project construction will begin in 2020 and end in 2023, the Project should be evaluated for cancer risks pursuant to OEHHA guidance (p. A-18). Furthermore, once construction of the Project is complete, the Project will operate for a long period of time. During operation, the Project will generate vehicle and truck trips, which will produce additional exhaust emissions, thus continuing to expose nearby sensitive receptors to emissions. The OEHHA document recommends that exposure from projects lasting more than six months should be evaluated for the duration of the project, and recommends that an exposure duration of 30 years be used to estimate individual cancer risk for the maximally exposed



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individual resident ("MEIR").<sup>5</sup> Even though the Project documents fail to provide the expected lifetime of the Project, we can reasonably assume that the Project will operate for at least 30 years, if not more. Therefore, we recommend that health risk impacts from Project operation also be evaluated, as a 30-year exposure duration exceeds the 2-month and 6-month requirements set forth by OEHHA. Therefore, per OEHHA guidelines, we recommend that health risk impacts from Project construction and operation be evaluated in an environmental analysis for the proposed Project.

Second, the Project fails to compare the excess health risk to the SCAQMD's specific numeric threshold of 10 in one million.<sup>6</sup> Thus, it cannot be assumed that the Project would not be likely to cause substantial environmental damage without quantifying the Project's construction and operational cancer risk to compare to the proper threshold, as recommended by the lead agency for the Project.

<sup>3</sup> OEHHA (February 2015) *Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments*, <http://bit.ly/2sAKySW>.

<sup>4</sup> OEHHA (February 2015) *Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments*, <http://bit.ly/2sAKySW>, p. 8-18.

<sup>5</sup> OEHHA (February 2015) *Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments*, <http://bit.ly/2sAKySW>, p. 8-6, 8-15

<sup>6</sup> "South Coast AQMD Air Quality Significance Thresholds." SCAQMD, April 2019, available at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2>.

### **Response to Comment No. SWAPE-1**

The comment identifies that the OEHHA adopted a new version of the Air Toxics Hot Spots Program Guidance Manual for the Preparation of Risk Assessments (new Guidance Manual) in March of 2015, and states that the Project is inconsistent with this guidance.<sup>1</sup> The new Guidance Manual was developed by OEHHA, in conjunction with CARB, for use in implementing the Air Toxics "Hot Spots" Program (Health and Safety Code Section 44360 et seq.). The Air Toxics "Hot Spots" Program requires stationary sources to report

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<sup>1</sup> See OEHHA, *Notice of Adoption of Air Toxics Hot Spots Program Guidance Manual for the Preparation of Health Risk Assessments 2015*, [www.oehha.ca.gov/air/hot\\_spots/hotspots2015.html](http://www.oehha.ca.gov/air/hot_spots/hotspots2015.html).



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the types and quantities of certain substances routinely released into the air. The goals of the Air Toxics "Hot Spots" Act are to collect emission data, identify facilities having localized impacts, ascertain health risks, notify nearby residents of significant risks, and reduce those significant risks to acceptable levels. The new Guidance Manual was not developed to assess short-term projects, including construction of projects.

The new Guidance Manual provides recommendations related to cancer risk evaluation of certain short-term projects. As discussed in Section 8.2.10 of the Guidance Manual, "The local air pollution control districts sometimes use the risk assessment guidelines for the Hot Spots program in permitting decisions for short-term projects such as construction or waste site remediation." Short-term projects that would require a permitting decision by SCAQMD typically would be limited to site remediation (e.g., stationary soil vapor extractors) and would not be applicable to the Project. This comment misrepresents OEHHA's guidance in Section 8.2.10 (page 8-18) that "the OEHHA document recommends that all short-term projects lasting at least two months be evaluated for cancer risks to nearby sensitive receptors." The new Guidance Manual does not provide specific recommendations for evaluation of short-term use of mobile sources (e.g., heavy-duty diesel construction equipment).

A construction HRA is not required by SCAQMD or the L.A. City CEQA Thresholds Guide, and no guidance for health risk assessments for construction has been adopted by SCAQMD or the City. The SCAQMD has stated that "SCAQMD currently does not have guidance on construction Health Risk Assessments."<sup>2</sup> In addition, SCAQMD has clarified that the Office of Environmental Health Hazard Assessment (OEHHA) Guidance Manual are not CEQA significance thresholds applicable to construction or to non-stationary source projects such as the Project, and SCAQMD staff is still evaluating how to implement the Guidance Manual under CEQA for construction and non-stationary source projects. To

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<sup>2</sup> *South Coast Air Quality Management District, Final Environmental Assessment for: Proposed Amended Rule 307.1 – Alternative Fees for Air Toxics Emissions Inventory; Proposed Amended Rule 1401 – New Source Review of Toxic Air Contaminants; Proposed Amended Rule 1402 – Control of Toxic Air Contaminants from Existing Sources; SCAQMD Public Notification Procedures for Facilities Under the Air Toxics "Hot Spots" Information and Assessment Act (AB 2588) and Rule 1402; and, SCAQMD Guidelines for Participating in the Rule 1402 Voluntary Risk, page 2-23, September 2016. The SCAQMD only applies the revised OEHHA Guidelines for operational impacts at stationary industrial source facilities that are in the AB 2588 Air Toxics Hot Spots program, which does not apply to the proposed Project.*



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date, SCAQMD has not conducted public workshops nor developed policy relating to the applicability of applying the revised 2015 OEHHA Guidance Manual for projects prepared by other public/lead agencies subject to CEQA or for residential and commercial projects, such as the proposed Project.

Regarding potential health risk impacts related to construction activities, proposed construction activities would be limited in duration and considered a short-term source of TAC emissions. The SCAQMD CEQA Air Quality Handbook does not recommend analysis of TACs from short-term construction activities associated with land use development projects. The rationale for not requiring a health risk assessment for construction activities is the limited duration of exposure. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of individual cancer risk. Specifically, "Individual Cancer Risk" is the likelihood that a person continuously exposed to concentrations of toxic air contaminants (TACs) over a 70-year lifetime will contract cancer based on the use of standard risk assessment methodology.<sup>3</sup> Because the construction schedule for the Project estimates the overall construction schedule would be limited to approximately 36 months, construction of the Project would not result in a substantial, long-term (i.e., 70-year) source of TAC emissions. No residual emissions and corresponding individual cancer risk are anticipated after construction. Because there is such a short-term exposure period (36 out of 840 months of a 70-year lifetime), further evaluation of construction TAC emissions is not warranted. This supporting information is consistent with *L.A. City CEQA Thresholds Guide* in making a case-by-case basis determination of significance. As such, Project-related TAC emission impacts during construction would not result in a potentially significant health risk impact.

From an operational standpoint, the Project would not support any land uses or activities that would involve the use, storage, or processing of carcinogenic toxic air contaminants. In addition, the proposed land uses would generally involve limited use of heavy-duty diesel trucks (e.g., delivery trucks). The commenter is referred to the SCAQMD guidance below that provides clarification as to when an HRA may be warranted:

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<sup>3</sup> *South Coast Air Quality Management District (SCAQMD) CEQA Handbook, 1993. Chapters 5, 9 and 10.*

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*The SCAQMD published and adopted the Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning, 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).<sup>4</sup> The SCAQMD recommends that HRAs be conducted for substantial sources of DPM (e.g., truck stops and warehouse distribution facilities that generate more than 100 trucks per day or more than 40 trucks with operating transport refrigeration units).*

The Project includes the development of approximately 140 residential units. The Project also includes approximately 685 square feet of onsite supportive service office uses, approximately 2,255 square feet of retail uses, approximately 810 square feet of (indoor) restaurant uses<sup>5</sup>, approximately 500 square feet of outdoor restaurant service area, and approximately 2,875 square feet of art studio use. Upon completion, 103,957 square feet of floor area would be located within the Project Site and include 357 automobile parking spaces, as well as 136 bicycle parking spaces (117 long term and 19 short term).

A conservative estimate of the number of daily truck trips is provided below based on the National Cooperative Highway Research Program Truck Trip Generation Data.<sup>6</sup>

- Table D-2e of the NCHRP data (Trip Generation Summary—Daily Commercial Vehicle Trips per 1,000 sf of Building Space for Other Land Uses (includes housing)) provides an average of 0.011 truck trips per 1,000 sf or approximately one delivery truck per day for the Project's 65,095 square feet (140 dwelling units or 64,410 square feet and residential supportive services) of residential uses. It

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<sup>4</sup> SCAQMD, *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*, May 6, 2005.

<sup>5</sup> Pursuant to the Venice Coastal Zone Specific Plan Parking Requirement Table (Section 13D), the parking required for a restaurant use is based on the area of the Service Floor (i.e., does not include the kitchen or other similar "back of house" areas). The Service Floor area of the Project is 560 square feet.

<sup>6</sup> National Cooperative Highway Research Program (NCHRP) Synthesis 298 Truck Trip Generation Data, 2001, [http://onlinepubs.trb.org/onlinepubs/nchrp/nchrp\\_syn\\_298.pdf](http://onlinepubs.trb.org/onlinepubs/nchrp/nchrp_syn_298.pdf).



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is conservatively assumed that all delivery trucks would be heavy-duty diesel trucks even though many residential truck deliveries are from smaller gasoline trucks (e.g., UPS or FedEx).

- Table D-2c of the NCHRP data (Trip Generation Summary—Daily Commercial Vehicle Trips per 1,000 sf of Building Space for Retail (includes restaurants) provides an average of 0.324 truck trips per 1,000 sf. The Project's 3,035 square feet of retail/restaurant square feet of development would generate approximately one delivery per day. Once again, this assumes that all trucks would be diesel even though many retail truck deliveries are from smaller gasoline trucks (e.g., UPS or FedEx). It was assumed that the truck would be equipped with a transportation refrigeration unit (TRUs) related to restaurant use.
- Table D-3d of the NCHRP data (Trip Generation Summary—Daily Commercial Vehicle Trips per 1,000 sf of Building Space for Cultural, Recreation, Entertainment provides an average of 0.21 truck trips per 1,000 sf. The Project's 2,875 square feet of art studio use would generate one delivery per day. Once again, this assumes that all trucks would be diesel even though many truck deliveries are from smaller gasoline trucks (e.g., UPS or FedEx).

As shown above, the Project is estimated to generate approximately three truck deliveries per day during operation. Based on SCAQMD guidance, no quantitative analysis is required for future cancer risk within the vicinity of the Project as the Project is consistent with the recommendations regarding the siting of new sensitive land uses near potential sources of TAC emissions provided in the SCAQMD *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*. Specifically, the Project is not considered to be a substantial source of diesel particulate matter warranting a refined HRA since daily truck trips to the Project Site would not exceed 100 trucks per day or more than 40 trucks with operating transport refrigeration units.

As discussed previously, the Project became exempt from CEQA under Assembly Bill ("AB") 1197, which was signed into law on September 26, 2019. Under AB 1197, permanent supportive housing projects do not require CEQA review. Since the Project is a permanent supportive housing project consistent with AB 1197's eligibility requirements, it is exempt from CEQA and an EIR was not required. Nonetheless, for informational purposes, an HRA has been prepared in response to this comment to confirm that the





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construction and operation of the Project would not result in any significant health risk impact associated with air quality. The HRA is included as Appendix A to this memorandum. The HRA demonstrates that health risks from the Project would be a maximum of 5.5 in one million for residences located north of the Project Site, which is below the applicable significance threshold of 10 in one million.

### Comment No. SWAPE-2

#### **Screening-Level Assessment Indicates Significant Health Risk Impacts**

In an effort to demonstrate the potential health risk posed by Project construction and operation to nearby, existing sensitive receptors utilizing a site-specific emissions estimates, we prepared a simple screening-level HRA based on SWAPE's CalEEMod model. The results of our assessment as described below, demonstrate that the proposed Project may result in a significant impact not previously identified or addressed.

In order to conduct our screening-level risk assessment we relied upon AERSCREEN, which is a screening level air quality dispersion model.<sup>7</sup> The model replaced SCREEN3, and AERSCREEN is included in the OEHHA<sup>8</sup> and the California Air Pollution Control Officers Associated ("CAPCOA")<sup>9</sup> guidance as the appropriate air dispersion model for Level 2 health risk screening assessments ("HRSAs"). 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.

<sup>7</sup> U.S. EPA (April 2011) AERSCREEN Released as the EPA Recommended Screening Model, [http://www.epa.gov/ttn/scram/guidance/clarification/20110411\\_AERSCREEN\\_Release\\_Memo.pdf](http://www.epa.gov/ttn/scram/guidance/clarification/20110411_AERSCREEN_Release_Memo.pdf)

<sup>8</sup> "Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments." OEHHA, February 2015, available at: [http://oehha.ca.gov/air/hot\\_spots/2015/2015GuidanceManual.pdf](http://oehha.ca.gov/air/hot_spots/2015/2015GuidanceManual.pdf)

<sup>9</sup> CAPCOA (July 2009) Health Risk Assessments for Proposed Land Use Projects, [http://www.capcoa.org/wp-content/uploads/2012/03/CAPCOA\\_HRA\\_LU\\_Guidelines\\_8-6-09.pdf](http://www.capcoa.org/wp-content/uploads/2012/03/CAPCOA_HRA_LU_Guidelines_8-6-09.pdf).



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### Response to Comment No. SWAPE-2

This comment summarizes the findings of a screening level-HRA prepared by SWAPE. Specific comments regarding this screening level analysis are provided below. The SWAPE analysis and related technical appendices were carefully reviewed for purposes of considering the potential of the Project to result in health risk impacts. Based on this evaluation, multiple methodological flaws were identified that substantially undermine the accuracy of the SWAPE results as compared with the more refined, site-specific HRA prepared in response to these comments. The most important of these issues are detailed here and then discussed as needed in other specific responses to comments.

SWAPE's simple screening-level HRA relied upon AERSCREEN, which is a screening-level air quality dispersion model. This screening-level HRA indicates a screening risk of 130 in one million ( $1.3\text{E-}04$ ) without age sensitivity factors and 380 in one million ( $3.8\text{E-}04$ ) with age sensitivity factors during construction. (Swape Letter, Page 9). These risk values are immediately suspect as misleading and unreasonable because they are substantially higher than typical risk values for industrial source projects, and are therefore an entirely unexpected result for a mixed-use residential project, which typically has significantly lower DPM emissions than an industrial source project.

For example, an HRA was conducted for the Phillips 66 Wilmington refinery facility in the City of Wilmington, California, which generates TAC emissions from oil refinery operations and associated industrial processes, and determined a 30-year residential risk at nearby residential receptors located adjacent to the east of the facility of 33.8 in one million ( $3.38\text{E-}05$ ).<sup>7</sup> The Phillips 66 Wilmington facility analysis included age sensitivity factors.

Unlike the Phillips 66 Wilmington facility, which generates long-term ongoing emissions from its continuous industrial operations, construction of the Project would not

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<sup>7</sup> SCAQMD, *Approval of AB 2588 Health Risk Assessment (HRA) for Phillips 66 Wilmington (South Coast AQMD Facility ID No. 171107)*, August 21, 2020, <http://www.aqmd.gov/docs/default-source/planning/risk-assessment/phillips-66-wilmington-171107---hra-approval-letter-8-21-20.pdf?sfvrsn=6>, accessed August 1, 2021.



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generate DPM emissions on an ongoing and continuous basis over a lifetime (70 years) or a residential exposure duration (30 years). Operation of the Project would generate a relatively small amount of ongoing operational DPM emissions from the approximately three diesel-fueled vehicles (e.g., delivery trucks) anticipated at the Project Site per day, as compared to an industrial oil refinery facility that has numerous heavy-duty, industrial-sized equipment and involves industrial processes. Thus, the unexpected high results reported in SWAPE's screening-level HRA do not appear, on their face, to be credible and mislead the public and decision-makers as to the human health risks associated with the Project's DPM emissions.

A key error with the SWAPE analysis is that it relied solely on a "screening level" model to evaluate health risks. A screening level analysis can be appropriate to assess whether more detailed, refined modeling assessment is needed. However, screening models rely on rough, very conservative assumptions to check if a project *could* cause a significant health impact. If, based on the screening, there is no potential for a significant impact, then no additional analysis is required. In this way, screening models can help save time and money by eliminating the need for some projects to complete more expensive, time-consuming dispersion modeling.

This use of screening models alone is not consistent with industry standard or agency guidance. As recommended by OEHHA, page 4-25 of *The Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments* states "Screening models are normally used when no representative meteorological data are available and may be used as a preliminary estimate to determine if a more detailed assessment is warranted."<sup>8</sup>

As noted above, screening level results that show a potential significant impact is only relevant to the extent it demonstrates that SWAPE should have then conducted additional analysis using a refined model, which is provided in the HRA prepared in response to these comments. As discussed therein, health risks were analyzed consistent with SCAQMD methodology and used AERMOD to complete refined dispersion modeling.

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<sup>8</sup> California Environmental Protection Agency. Air Toxics Hot Spots Program Risk Assessment Guidelines, The Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments.



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AERMOD accounts for a variety of refined, site-specific conditions that facilitate a more accurate assessment of Project impacts compared to the less refined AERSCREEN screening model used in the SWAPE analysis. The most important differences between AERSCREEN and AERMOD are the following:

- Meteorological Data—The AERSCREEN model assumes calm wind conditions at all times and a stable atmosphere (i.e., no atmospheric mixing) and does not have the capability to incorporate locally measured wind speed and wind direction data. Thus, AERSCREEN does not account for the dispersion of pollutants that occurs from wind. This is a significant limitation because wind directed away from sensitive receptor locations relative to a source of emissions would disperse pollutants away from sensitive receptors and thereby reduce the impact of TAC emissions on those receptors. Because the AERSCREEN model fails to account for local wind speed and wind direction, its application results in artificially elevated pollutant concentrations at sensitive receptors and, therefore, artificially elevated health risk levels. The HRA prepared in response to these comments instead used AERMOD which allows for SCAQMD representative meteorological data (West Los Angeles) to be used in calculation of annual concentrations. This SCAQMD meteorological data provides hourly conditions (e.g., wind speed, wind direction, and stability class) over a five-year period (43,800 hours). With these conditions, the AERMOD model is more representative of likely Project impacts compared to the AERSCREEN model.
- Site-Specific Conditions—AERMOD allows for analysis of multiple volume sources which is required to adequately represent Project construction and operation. The use of a single rectangular source with a release height of 3 meters to represent construction and operational activities provided in the SWAPE analysis does not adequately represent the Project site, does not account for complex terrain conditions, and likely overstates emissions because of the plume interaction with terrain. In addition, a volume source and not an area source is the type of source recommended by the SCAQMD for modeling construction equipment and diesel truck exhaust emissions (SCAQMD LST Guidelines). In addition, the SCAQMD LST Guidelines recommend a 5-meter release height instead of 3 meters, which would also overestimate potential concentrations. By accounting for site-specific conditions around the Project Site, the AERMOD model is more representative of likely Project impacts compared to the AERSCREEN model.



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- Source-to-Receptor Distance—The SWAPE analysis reported that the maximum impacts occurred 100 meters downwind. This is highly unusually for a screening model to provide a higher concentration further downwind for an area source as the pollutant travels further away from the source the plume becomes wider and pollutant concentrations decrease. An exception to this general rule is for a stack/chimney point source where the source is released high enough and with enough velocity/buoyancy that the ground concentrations closer to the source can result in lower pollutant concentrations. As a result, any findings from the SWAPE analyses based on modeling that shows higher concentrations from an area source further downwind are likely incorrect.

In sum, the AERSCREEN evaluation used by SWAPE provides a much less accurate assessment of Project health risks compared to the refined AERMOD evaluation. Moreover, as discussed in the specific comments below, the SWAPE screening level analysis was not performed in accordance with requirements included in SCAQMD's LST methodology and OEHHA's guidance because it did not account for the following: (1) site-specific conditions; (2) use of a refined dispersion model; (3) use of SCAQMD mandated meteorological data from the closest/most representative meteorological monitoring site within the Project area; and (4) higher pollutant concentrations at more distant receptors for an area source. If the SWAPE analysis accounted for the guidance and data discussed above, then the emissions would have been substantially less than shown in this comment.

In addition, the screening-level HRA has several significant flaws that account for the misleading and incorrect analysis and explain the unrealistically high results. The first flaw is that SWAPE assumes Project construction would occur at full intensity for seven days per week, including Sundays and holidays over the entire length of construction. This is not a valid assumption. LAMC Section 41.40 prohibits construction between the hours of 9:00 P.M. to 7:00 A.M., Monday through Friday, between 6:00 P.M. and 8:00 A.M., on Saturday, and no construction on Sunday. The Project would be required to comply with LAMC Section 41.40. SWAPE's incorrect assumptions contribute to substantially overestimated construction emissions and overestimated health risks at sensitive receptors.

The second flaw is that SWAPE used default CalEEMod assumptions for a generic 2.7 acre development (flaws discussed further below in Response to Comment No. 3) and uses total regional construction emissions to represent on-site construction activity





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(SWAPE Letter, p. 7), which means that SWAPE incorrectly assumed that all of the DPM emissions from mobile sources (e.g., delivery and haul truck trips) would all occur at the Project Site. This was also improper because mobile sources, by their very nature, do not generate emissions at a single location but rather along the entire vehicle trip, which would disperse the emissions along regional roadways and not concentrate the emissions at a single location. When conducting HRAs, dispersion of pollutants is a critical consideration because health risk impacts are a direct result of TAC concentrations. The screening operational HRA also incorrectly assumed that all mobile source emissions would occur at a single location, which results in concentrations at nearby sensitive receptors that are artificially elevated to highly unreasonable levels.

The third flaw is that SWAPE assumed the Project's "operational activities will generate 329.6 pounds of DPM per year throughout operation (SWAPE Letter, p. 8). This value was calculated based on the total exhaust PM<sub>10</sub> emissions, which includes all area, energy, and mobile source exhaust PM<sub>10</sub> emissions in the CalEEMod operational output file provided in Attachment 2 of the SWAPE letter. However, SWAPE incorrectly assumed the 329.6 pounds of exhaust PM<sub>10</sub> emissions were the result of diesel fuel combustion. In fact, only a small portion of these operational emissions are DPM. In reality, most of the area and energy exhaust PM<sub>10</sub> emissions are the result of gasoline-fueled landscaping equipment and natural gas combustion for building, heating, and cooking. Similarly, the operational mobile source exhaust PM<sub>10</sub> emissions are from a combination of primarily gasoline-fueled vehicles, such as passenger vehicles and light-duty pick-up trucks, and a smaller number of diesel-fueled trucks, as provided in the vehicle fleet percentages in the CARB on-road vehicle emissions factor (EMFAC) model. It is highly inappropriate and factually incorrect to analyze non-diesel fuel exhaust PM<sub>10</sub> emissions as DPM.

For all of these reasons, SWAPE's health risk results are misleading, highly inaccurate and lack credibility. In other words, SWAPE's conclusions are not supported by any credible evidence, much less substantial evidence. Even SWAPE acknowledged the serious limitations in its screening-level study, stating that "[o]ur analysis represents a screening-level HRA, which is known to be conservative and tends to err on the side of health protection."

Accordingly, potential health risk impacts from the Project to nearby sensitive uses (e.g., nearby residences) as the result of proposed construction and operational activities





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are more accurately identified by the AERMOD evaluation included in the HRA prepared in response to these comments. As shown in the HRA, pollutant concentrations are highest near the Project site and dissipate with distance. The Project would not result in a significant health risk impact during combined construction and operation. The HRA prepared in response to these comments demonstrates that health risks from the Project would be a maximum of 5.5 in one million for residences north of the Project Site, which is below the applicable significance threshold of 10 in one million.

### Comment No. SWAPE-3

We prepared a preliminary HRA of the Project's construction and operational health-related impact to residential sensitive receptors using the annual PM<sub>10</sub> exhaust estimates from the SWAPE CalEEMod output files (Attachment 2). Consistent with recommendations set forth by OEHHA, we assumed residential exposure begins during the third trimester stage of life. SWAPE's CalEEMod model indicates that Project construction activities will generate approximately 299 pounds of DPM over the 733-day construction period. The AERSCREEN model relies on a continuous average emission rate to simulate maximum downward concentrations from point, area, and volume emission sources. To account for the variability in equipment usage and truck trips over Project construction, we calculated an average DPM emission rate by the following equation:

$$\text{Emission Rate} \left( \frac{\text{grams}}{\text{second}} \right) = \frac{298.8 \text{ lbs}}{733 \text{ days}} \times \frac{453.6 \text{ grams}}{\text{lbs}} \times \frac{1 \text{ day}}{24 \text{ hours}} \times \frac{1 \text{ hour}}{3,600 \text{ seconds}} = \mathbf{0.00214 \text{ g/s}}$$

Using this equation, we estimated a construction emission rate of 0.00214 grams per second ("g/s"). Subtracting the 733-day construction period from the total residential duration of 30 years, we assumed that after construction, the sensitive receptor would be exposed to the Project's operational DPM for an additional 27.99 years, approximately. The Project's operational CalEEMod emissions indicate that operational activities will generate approximately 330 pounds of DPM per year throughout operation. Applying the same equation used to estimate the construction DPM rate, we estimated the following emission rate for Project operation:

$$\text{Emission Rate} \left( \frac{\text{grams}}{\text{second}} \right) = \frac{329.6 \text{ lbs}}{365 \text{ days}} \times \frac{453.6 \text{ grams}}{\text{lbs}} \times \frac{1 \text{ day}}{24 \text{ hours}} \times \frac{1 \text{ hour}}{3,600 \text{ seconds}} = \mathbf{0.004741 \text{ g/s}}$$



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Using this equation, we estimated an operational emission rate of 0.004741 g/s.

### Response to Comment No. SWAPE-3

The assessment provided by SWAPE in this comment significantly overestimated potential diesel exhaust emissions from construction and operation of the proposed Project. For construction, SWAPE incorrectly used the combination of both on-site and off-site emissions (regional emissions) to represent on-site emissions (localized emissions). This assumption is the equivalent of having all diesel delivery and haul trucks that would actually travel regionally to and from the Project Site (up to 20 miles) exclusively on the Project Site. This erroneous assumption grossly overestimates the annual average construction emissions that would occur over the duration of construction.

For operations, the emission rates of diesel exhaust cited are based on the unmitigated regional operational results and assume that these emissions occur each year for approximately 28 years. This assumption suffers from the defect identified above for construction (combination of both on-site and off-site emissions). This assumption is the equivalent of having all vehicular trips that would actually travel regionally to and from the Project Site exclusively on the Project Site. Compounding this mistake is SWAPE's erroneous assumption that all of these emissions would be from an entirely diesel fuel fleet mix when diesel emissions represent only a small fraction of the overall fleet mix. As discussed above, the Project would generate approximately three daily truck deliveries. This is equivalent to 0.2 percent of the total mobile source trips provided in Attachment 2 of the SWAPE letter. Furthermore, the SWAPE analysis assumed approximately 28 years of operation, but held the emission factors constant to the buildout year. Thus, potential impacts would be significantly overstated because it does not represent an average of emissions over the 28 years by failing to account for improvements in the vehicle fleet mix as a result of state mandates over time. As an example, the On-Road Heavy-Duty Diesel Vehicles (In-Use) Regulation requires diesel trucks and buses that operate in California to be upgraded to reduce emissions. By January 1, 2023, nearly all trucks and buses will need to have 2010 model year engines or equivalent.

Furthermore, SWAPE seriously misrepresents the pollutant emissions as only DPM from energy, area, and landscaping sources (e.g., natural gas fireplaces and gasoline



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landscaping equipment) that represent approximately 92 percent of the total exhaust emissions presented by SWAPE. Any potential fireplaces would use natural gas and not diesel. Energy source emissions are from use of natural gas on-site or electricity produced off-site at power plants (largely using natural gas). Landscaping equipment almost exclusively use gasoline or electricity. SWAPE did not provide any supporting documentation as to why it would be appropriate to analyze the particulate matter from natural gas/gasoline combustion as DPM.

### Comment No. SWAPE-4

Construction and operational activity was simulated as a 2.66-acre rectangular area source in AERSCREEN with dimensions of 215 by 50 meters. A release height of three meters was selected to represent the height of exhaust stacks on operational equipment and other heavy-duty vehicles, and an initial vertical dimension of one and a half meters was used to simulate instantaneous plume dispersion upon release. An urban meteorological setting was selected with model-default inputs for wind speed and direction distribution.

### Response to Comment No. SWAPE-4

As discussed above, the SWAPE analysis use of AERSCREEN provides a much less accurate assessment of Project health risks compared to the refined AERMOD evaluation prepared in response to these comments. AERMOD allows for analysis of multiple volume sources and to account for elevation. The use of a single rectangular source with a release height of 3 meters to represent construction and operational activities provided in the SWAPE analysis does not adequately represent the Project Site or sources. In addition, a volume source and not an area source is recommended by the SCAQMD for modeling construction equipment and diesel truck exhaust emissions (SCAQMD LST Guidelines). An area source is two dimensional and meant to represent evaporative emissions from a flat surface, like a pond. A volume source is three dimensional and meant to represent sources like a cloud of dust or diesel exhaust. Thus, modeling as an area source only accounts for the vertical plume dimension, and not horizontal plume dimension. In addition, the SCAQMD LST Guidelines recommend a five-meter release height instead of three meters, which would also overestimate potential concentrations. By accounting for these parameters, the AERMOD model is more representative of likely Project impacts compared to the AERSCREEN model.



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### Comment No. SWAPE-5

The AERSCREEN model generates maximum reasonable estimates of single-hour DPM concentrations from the Project site. EPA guidance suggests that in screening procedures, the annualized average concentration of an air pollutant be estimated by multiplying the single-hour concentration by 10%.<sup>10</sup> Review of Google Earth demonstrates that the nearest sensitive receptors are located immediately adjacent to the Project site. However, review of the AERSCREEN output files (Attachment 3) demonstrates that the *maximally* exposed individual resident ("MEIR") is located approximately 100 meters from the Project site. Thus, the single-hour concentration estimated by AERSCREEN for Project construction is approximately 4.694  $\mu\text{g}/\text{m}^3$  DPM at approximately 100 meters downwind. Multiplying this single-hour concentration by 10%, we get an annualized average concentration of 0.4694  $\mu\text{g}/\text{m}^3$  for Project construction at the MEIR. For Project operation, the single-hour concentration estimated by AERSCREEN is 10.4  $\mu\text{g}/\text{m}^3$  DPM at approximately 100 meters downwind. Multiplying this single-hour concentration by 10%, we get an annualized average concentration of 1.04  $\mu\text{g}/\text{m}^3$  for Project operation at the MEIR.

<sup>10</sup> "Screening Procedures for Estimating the Air Quality Impact of Stationary Sources Revised." EPA, 1992, available at: [http://www.epa.gov/ttn/scram/guidance/guide/EPA-454R-92-019\\_OCR.pdf](http://www.epa.gov/ttn/scram/guidance/guide/EPA-454R-92-019_OCR.pdf); see also "Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments." OEHHA, February 2015, available at: <https://oehha.ca.gov/media/downloads/cnr/2015guidancemanual.pdf> p. 4-36.

### Response to Comment No. SWAPE-5

As discussed above, the SWAPE analysis use of AERSCREEN provides a much less accurate assessment of the actual health risks of the Project compared to the refined AERMOD evaluation used in the HRA prepared in response to these comments. The SWAPE analysis assumes worst-case conditions occur 24 hours per day, 365 days for 3 years (worst-case hourly wind speed, same direction, and stability condition) along with the maximum daily emissions occurring each of those days, assumptions that significantly overestimate actual Project emissions. SWAPE applied a correction factor in the SWAPE analysis to convert the maximum 1-hour concentration average to an annual concentration. However, the SWAPE screening analysis applied the maximum factor of 0.1 instead of an average of 0.08 recommended in OEHHA guidance (Table 4.3, Recommended Factors to Convert Maximum 1-Hour Concentration to Other Averaging Periods, *The Air Toxics Hot*



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*Spots Program Guidance Manual for Preparation of Health Risk Assessments*). Consequently, the already conservative screening analysis was made inaccurate (higher concentration) because SWAPE did not follow the OEHHA guidance.

SWAPE also reported that impacts increased further downwind with the maximum impact occurring at 100 meters. However, it is highly unusual for a screening model to provide a higher concentration further downwind for an area source. Typically, the pollutant travels further away from the source the plume and becomes wider and pollutant concentrations decrease. An exception to this general rule is for a stack/chimney point source where the source is released high enough and with enough velocity/buoyancy that the ground concentrations closer to the source can result in lower pollutant concentrations. The Project does not include a stack/chimney point source. As a result, any findings from the SWAPE analyses based on modeling that shows higher concentrations from an area source further downwind are likely incorrect.

The HRA prepared in response to these comments used AERMOD, which allows representative meteorological data to be used in calculation of annual concentrations. The meteorological monitoring station most representative of the Project Site is the West Los Angeles-VA Hospital Station. This SCAQMD meteorological data provides hourly conditions (e.g., wind speed, wind direction, and stability class) over a five-year period (43,800 hours). The use of AERMOD, which is consistent with SCAQMD recommended methodology for a detailed analysis, provides a more accurate assessment of potential concentrations in comparison to AERSCREEN, which was used in the SWAPE analysis. In summary, use of AERSCREEN in the SWAPE analysis does not adequately characterize potential impacts from the Project, and any conclusions made based on these screening results are flawed and markedly inferior to the more refined dispersion modeling prepared in response to these comments.

### Comment No. SWAPE-6

We calculated the excess cancer risk to the MEIR using applicable HRA methodologies prescribed by OEHHA. Consistent with the IS's proposed construction period, beginning in 2021 and ending in 2023, the annualized average concentration for construction was used for the entire third trimester of pregnancy (0.25 years) and the first 1.76 years of the infantile stage of life (0–2 years) (p. A-18). The annualized average concentration for



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Project operation was used for the remainder of the 30-year exposure period, which makes up the remaining 0.24 years of the infantile stage of life, the entire child stage of life (2–16 years), and the entire the adult stage of life (16–30 years).

Consistent with OEHHA, as recommended by the SCAQMD, BAAQMD, and SJVAPCD guidance, we used Age Sensitivity Factors (“ASF”) to account for the heightened susceptibility of young children to the carcinogenic toxicity of air pollution.<sup>11,12,13</sup> According to this guidance, the quantified cancer risk should be multiplied by a factor of ten during the third trimester of pregnancy and during the first two years of life (infant) as well as multiplied by a factor of three during the child stage of life (2–16 years). We also included the quantified cancer risk without adjusting for the heightened susceptibility of young children to the carcinogenic toxicity of air pollution in accordance with older OEHHA guidance from 2003. This guidance utilizes a less health protective scenario than what is currently recommended by SCAQMD, the air quality district with jurisdiction over the City, and several other air districts in the state. Furthermore, in accordance with the guidance set forth by OEHHA, we used the 95th percentile breathing rates for infants.<sup>14</sup> Finally, according to SCAQMD guidance, we used a Fraction of Time At Home (“FAH”) Value of 1 for the 3rd trimester and infant receptors.<sup>15</sup> We used a cancer potency factor of  $1.1 \text{ (mg/kg-day)}^{-1}$  and an averaging time of 25,550 days. The results of our calculations are shown below.





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The Maximum Exposed Individual at an Existing Residential Receptor (MEIR)						
Activity	Duration (years)	Concentration (ug/m3)	Breathing Rate (L/kg-day)	Cancer Risk without ASFs*	ASF	Cancer Risk with ASFs*
Construction	0.25	0.4694	361	6.4E-07	10	6.4E-06
<b>3rd Trimester Duration</b>	<b>0.25</b>			<b>6.4E-07</b>	<b>3rd Trimester Exposure</b>	<b>6.4E-06</b>
Construction	1.76	0.4694	1090	1.4E-05	10	1.4E-04
Operation	0.24	1.04	1090	4.1E-06	10	4.1E-05
<b>Infant Exposure Duration</b>	<b>2.00</b>			<b>1.8E-05</b>	<b>Infant Exposure</b>	<b>1.8E-04</b>
Operation	14.00	1.04	572	1.3E-04	3	3.8E-04
<b>Child Exposure Duration</b>	<b>14.00</b>			<b>1.3E-04</b>	<b>Child Exposure</b>	<b>3.8E-04</b>
Operation	14.00	1.04	261	4.2E-05	1	4.2E-05
<b>Adult Exposure Duration</b>	<b>14.00</b>			<b>4.2E-05</b>	<b>Adult Exposure</b>	<b>4.2E-05</b>
<b>Lifetime Exposure Duration</b>	<b>30.00</b>			<b>1.9E-04</b>	<b>Lifetime Exposure</b>	<b>6.0E-04</b>

\* We, along with CARB and SCAQMD, recommend using the more updated and health protective 2015 OEHHA guidance, which includes ASFs.

- 11 "Draft Environmental Impact Report (DEIR) for the Proposed The Exchange (SCH No. 2018071058)." SCAQMD, March 2019, available at: <http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2019/march/RVC190115-03.pdf?sfvrsn=8>, p. 4.
- 12 "California Environmental Quality Act Air Quality Guidelines." BAAQMD, May 2017, available at: [http://www.baaqmd.gov/-/media/files/planning-and-research/ceqa/ceqa\\_guidelines\\_may2017.pdf?la=en](http://www.baaqmd.gov/-/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017.pdf?la=en), p. 56; see also "Recommended Methods for Screening and Modeling Local Risks and Hazards." BAAQMD, May 2011, available at: <http://www.baaqmd.gov/-/media/Files/Planning%20and%20Research/CEQA/BAAQMD%20Modeling%20Approach.ashx>, p. 65, 86.
- 13 "Update to District's Risk Management Policy to Address OEHHA's Revised Risk Assessment Guidance Document." SJVAPCD, May 2015, available at: <https://www.valleyair.org/busind/pto/staff-report-5-28-15.pdf>, p. 8, 20, 24.
- 14 "Supplemental Guidelines for Preparing Risk Assessments for the Air Toxics 'Hot Spots' Information and Assessment Act," July 2018, available at: <http://www.aqmd.gov/docs/default-source/planning/risk-assessment/ab2588supplementalguidelines.pdf>, p. 16.  
 "Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments." OEHHA, February 2015, available at: <https://oehha.ca.gov/media/downloads/cnr/2015guidancemanual.pdf>
- 15 "Risk Assessment Procedures for Rules 1401, 1401.1, and 212." SCAQMD, August 2017, available at: [http://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1401/riskassessmentprocedures\\_2017\\_080717.pdf](http://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1401/riskassessmentprocedures_2017_080717.pdf), p. 7.



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### Response to Comment No. SWAPE-6

This comment misconstrues guidance from SCAQMD, wrongly claiming that it recommends use of Age Sensitivity Factors (“ASF”) for construction HRAs. As discussed above in Response to Comment No. 1, SCAQMD is currently evaluating OEHHA’s new Guidance Manual, but has not yet developed any recommendations on its use for CEQA analyses for potential construction impacts. Moreover, the City, as lead agency, has not adopted the new Guidance Manual as part of its CEQA methodology. The City continues to use the 2003 OEHHA Guidance Manual, which remains valid, but does not include age sensitivity factors (ASFs) included in the 2015 Guidance Manual. The consideration of ASFs is not appropriate here because neither the City nor SCAQMD has developed recommendations on whether these factors should be used for CEQA analyses of potential construction impacts, as discussed below. Moreover, existing guidance on when to use early life exposure adjustments to identified carcinogens is limited. The U.S. Environmental Protection Agency (USEPA) provides guidance relating to the use of early life exposure adjustment factors (Supplemental Guidance for Assessing Susceptibility from Early-Life Exposure to Carcinogens, EPA/630/R-003F) whereby adjustment factors are only considered when carcinogens act “through the mutagenic mode of action.” The USEPA has identified 19 compounds that elicit a mutagenic mode of action for carcinogenesis. For diesel particulates, polycyclic aromatic hydrocarbons (PAHs) and their derivatives, which are known to exhibit a mutagenic mode of action, comprise less than one percent of the exhaust particulate mass. To date, the USEPA reports that whole diesel engine exhaust has not been shown to elicit a mutagenic mode of action.<sup>9</sup> Therefore, early life exposure adjustments are neither required nor appropriate, and were therefore not considered in the HRA provided in Attachment A to this memorandum.

SWAPE’s analysis is flawed for the reasons discussed above in Response to Comment No. 1. SWAPE’s simple screening-level HRA was not performed in accordance with requirements included in SCAQMD’s LST methodology and OEHHA’s guidance because it did not account for the following: (1) site-specific conditions; (2) use of a refined

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<sup>9</sup> United States Environmental Protection Agency, 2006. Memorandum: Implementation of the Cancer Guidelines and Accompanying Supplemental Guidance—Science Policy Council Cancer Guidelines Implementation Workgroup, [www.epa.gov/osa/memoranda-about-implementation-cancer-guidelines-and-accompanying-supplemental-guidance-science](http://www.epa.gov/osa/memoranda-about-implementation-cancer-guidelines-and-accompanying-supplemental-guidance-science), accessed January 19, 2021.



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dispersion model; (3) use of SCAQMD mandated meteorological data from the closest/most representative meteorological monitoring site within the Project area; and (4) higher pollutant concentrations at more distant receptors for an area source. In addition, the screening-level HRA has several significant flaws that account for the misleading and incorrect analysis and explain the unrealistically high results.

The first flaw is that SWAPE assumes Project construction would occur at full intensity for seven days per week, including Sundays and holidays over the entire length of construction.

The second flaw is that SWAPE used total regional construction emissions from their CalEEMod output to represent on-site construction activity (SWAPE Letter, p. 7), which means that SWAPE incorrectly assumed that all of the DPM emissions from mobile sources (e.g., delivery and haul truck trips) would all occur at the Project Site. This was also improper because mobile sources, by their very nature, do not generate emissions at a single location but rather along the entire vehicle trip, which would disperse the emissions along regional roadways and not concentrate the emissions at a single location. When conducting HRAs, dispersion of pollutants is a critical consideration because health risk impacts are a direct result of TAC concentrations. The screening operational HRA incorrectly assumed that all mobile source emissions would occur at a single location, which results in concentrations at sensitive receptors that are artificially elevated to highly unreasonable levels.

The third flaw is that SWAPE assumed the Project's "operational activities will generate approximately 329.6 pounds of DPM per year throughout operation (SWAPE Letter, p. 8). This value was calculated based on the total exhaust PM<sub>10</sub> emissions, which includes all area, energy, and mobile source exhaust PM<sub>10</sub> emissions in the CalEEMod operational output files provided by SWAPE. However, SWAPE incorrectly assumed the 329.6 pounds of exhaust PM<sub>10</sub> emissions were the result of diesel fuel combustion. In fact, only a small portion of these operational emissions are DPM. In reality, most of the area and energy exhaust PM<sub>10</sub> emissions are the result of gasoline-fueled landscaping equipment and natural gas combustion for building, heating, and cooking. Similarly, the operational mobile source exhaust PM<sub>10</sub> emissions are from a combination of primarily gasoline-fueled vehicles, such as passenger vehicles and light-duty pick-up trucks, and a smaller number of diesel-fueled trucks, as provided in the vehicle fleet percentages in the



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CARB on-road vehicle emissions factor (EMFAC) model. It is highly inappropriate and factually incorrect to analyze non-diesel fuel exhaust PM<sub>10</sub> emissions as DPM.

For all of these reasons, SWAPE's health risk results are misleading and highly inaccurate and lack credibility. In other words, SWAPE's conclusions are not supported by any credible evidence, much less substantial evidence. Even SWAPE acknowledged the serious limitations in its screening-level study, stating that "[o]ur analysis represents a screening-level HRA, which is known to be conservative and tends to err on the side of health protection."

### Comment No. SWAPE-7

As demonstrated in the table above, the excess cancer risk to adults, children, infants, and during the 3rd trimester of pregnancy at the MEIR located approximately 100 meters away, over the course of Project construction and operation, utilizing age sensitivity factors, are approximately 42, 380, 180, and 6.4 in one million, respectively. The excess cancer risk over the course of a residential lifetime (30 years), utilizing age sensitivity factors, is approximately 600 in one million. The infant, child, adult, and lifetime cancer risks all exceed the SCAQMD threshold of 10 in one million, thus resulting in a potentially significant impact not previously addressed or identified. Utilizing age sensitivity factors is the most conservative, health-protective analysis according to the most recent guidance by OEHHA and reflects recommendations from the air district. Results without age sensitivity factors are presented in the table above, although we do not recommend utilizing these values for health risk analysis. Regardless, the excess cancer risk to adults, children, infants, and during the 3rd trimester of pregnancy at the MEIR located approximately 100 meters away, over the course of Project construction and operation, without age sensitivity factors, are approximately 42, 130, 18, and 0.64 in one million, respectively. The excess cancer risk over the course of a residential lifetime (30 years), without age sensitivity factors, is approximately 190 in one million. The infant, child, adult, and lifetime cancer risks all exceed the SCAQMD threshold of 10 in one million, thus resulting in a potentially significant impact not previously addressed or identified. As such, while we recommend the use of age sensitivity factors, health risk impacts exceed the SCAQMD threshold regardless.



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### **Response to Comment No. SWAPE-7**

As discussed above in Response to Comment No. SWAPE-6, the use of ASFs would not be applicable to this Project, as neither the City nor SCAQMD has developed recommendations on whether these factors should be used for CEQA analyses of potential construction impacts. Furthermore, USEPA provides guidance relating to the use of early life exposure adjustment factors (Supplemental Guidance for Assessing Susceptibility from Early-Life Exposure to Carcinogens, EPA/630/R-003F) whereby adjustment factors are only considered when carcinogens act "through the mutagenic mode of action." The USEPA has identified 19 compounds that elicit a mutagenic mode of action for carcinogenesis. For diesel particulates, polycyclic aromatic hydrocarbons (PAHs) and their derivatives, which are known to exhibit a mutagenic mode of action, comprise less than one percent of the exhaust particulate mass. To date, the USEPA reports that whole diesel engine exhaust has not been shown to elicit a mutagenic mode of action.<sup>10</sup> Therefore, early life exposure adjustments are neither required nor appropriate, and were therefore not considered in the HRA provided as Appendix A to this memorandum.

As discussed above in Response to Comment No. 2, SWAPE's screening-level HRA has several significant flaws that account for the misleading and incorrect analysis and explain the unrealistically high results. As a result, SWAPE's conclusions are misleading and highly inaccurate and lack credibility. In other words, SWAPE's conclusions are not supported by any credible evidence, much less substantial evidence. Even SWAPE acknowledged the serious limitations in its screening-level study, stating that "[o]ur analysis represents a screening-level HRA, which is known to be conservative and tends to err on the side of health protection."

### **Comment No. SWAPE-8**

An agency must include an analysis of health risks that connects the Project's air emissions with the health risk posed by those emissions. Our analysis represents a

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<sup>10</sup> United States Environmental Protection Agency, 2006. Memorandum: Implementation of the Cancer Guidelines and Accompanying Supplemental Guidance—Science Policy Council Cancer Guidelines Implementation Workgroup, [www.epa.gov/osa/memoranda-about-implementation-cancer-guidelines-and-accompanying-supplemental-guidance-science](http://www.epa.gov/osa/memoranda-about-implementation-cancer-guidelines-and-accompanying-supplemental-guidance-science), accessed January 19, 2021.





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screening-level HRA, which is known to be conservative and tends to err on the side of health protection.<sup>16</sup> The purpose of the screening-level construction and operational HRA shown above is to demonstrate the link between the proposed Project's emissions and the potential health risk. Our screening-level HRA demonstrates that construction and operation of the Project could result in a potentially significant health risk impact, when correct exposure assumptions and up-to-date, applicable guidance are used. Therefore, since our screening-level HRA indicates a potentially significant impact, the City should prepare a Project-specific environmental analysis with an HRA, which makes a reasonable effort to connect the Project's air quality emissions and the potential health risks posed to nearby receptors, as well as evaluates whether or not the Project would be likely to cause substantial environmental damage.

<sup>16</sup> "Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments." OEHA, February 2015, available at: <https://oehha.ca.gov/media/downloads/cmr/2015guidancemanual.pdf>, p. 1-5

### **Response to Comment No. SWAPE-8**

This comment requests that a HRA be prepared to assess the Project's air emissions and correlate those emissions to the health risk posed by the Project. As stated previously in Response to Comment No. 1, even though a HRA is not required for the Project, a HRA has been prepared for informational purposes. In addition, while the HRA provides a link between the Project's emissions and potential health risks, directly correlating a single project's emission to quantifiable human health consequences is currently not scientifically feasible, as it is not possible to conduct such an analysis that would provide reliable or meaningful results.<sup>11</sup>

The HRA prepared in response to these comments demonstrates that health risks from the Project would be a maximum of 5.5 in one million for residences north of the Project site, which is well below the applicable significance threshold of 10 in one million. It is noted that this risk assumes an outdoor exposure for the entire length of construction and does not account for any reductions from the time spent indoors, where air quality tends to be better.

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<sup>11</sup> City of Los Angeles, *Air Quality Health Effects (Sierra Club v. County of Fresno)*, October 2019.





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Moreover, the SWAPE analysis is extremely inaccurate. As discussed above in Response to Comment No. 2, the SWAPE assessment substantially overestimated potential diesel exhaust emissions from construction and operation of the proposed Project by misrepresenting regional emissions for localized emissions. The screening level analysis was not performed in accordance with requirements included in SCAQMD's LST methodology, which makes it substantially less accurate than the refined dispersion modeling completed in the HRA prepared in response to these comments. Moreover, the SWAPE analysis also does not account for the following: (1) site-specific conditions; (2) use of a refined dispersion model; (3) use of SCAQMD-mandated meteorological data from the closest/most representative meteorological monitoring site within the Project area; and (4) source-to-receptor distance consistent with SCAQMD LST Guidelines. If the SWAPE analysis properly accounted for the guidance and data discussed above, then the identified cancer risk would have been much lower and below the significance threshold.

## HEALTH RISK ASSESSMENT

Reese Davidson Community Project

*Prepared by:*

Eyestone Environmental, LLC

October 2021

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# 1.0 Executive Summary

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## 1.1 Findings

This report provides an analysis of potential health risk impacts related to the proposed construction and operation of the Reese Davidson Community Project (Project) in the City of Los Angeles, California. The analysis identified the baseline condition around the Project. The analysis also evaluated the Project's incremental change in health risk concentration exposure from diesel exhaust/diesel particulate matter (DPM) emitted by heavy-duty construction equipment during construction and limited heavy-duty delivery trucks during operation<sup>1</sup> of the Project. The findings of the analysis are as follows:

- For carcinogenic exposures (construction and operational), the increase in risk is calculated to be 5.5 in one million, which is less than the applicable threshold of 10 in one million for sensitive receptors immediately north of the Project Site, resulting in a less than significant impact.
- For chronic non-carcinogenic exposures (construction and operational), the increase in the respiratory hazard index was estimated to be less than the applicable threshold of one for sensitive receptors in close proximity to the Project Site, resulting in a less than significant impact.

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<sup>1</sup> *The Project would not support any land uses or activities that would involve the use, storage, or processing of carcinogenic toxic air contaminants. In addition, the proposed land uses would not generally involve the use of heavy-duty diesel trucks with the exception of occasional moving trucks, trash trucks or delivery trucks.*

## 2.0 Introduction

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The Project is a mixed-use development that contains residential dwelling units and retail/restaurant uses. To be clear, this is not the type of project that the regulatory agencies, or the applicable regulatory laws, require to produce a Health Risk Assessment (HRA) for adequate disclosure of potential air quality impacts pursuant to the California Environmental Quality Act (CEQA).

The California Air Pollution Control Officers Association (CAPCOA) Guidance Document for Health Risk Assessments for Proposed Land Use Projects (2009) (CAPCOA HRA Guidance) provides lead agencies with guidance regarding when and how an HRA should be prepared. It bases the risk assessment methodology on the procedures developed by the California Office of Environmental Health Hazard Assessment (OEHHA) to meet the mandates of the Air Toxics "Hot Spots" Information and Assessment Act (AB 2588). The CAPCOA HRA Guidance states that

"[t]here are basically two types of land use projects that have the potential to cause long-term public health risk impacts: Type A – land use projects with toxic emissions that impact receptors; and Type B land use projects that will place receptors in the vicinity of existing toxic sources. Type A project examples are combustion related power plants, gasoline dispensing facilities, asphalt batch plants, warehouse distribution centers, quarry operations, and other stationary sources that emit toxic substances. Type B project examples are stationary sources, high traffic roads, freeways, rail yards, and ports."

Note that the Project does not qualify as either a Type A or Type B project. Accordingly, this HRA was done voluntarily for informational purposes, and respond to comments, and further demonstrates that even if an HRA was necessary (which it was not) the Project would not have a significant air quality impact.

OEHHA adopted the Air Toxics Hot Spots Program Guidance Manual for the Preparation of Risk Assessments (2003 Guidance Manual) in October of 2003. The Guidance Manual was developed by OEHHA, in conjunction with the California Air Resources Board (CARB), for use in implementing the Air Toxics "Hot Spots" Program (Health and Safety Code Section 44360 et. seq.). The Air Toxics "Hot Spots" Program requires stationary sources to report the types and quantities of certain substances routinely released into the air. The goals of the Air Toxics "Hot Spots" Program are to collect emission data, to identify facilities having localized impacts, to ascertain health risks,



to notify nearby residents of significant risks, and to reduce those significant risks to acceptable levels.

OEHHA adopted a new version of the Air Toxics Hot Spots Program Guidance Manual for the Preparation of Risk Assessments (2015 Guidance Manual) in March of 2015.<sup>2</sup> CARB acknowledges that the Guidance Manual does not include guidance for CEQA and that it would be “handled by individual [Air Pollution Control] Districts.”<sup>3</sup> The intent in developing the 2015 Guidance Manual was to provide HRA procedures for use in the Air Toxics Hot Spots Program or for the permitting of new or modified stationary sources. As noted above, the Project is not a new or modified stationary source that requires air quality permits to construct or operate. Air districts are to determine which facilities will prepare an HRA based on a prioritization process. The 2015 Guidance Manual provides recommendations related to cancer risk evaluation of short-term projects. As discussed in Section 8.2.10 of the 2015 Guidance Manual, “[t]he local air pollution control districts sometimes use the risk assessment guidelines for the Hot Spots program in permitting decisions for short-term projects such as construction or waste site remediation.” Thus, to be conservative, this HRA was prepared in part to analyze potential construction impacts, even though short-term projects that would require a permitting decision by South Coast Air Quality Management District (SCAQMD) typically would be limited to site remediation (e.g., stationary soil vapor extractors) and would not be applicable to the Project. The 2015 Guidance Manual does not provide specific recommendations for evaluation of short-term use of mobile sources (e.g., heavy-duty diesel construction equipment). In addition, potential operational impacts, despite the fact that no considered stationary source is part of the Project’s land uses, were assessed for informational purposes given the limited use of heavy-duty trucks associated with occasional moving trucks, trash trucks and delivery trucks.

OEHHA’s 2015 Guidance Manual provides Age Sensitivity Factors (ASFs) to account for potential increased sensitivity of early-in-life exposure to carcinogens. A review of relevant guidance was conducted to determine applicability of the use of early life exposure adjustments to identified carcinogens. For risk assessments conducted under the auspices of The Air Toxics “Hot Spots” Information and Assessment Act (AB 2588, Connelly, Statutes of 1987; Health and Safety Code Section 44300 et seq.) a weighting factor is applied to all carcinogens regardless of purported mechanism of action. The use of these factors would not be applicable to this HRA as neither the Lead Agency nor SCAQMD have developed recommendations on whether these factors should be used for

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<sup>2</sup> Office of Environmental Health Hazard Assessment, *Air Toxicology and Epidemiology, Adoption of Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments*. March 6, 2015, [www.oehha.ca.gov/air/hot\\_spots/hotspots2015.html](http://www.oehha.ca.gov/air/hot_spots/hotspots2015.html).

<sup>3</sup> CARB, *Risk Management Guidance for Stationary Sources of Air Toxics*, July 23, 2015, p. 19, [www.arb.ca.gov/toxics/rma/rmgssat.pdf](http://www.arb.ca.gov/toxics/rma/rmgssat.pdf).

CEQA analyses of potential DPM construction or operational impacts. For this assessment, the HRA relied upon United States Environmental Protection Agency (USEPA) guidance relating to the use of early life exposure adjustment factors (Supplemental Guidance for Assessing Susceptibility from Early-Life Exposure to Carcinogens, EPA/630/R-003F) whereby adjustment factors are only considered when carcinogens act “through the mutagenic mode of action.” The USEPA has identified 19 compounds that elicit a mutagenic mode of action for carcinogenesis. For DPM, polycyclic aromatic hydrocarbons (PAHs) and their derivatives, which are known to exhibit a mutagenic mode of action, comprise less than one percent of the exhaust particulate mass. To date, the USEPA reports that whole diesel engine exhaust has not been shown to elicit a mutagenic mode of action. Therefore, early life exposure adjustments were not considered in this HRA.

In addition, the *L.A. City CEQA Thresholds Guide* (Thresholds Guide) states that “impacts from toxic air contaminants can occur during either the construction or operational phases of a project. During certain construction activities, potential releases of toxic air contaminants could occur during site remediation activities or during building demolition. Toxic air contaminants may also be released during industrial or manufacturing processes, or other activities that involve the use, storage, processing, or disposal of toxic materials.”<sup>4</sup> Importantly, note that, the Thresholds Guide does not specifically recommend an HRA for short-term DPM emissions from construction activities or for operational activities when land uses are not “industrial or manufacturing processes, or other activities that involve the use, storage, processing, or disposal of toxic materials.” The Thresholds Guide also sets forth the following factors for consideration on a case-by-case basis in making a determination of significance with regard to toxic air contaminants: the regulatory framework for the toxic material(s) and process(es) involved; the proximity of the toxic air contaminants to sensitive receptors; the quantity, volume, and toxicity of the contaminants expected to be emitted; the likelihood and potential level of exposure; and the degree to which project design will reduce the risk of exposure. Consistent with City of Los Angeles guidance an HRA is not required for the Project.

Also, CARB published and adopted the *Air Quality and Land Use Handbook: A Community Health Perspective*, 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).<sup>5</sup> SCAQMD adopted similar recommendations in its *Guidance Document for Addressing Air Quality Issues in General Plans and Local*

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<sup>4</sup> City of Los Angeles, *CEQA Thresholds Guide*, 2006, p. B.3-2.

<sup>5</sup> CARB, *Air Quality and Land Use Handbook, a Community Health Perspective*, April 2005.

*Planning*.<sup>6</sup> Together, the CARB and SCAQMD guidelines recommend siting distances for both the development of sensitive land uses in proximity to Toxic Air Contaminates (TAC) sources and the addition of new TAC sources in proximity to existing sensitive land uses. 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. Applied here, the Project does not site new sensitive land uses near existing sources of air toxic emissions.

The primary sources of potential air toxics associated with Project operations include DPM from delivery trucks (e.g., truck traffic on local streets and idling on adjacent streets associated with occasional moving trucks, trash trucks and delivery trucks). However, these activities, and the land uses associated with the Project, are not considered land uses that generate substantial TAC emissions based on review of the air toxic sources listed in SCAQMD's and CARB's guidelines. It should be noted that the SCAQMD recommends that HRAs be conducted for substantial individual sources of DPM (e.g., truck stops and warehouse distribution facilities that generate more than 100 trucks per day or more than 40 trucks with operating transport refrigeration units) and has provided guidance for analyzing mobile source diesel emissions.<sup>7</sup> Based on this guidance, the Project is not considered these types of land uses and is not considered to be a substantial source of operational DPM warranting a refined HRA since daily truck trips to the Project Site would not exceed 100 trucks per day or more than 40 trucks with operating transport refrigeration units. In addition, the CARB-mandated ATCM limits diesel-fueled commercial vehicles (delivery trucks) to idle for no more than 5 minutes at any given time, which would further limit diesel particulate emissions.

Although a construction and operational HRA is not required for the reasons discussed above, for informational purposes only, this HRA has been prepared to provide a good faith and reasoned response to public comments and to provide the City with additional substantial evidence that demonstrates that the Project would not create a significant health risk impact.

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<sup>6</sup> SCAQMD, *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*, May 6, 2005.

<sup>7</sup> SCAQMD, *Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*, 2003.

## 3.0 Health Risk Assessment

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### 3.1 Project Description

The Reese Davidson Community Project (Project) proposes a new mixed-use development on an approximate 115,674 square-foot site (2.7 acres). The Project Site is located on the west and east side of the Grand Canal, which traverses the Project Site and is located in the Venice Community Plan area of the City of Los Angeles (City). The Project would provide a total of 140 residential units, which would consist of up to 136 affordable and permanent supportive housing units. In addition, the Project contains approximately 685 square feet of onsite supportive service office uses, approximately 2,255 square feet of retail uses, approximately 810 square feet of (indoor) restaurant uses<sup>8</sup>, approximately 500 square feet of outdoor restaurant service area, and approximately 2,875 square feet of art studio use. Upon completion, 103,957 square feet of floor area would be located within the Project Site and include 357 automobile parking spaces, as well as 136 bicycle parking spaces (117 long term and 19 short term).

Certain activities would emit DPM from heavy-duty trucks and heavy-duty equipment used during construction and to a lesser extent heavy-duty trucks accessing the Project Site during operation of the Project associated with occasional moving trucks, trash trucks and delivery trucks. CARB and OEHHA have classified DPM as a carcinogen.

Single-family and multi-family residential uses are located north, east, and south of the Project Site along North Venice Boulevard, Dell Avenue, and South Venice Boulevard. There are residential uses adjacent to the Project Site at the southwest corner of North Venice Boulevard and Dell Avenue.

### 3.2 The Assessment Process

The risk assessment process provided in OEHHA's 2003 Guidance Manual consists of four basic steps: (1) hazard identification; (2) exposure assessment; (3) dose-response assessment; and (4) risk characterization.<sup>9</sup> In the first step, hazard identification involves

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<sup>8</sup> Pursuant to the Venice Coastal Zone Specific Plan Parking Requirement Table (Section 13D), the parking required for a restaurant use is based on the area of the Service Floor (i.e., does not include the kitchen or other similar "back of house" areas). The Service Floor area of the Project is 560 square feet.

<sup>9</sup> Office of Environmental Health Hazard Assessment, *The Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments*, August 2003, Page 1-6.

determining the potential health effect which may be associated with emitted pollutants. The purpose is to identify qualitatively whether a pollutant is a potential human carcinogen or is associated with other types of adverse health effects. Depending on the chemical, these health effects may include short-term ailments or chronic diseases. The dose-response assessment is designed to characterize the relationship between the amount or dose of a chemical and its toxicological effect on the human body. Responses to toxic chemicals will vary depending on the amount and length of exposure. For example, short-term exposure to low concentrations of chemicals may produce no noticeable effect, but continued exposure to the same levels of chemicals over a long period of time may eventually cause harm. The purpose of the exposure assessment is to estimate the extent of exposure to each substance for which risk will be evaluated. This involves emission quantification, modeling of environmental transport, identification of chemicals of concern, identification of exposure routes, identification of exposed populations, and estimation of long-term exposure levels. Risk characterization is an integration of the health effects and public exposure information developed for emitted pollutants to provide a quantitative probability of adverse health effects.

### 3.3 Source Identification and Characterization

#### 3.3.1 Source Identification

As indicated above, the primary source of potential air toxics associated with the Project is DPM from heavy-duty trucks and heavy-duty construction equipment used during construction and to a lesser extent heavy-duty trucks accessing the Project Site during operation of the Project associated with occasional moving trucks, trash trucks and delivery trucks. The SCAQMD recommends that an HRA be conducted for substantial sources of long-term DPM operational sources (e.g., truck stops and warehouse distribution facilities) and has provided guidance for analyzing mobile source diesel emissions.<sup>10</sup> While Project construction and operation would not represent a long-term source of DPM emissions<sup>11</sup>, the SCAQMD Guidance was used for purposes of modeling parameters and assumptions.

#### 3.3.2 Source Characterization

##### Construction

As discussed in the Initial Study, Project construction is anticipated to be constructed in three phases:

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<sup>10</sup> SCAQMD, *Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Emissions*, August 2003.

<sup>11</sup> *Project construction is short term—28 months. Moreover, the Project is residential, commercial, and open spaces uses, none of which are associated with significant heavy-duty truck use or significant DPM emissions.*

- Phase 1A (West Site): Construction of mixed-use housing development, including 56 residential units, approximately 3,325 square feet of non-residential uses, 105 parking spaces for all residential uses on the Project Site as well as commercial uses.
- Phase 1B (East Site): Construction of a four-level public parking structure with a partially below grade level, providing up to 252 parking spaces.
- Phase 2: (East Site): Construction of three-story housing development, including 77 housing units, 425 square feet of onsite supportive service office uses, and approximately 2,875 square feet of art studio use.

The estimated depth of excavation is anticipated to range from approximately five feet to 10 feet below grade when accounting for mat footings. It is estimated that approximately 3,600 cubic yards of export material (e.g., concrete and asphalt surfaces, and demolished multi-family residential building) and 5,500 cubic yards of soil would be hauled from the Project Site during the demolition and excavation phase.

Total DPM emissions over the duration of Project construction were calculated using the SCAQMD recommended California Emissions Estimator Model (CalEEMod). Modeling assumptions were developed consistent with the Initial Study and are included in Appendix A. The calculations of the emissions generated during Project construction activities reflect the types and quantities of construction equipment and haul trucks that would be used to complete the proposed construction activities.

CalEEMod calculates annual emissions based on worst-case conditions occurring on a daily basis. This scenario would not represent real world conditions as construction activities and equipment would not be expected to operate at 100 percent on an average daily basis. Construction surveys prepared for CARB have documented that on a typical construction site, daily average equipment hours range from 2 to 7.5 hours depending on the type of equipment.<sup>12</sup> Therefore, an adjustment was taken into account which assumes that annual average emissions would conservatively represent 80 percent of daily activity.

It was assumed that all on-site (e.g., off-road equipment) equipment would be diesel and, therefore, on-site exhaust PM<sub>10</sub> emissions provided in the CalEEMod output file were included in this HRA as DPM. The CalEEMod output file is provided in Appendix A of this HRA.

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<sup>12</sup> California Air Resources Board, *Characterization of the Off-Road Equipment Population*, December 2008.



## Operation

As discussed above, the Project would provide a total of 140 residential units, which would consist of up to 136 affordable and permanent supportive housing units. In addition, the Project contains approximately 685 square feet of onsite supportive service office uses, approximately 2,255 square feet of retail uses, approximately 810 square feet of (indoor) restaurant uses, approximately 500 square feet of outdoor restaurant service area, and approximately 2,875 square feet of art studio use. Upon completion, 103,957 square feet of floor area would be located within the Project Site and include 357 automobile parking spaces, as well as 136 bicycle parking spaces (117 long term and 19 short term). A conservative estimate of the number of daily truck trips is provided below based on the National Cooperative Highway Research Program Truck Trip Generation Data.<sup>13</sup>

- Table D-2e of the NCHRP data (Trip Generation Summary—Daily Commercial Vehicle Trips per 1,000 sf of Building Space for Other Land Uses (includes housing)) provides an average of 0.011 truck trips per 1,000 sf or approximately one delivery truck per day for the Project's 65,095 square feet (140 dwelling units or 64,410 square feet and residential supportive services) of residential uses. It is conservatively assumed that all delivery trucks would be heavy-duty diesel trucks even though many residential truck deliveries are from smaller gasoline trucks (e.g., UPS or FedEx).
- Table D-2c of the NCHRP data (Trip Generation Summary—Daily Commercial Vehicle Trips per 1,000 sf of Building Space for Retail (includes restaurants) provides an average of 0.324 truck trips per 1,000 sf. The Project's 3,535 square feet of retail/restaurant square feet of development would generate approximately one delivery per day. Once again, this assumes that all trucks would be diesel even though many retail truck deliveries are from smaller gasoline trucks (e.g., UPS or FedEx). It was assumed that the delivery truck would be equipped with a transportation refrigeration unit (TRUs) related to restaurant use.
- Table D-3d of the NCHRP data (Trip Generation Summary—Daily Commercial Vehicle Trips per 1,000 sf of Building Space for Cultural, Recreation, Entertainment provides an average of 0.21 truck trips per 1,000 sf. The Project's 2,875 square feet of art studio use would generate one delivery per day. Once again, this assumes that all trucks would be diesel even though many truck deliveries are from smaller gasoline trucks (e.g., UPS or FedEx).

<sup>13</sup> National Cooperative Highway Research Program (NCHRP) Synthesis 298 Truck Trip Generation Data, 2001, [http://onlinepubs.trb.org/onlinepubs/nchrp/nchrp\\_syn\\_298.pdf](http://onlinepubs.trb.org/onlinepubs/nchrp/nchrp_syn_298.pdf).

Accordingly, the Project is estimated to generate approximately three truck deliveries per day during operation.

Emissions from TRUs were estimated using the CARB Draft 2019 Emissions Inventory for Transportation Refrigeration Units.<sup>14</sup> Emissions from delivery trucks travelling to and from the Project Site as well as idling were estimated using the CARB EMFAC2021 model.<sup>15</sup> Trucks travelling to/from the loading docks generate emissions through truck engine idling, TRU operation and travelling.

Importantly, note that, with respect to truck emissions associated with the operation of projects, the SCAQMD recommends that HRAs be conducted for substantial sources of DPM for developments that include truck stops and warehouse distribution facilities that generate more than 100 trucks per day or more than 40 trucks with operating TRUs. In other words, SCAQMD has identified an amount of truck trips per day that could warrant conducting an HRA to analyze emissions and health risks. Projects with truck trips below the aforementioned amounts should not be considered a substantial source of DPM and HRAs are neither recommended nor required by the applicable regulatory documents. As set forth above, operational truck use is well below both of these benchmarks.

Specifically, the Project is not considered to be a substantial source of operational DPM warranting an HRA because there are only three daily truck trips to the Project Site, which is far below the either more-than-100-trucks-per-day or more-than-40-TRU-trucks-per-day that indicate when a project could be considered a substantial DPM source. Nonetheless, operational health risks from use of operational delivery trucks for the Project was evaluated for informational purposes and included in this HRA.

Note also that, based on SCAQMD guidance, there is no quantitative analysis required for future cancer risk within the vicinity of the Project because it is consistent with the recommendations regarding the siting of new sensitive land uses near potential sources of TAC emissions provided in the SCAQMD Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning.

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<sup>14</sup> California Air Resources Board. Draft 2019 Update to Emissions Inventory for Transportation Refrigeration Units. October 2019.

<sup>15</sup> Airborne Toxic Control Measure is set forth in title 13, CCR, section 2485 and requires that drivers of diesel-fueled commercial motor vehicles with gross vehicle weight ratings greater than 10,000 pound not idle the vehicle's primary diesel engine longer than five minutes at any location. 5-minute idle time applies to all heavy-duty truck – construction as well as operational trucks.

### 3.3.3 Baseline and Identification of Chemicals of Concern

The SCAQMD released the fifth round of its Basin-wide Multiple Air Toxics Exposure Study (MATES V – Final Report) in August 2021.<sup>16</sup> MATES V estimated the cancer risk from TAC emissions throughout the Basin by conducting a monitoring program, an updated emissions inventory of TACs, and a modeling effort to characterize health risks in the air basin. As part of MATES V, the SCAQMD prepared an interactive map that shows estimates of cancer risks in the Basin from ambient levels of TACs based on the modeling effort to provide insight into relative risks. The map reports estimated cancer risks for discrete two-kilometer-by-two-kilometer grid cells. The cancer risk estimates reported there should not be interpreted as actual rates of disease in the exposed population, but rather as estimates of potential risk, based on a number of conservative assumptions. In general, MATES V indicates that the highest cancer risks from TACs are found near shipping ports, goods movement sources, and near freeways and other transportation corridors. The coastal portion of Los Angeles falls in an estimated range of 300 to 845 risks per one million. The Project Site falls in an estimated range of 529 cancer risks per one million.<sup>17</sup> Compared to previous studies of air toxics in the Basin, the MATES V study found decreasing air toxics exposure from the analysis done in the MATES IV time period.

This HRA identifies the baseline condition and also identifies the actual additional risks due to certain emissions associated with the Project. Note that, as discussed above, the adopted CAPCOA regulatory guidance indicates that HRAs should assess Type A (toxic emissions) and Type B (placing receptors near existing toxic sources) projects within the CEQA context. This HRA presents the incremental health risks analysis even though the Project does not squarely qualify as either a Type A or Type B project. Accordingly, this voluntary HRA analysis is informational, and further informs the public and decision makers, but is not required pursuant to the current laws in effect. Nonetheless, this HRA quantitatively evaluated DPM as a chemical of concern for potential health effects in two categories, carcinogenic and non-carcinogenic.

## 3.4 Exposure Quantification

Consistent with SCAQMD's Localized Significance Threshold Methodology (LST Guidelines), this HRA used USEPA's Regulatory Model AERMOD to assess the downwind

<sup>16</sup> SCAQMD Multiple Air Toxics Exposure Study (MATES V) Final Report. August 2021

<sup>17</sup> SCAQMD, MATES V Carcinogenic Risk Interactive Map, [https://experience.arcgis.com/experience/79d3b6304912414bb21ebdde80100b23/page/home/?data\\_id=dataSource\\_112-7c8f2a4db79b4a918d46b4e8985a112b%3A17739&views=view\\_38%2Cview\\_10](https://experience.arcgis.com/experience/79d3b6304912414bb21ebdde80100b23/page/home/?data_id=dataSource_112-7c8f2a4db79b4a918d46b4e8985a112b%3A17739&views=view_38%2Cview_10)

extent of DPM concentrations from proposed construction and operational activities.<sup>18</sup> AERMOD accounts for a variety of refined, site-specific conditions that facilitate an accurate assessment of Project impacts. AERMOD's air dispersion algorithms are based upon a planetary boundary layer turbulence structure and scaling concepts, including the treatment of surface and elevated sources in simple and complex terrain.

Exhaust emissions from construction and operational equipment were treated as a set of side-by-side elevated volume sources. The release height was assumed to be 12 feet. This represents the mid-range of the expected plume rise from frequently used construction equipment and operational heavy-duty trucks during daytime atmospheric conditions. All construction exhaust emissions were assumed to take place over a 36-month (3 years) duration on weekdays between 7 A.M. to 3 P.M. (8-hour period). Operational exhaust emissions were assumed to take place 6-days per week between 7 A.M. to 3 P.M. (8-hour period) and included 15 minutes of idle time to account for ingress, egress, and travel on-site.<sup>19</sup>

Air dispersion models require additional input parameters including local meteorology and receptors. Due to the sensitivity to individual meteorological parameters such as wind speed and direction, the USEPA 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 West Los Angeles monitoring station (Source Receptor Area 2) were used to represent local weather conditions and prevailing winds.

Cartesian receptor grids were used to represent adjacent and nearby sensitive land uses. The Cartesian receptor grids were placed at each sensitive use with a built in 10 meter spacing for nearby residential uses. All receptors were placed at ground level, which is recommended by SCAQMD for AERMOD modeling. Elevations for both sources and receptors were provided by the U.S. Geological Survey (USGS) and included using the AERMOD terrain processor AERMAP.

DPM modeled concentrations were used to calculate cancer risk and chronic hazard index at each relevant receptor. A graphical representation of the source-receptor grid network is presented in Appendix C.

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<sup>18</sup> SCAQMD, *Final-Localized Significance Threshold Methodology*, 2008

<sup>19</sup> SCAQMD, *Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*, 2003, [www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis](http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis).

## 3.5 Risk Characterization

### 3.5.1 Carcinogenic Chemical Risk

Health risks associated with exposure to carcinogenic compounds at sensitive land uses in close proximity to the Project 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 SCAQMD recommends a threshold of ten in one million cancer risk for evaluating carcinogenic impacts at sensitive receptors.<sup>20</sup>

The equation used to calculate the potential excess cancer risk is:

$$\text{Risk}_i = C_i \times \text{CP}_i \times \text{DBR} \times \text{EVF}$$

Where:

$\text{Risk}_i$  = Lifetime Excess Cancer Risk from exposure to chemical<sub>i</sub>  
 $C_i$  = Representative Air Concentration for chemical<sub>i</sub> ( $\mu\text{g}/\text{m}^3$ )  
 $\text{CP}_i$  = Cancer Potency<sub>i</sub> ( $\text{mg}/\text{kg}\text{-day}$ )<sup>-1</sup>  
 $\text{DBR}$  = Daily Breathing Rate ( $\text{L}/\text{kg}$  body weight-day)  
 $\text{EVF}$  = Exposure Value Factor (unitless)

An estimate of an individual's incremental excess cancer risk from exposure to Project construction and operational DPM emissions is calculated by summing the chemical-specific excess cancer risks. In addition, cancer risk is evaluated based on the duration on which a sensitive receptor is exposed to DPM (exposure duration). Based on OEHHA guidelines, it is recommended that cancer risk analyses assume an exposure duration of 70-years for residential receptors.<sup>21</sup> The exposure duration takes into account the construction duration of 36 months during construction, and operational emissions occurring each year.

<sup>20</sup> South Coast Air Quality Management District Air Quality Significance Thresholds. [www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2](http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2).

<sup>21</sup> Air Toxics Hot Spots Program Risk Assessment Guidelines. Office of Environmental Health and Hazard Assessment. August 2003

### 3.5.2 Non-Carcinogenic Chemical Risk

The potential for chronic non-carcinogenic health effects is evaluated by calculating the total hazard index (HI) for the Project construction and operational DPM emissions. This HI represents the sum of the hazard quotients (HQs) developed for each individual project-related chemical, where a HQ is the ratio of the representative air concentration of the chemical to the chemical specific non-cancer Reference Exposure Level (REL). The non-cancer RELs represent the daily average exposure concentration at (or below) which no adverse health effects are anticipated.

The equations used to calculate the chemical-specific HQs and HIs are:

$$\begin{aligned} \text{HQ}_i &= C_i/\text{REL}_i \\ \text{HI} &= \sum \text{HQ}_i \end{aligned}$$

Where:

$$\begin{aligned} \text{HQ}_i &= \text{Hazard Quotient for chemical}_i \\ C_i &= \text{Average Daily Air Concentration for chemical}_i \text{ (}\mu\text{g/m}^3\text{)} \\ \text{REL}_i &= \text{Noncancer Reference Exposure Level for chemical}_i \text{ (}\mu\text{g/m}^3\text{)} \\ \text{HI} &= \text{Hazard Index} \end{aligned}$$

The SCAQMD recommends that the non-carcinogenic hazards of toxic air contaminants should not exceed a hazard index of 1.0 for either chronic or acute effects.<sup>22</sup> Acute effects are due to short-term exposure, while chronic effects are due to long-term exposure to a substance. For chronic and acute risks, the hazard index is calculated as the summation of the hazard quotients for all chemicals to which an individual would be exposed. The acute hazard index was not quantified since an inhalation REL has not been determined by the OEHHA for DPM.

## 3.6 Conclusions

The results from the health risk calculations provide an estimate of the potential risks and hazards to individuals through inhalation of Project construction DPM emissions over a 28-month duration. Consistent with OEHHA guidelines, health risk impacts from Project operational DPM emissions were assessed over a 70-year exposure duration for residential receptors. The estimated risks and hazards include: lifetime excess cancer risk estimates, and cumulative chronic HI estimates for the receptor locations of concern.

<sup>22</sup> South Coast Air Quality Management District Air Quality Significance Thresholds. [www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2](http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2).



As shown in Appendix B and in Table 1 on page 16, the results of the HRA yields a maximum off-site individual cancer risk of 5.5 in a million for residential uses located northeast of the Project site, along North Venice Boulevard (for combined construction and operational emissions)<sup>23</sup>. The maximum chronic risk of 0.062 occurs within this same residential receptor area. As the Project (construction and operational emissions, separate and cumulative) would not emit carcinogenic or toxic air contaminants that result in impacts which exceed the maximum individual cancer risk of ten in one million or the chronic index of 1.0, Project-related toxic emission impacts would be less than significant.

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<sup>23</sup> *As combined emissions (construction and operations) are below significance thresholds, individual emissions (i.e., construction separate from operational emission) are necessarily below the significance thresholds and the thresholds are the same as between the two.*

**Table 1**  
**Health Risk Assessment (Combined Construction and Operational Emissions)**

<b>Risk</b>	<b>Significance Threshold</b>	<b>Calculated Risk</b>	<b>Significant Impact</b>
Cancer Risk (Resident)	10 in 1 Million	5.5 E-06 which denotes excess cases of cancer of 5.5 in one million	No
Non-Carcinogenic Risk (Maximum)	Chronic Index (HI) of 1.0	6.2E-02 which denotes an HI of 0.062	No

## 4.0 Uncertainty Assessment

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Evaluating carcinogenic pollutant concentrations based on OEHHA methodology and SCAQMD Guidance has an implied uncertainty. These methodologies were developed to provide a conservative health risk estimate. The conservative nature of this methodology relies on a number of inputs designed to prevent an underestimation of risk. The following discusses the conservative nature of the risk assessment analysis assumptions utilized in this analysis.

The cancer risk from DPM occurs mainly through inhalation. Output from the dispersion analysis was used to estimate the DPM concentrations. The cancer risk estimate is then calculated based on those estimated DPM concentrations using the risk methodology promulgated by OEHHA. The risk assessment guidelines established by SCAQMD and included in the analysis are designed to produce conservative (high) estimates of the risk posed by DPM, due to the following factors:

- As a conservative measure, the SCAQMD does not recognize indoor adjustments for residential uses. However, studies have shown that the typical person spends approximately 87 percent of their time indoors, 5 percent of their time outdoors, and 7 percent of their time in vehicles. A DPM exposure assessment showed that an average indoor concentration was 2.0 µg/m<sup>3</sup>, compared with an outdoor concentration of 3.0 µg/m<sup>3</sup>.<sup>24</sup>
- OEHHA has a toxicity database that lists TACs and their URFs. A URF describes the cancer potency of a particular TAC and is used to estimate cancer risk.<sup>4</sup> Most of these URFs are extrapolated from animal studies based on continuous exposure to particular toxin. This method can have some significant uncertainties. For example, a chemical that is carcinogenic by one route of exposure is considered to be carcinogenic for all routes of exposure at its maximum potency. Also, it is not realistic for a receptor to be exposed to a continuous concentration of TACs over time. In reality, receptors are exposed to constantly changing concentration levels that would expose receptors to lower levels of TACs over time than analyzed in this analysis.
- The use of the SCAQMD meteorological data set and conservative exposure assumptions (e.g., assumes receptor would be located outside in the same location 24 hours per day for the entire construction duration) amongst others, likely also lead to overestimated risks.

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<sup>24</sup> South Coast Air Quality Management District (SCAQMD), *Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Emissions*, 2002.

As such, uncertainty in the health risk analysis is conservative in nature and is designed to prevent undisclosed impacts to human health. Concentrations reported in this report represent a conservative scenario that is likely an over estimation of actual pollutant concentrations.

# Appendix A

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## Emissions Calculations



# Reese Davidson Community Project Assumptions

## Land Use for Proposed Development

	du	sf	Truck Trips/TSE	Truck Trips	
Total Residential (apartment mid rise)	140	65,095	0.011	0.72	Includes 685 sf of residential services
Restaurant (High Turnover Sit Down) and Retail		3,535	0.324	1.15	Includes 500 feet of outdoor restaurant service area
Community Arts (CalEEMod Library)		2,875	0.21	0.60	Table D-3d Cultural, Recreation, Entertainment
Enclosed Parking	357 spaces				
Total:				2.47	

Construction Details	Start Date	End Date	Duration (Months)	Days
Phases 1A, 1B, 2			36	
Demolition	3/1/2021	3/30/2021	1	22
Grading/Excavation	4/1/2021	5/31/2021	2	43
Mat Foundation Pour (1A)	6/1/2021	6/10/2021	0	8
Building Foundation (1A)	6/11/2021	7/31/2021	2	36
Mat Foundation Pour (1B)	8/1/2021	8/10/2021	0	7
Building Construction (1A) and Foundation (1B)	8/11/2021	10/31/2021	3	58
Building Construction (1A and 1B)	11/1/2021	12/31/2021	2	45
Mat Foundation Pour (2)	1/1/2022	1/10/2022	0	6
Building Construction (1A and 1B) and Foundation (2)	1/11/2021	1/31/2022	13	276
Building Construction (1A, 1B, and 2)	2/1/2022	10/31/2022	9	195
Building Construction (2)	11/1/2022	2/28/2024	16	347
1A and 1B Paving/Landscape	8/1/2022	11/1/2022	3	67
2 Paving/Landscape	1/1/2024	2/28/2024	2	43
Architectural Coatings	7/1/2022	2/1/2023	7	154
Site Acreage				
	2.70			
Demolition Quantities				
Cubic Yards	3,600			
Import/Export Quantities during Grading	(CY)			
Import				
Export	9,100			
Mat Footing (Concrete)	(CY)			
Concrete	3,000			

Equipment	Demo	Excavation	Foundation	Mat Foundation	Building Construction and Foundation	Building Construction (1A, 1B, 2)	Building Construction (2)	Paving/Landscape
Air Compressor	1		1		1	1	1	
Aerial Lift					1	1	1	
Bore/Drill Rig		1						
Cement and Mortar Mixers								
Concrete/Industrial Saws	1		1		1	1	1	
Cranes (Tower)								
Cranes (Mobile)		1		1	1	1	1	
Crawler Tractors								
Crushing/Proc. Equipment								
Excavators		1						
Forklifts			1		1	1	1	1
Generator Sets								
Graders								
Off-Highway Tractors								
Water Truck	1	1						
Pavers								
Paving Equipment								1
Pumps		1	1	4	1			
Plate Compactors								
Rollers								
Rough Terrain Forklifts								
Rubber Tired Dozers		1						
Rubber Tired Loaders								
Scrapers								
Signal Boards								
Skid Steer Loaders								1
Surfacing Equipment								
Tractors/Loaders/Backhoes	2	1	1		1	1	1	
Trenchers								
Welders			1		1	1	1	
Other ( )								
Total Pieces	5	7	6	5	8	7	7	3



Reese Davidson (Venice) - Construction Onsite - South Coast Air Basin, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied****Reese Davidson (Venice) - Construction Onsite  
South Coast Air Basin, Annual****1.0 Project Characteristics****1.1 Land Usage**

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Library	2.88	1000sqft	0.07	2,875.00	0
Enclosed Parking with Elevator	357.00	Space	3.21	142,800.00	0
High Turnover (Sit Down Restaurant)	3.54	1000sqft	0.08	3,535.00	0
Apartments Mid Rise	140.00	Dwelling Unit	3.68	65,095.00	400

**1.2 Other Project Characteristics**

Urbanization	Urban	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	31
Climate Zone	11			Operational Year	2023

Utility Company Los Angeles Department of Water &amp; Power

CO2 Intensity (lb/MWhr)	691.98	CH4 Intensity (lb/MWhr)	0.033	N2O Intensity (lb/MWhr)	0.004
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**1.3 User Entered Comments & Non-Default Data**

Project Characteristics -

Land Use - Reflects Project Description

Construction Phase - see assumptions

Off-road Equipment - site specific

Off-road Equipment -

Off-road Equipment - site specific

Off-road Equipment - see assumptions

Off-road Equipment - site specific

Off-road Equipment - see assumptions

Off-road Equipment - site specific

Off-road Equipment - see assumptions

Off-road Equipment - see assumptions

Off-road Equipment - see assumptions

Off-road Equipment - see assumptions

Off-road Equipment - Site Specific

Off-road Equipment - site specific

Off-road Equipment - see assumptions

Off-road Equipment - see assumptions

Trips and VMT - see assumptions

Demolition -

Grading - see assumptions

Architectural Coating -

Construction Off-road Equipment Mitigation -

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	20.00	154.00
tblConstructionPhase	NumDays	230.00	195.00
tblConstructionPhase	NumDays	230.00	347.00
tblConstructionPhase	NumDays	230.00	8.00
tblConstructionPhase	NumDays	230.00	36.00
tblConstructionPhase	NumDays	230.00	7.00
tblConstructionPhase	NumDays	230.00	58.00
tblConstructionPhase	NumDays	230.00	45.00
tblConstructionPhase	NumDays	230.00	6.00

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

Exhibit C to Attachment A  
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## EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

tblOffRoadEquipment	UsageHours	7.00	8.00
tblOffRoadEquipment	UsageHours	7.00	4.00
tblOffRoadEquipment	UsageHours	7.00	4.00
tblOffRoadEquipment	UsageHours	7.00	8.00
tblOffRoadEquipment	UsageHours	7.00	4.00
tblOffRoadEquipment	UsageHours	7.00	8.00
tblOffRoadEquipment	UsageHours	7.00	8.00
tblOffRoadEquipment	UsageHours	7.00	8.00
tblOffRoadEquipment	UsageHours	7.00	8.00
tblOffRoadEquipment	UsageHours	7.00	8.00
tblOffRoadEquipment	UsageHours	7.00	8.00
tblTripsAndVMT	HaulingTripNumber	356.00	0.00
tblTripsAndVMT	HaulingTripNumber	1,138.00	0.00
tblTripsAndVMT	VendorTripNumber	39.00	0.00
tblTripsAndVMT	VendorTripNumber	39.00	0.00
tblTripsAndVMT	VendorTripNumber	39.00	0.00
tblTripsAndVMT	VendorTripNumber	39.00	0.00
tblTripsAndVMT	VendorTripNumber	39.00	0.00
tblTripsAndVMT	VendorTripNumber	39.00	0.00
tblTripsAndVMT	VendorTripNumber	39.00	0.00
tblTripsAndVMT	VendorTripNumber	39.00	0.00
tblTripsAndVMT	VendorTripNumber	39.00	0.00
tblTripsAndVMT	VendorTripNumber	39.00	0.00
tblTripsAndVMT	VendorVehicleClass	HDT_Mix	HHDT
tblTripsAndVMT	VendorVehicleClass	HDT_Mix	HHDT
tblTripsAndVMT	VendorVehicleClass	HDT_Mix	HHDT
tblTripsAndVMT	VendorVehicleClass	HDT_Mix	HHDT
tblTripsAndVMT	VendorVehicleClass	HDT_Mix	HHDT
tblTripsAndVMT	WorkerTripNumber	13.00	0.00
tblTripsAndVMT	WorkerTripNumber	163.00	0.00
tblTripsAndVMT	WorkerTripNumber	33.00	0.00
tblTripsAndVMT	WorkerTripNumber	8.00	0.00
tblTripsAndVMT	WorkerTripNumber	163.00	0.00
tblTripsAndVMT	WorkerTripNumber	8.00	0.00
tblTripsAndVMT	WorkerTripNumber	18.00	0.00
tblTripsAndVMT	WorkerTripNumber	163.00	0.00
tblTripsAndVMT	WorkerTripNumber	163.00	0.00
tblTripsAndVMT	WorkerTripNumber	163.00	0.00
tblTripsAndVMT	WorkerTripNumber	163.00	0.00
tblTripsAndVMT	WorkerTripNumber	163.00	0.00
tblTripsAndVMT	WorkerTripNumber	163.00	0.00
tblTripsAndVMT	WorkerTripNumber	163.00	0.00

## 2.0 Emissions Summary

## 2.1 Overall Construction

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					

## Reese Davidson (Venice) - Construction Onsite - South Coast Air Basin, Annual

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

2021						0.0890	0.2689										
2022						0.0889	0.0889										
2023						0.0661	0.0661										
2024						0.0127	0.0127										
Maximum						0.0890	0.2689										

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2021						0.0890	0.1592									
2022						0.0889	0.0889									
2023						0.0661	0.0661									
2024						0.0127	0.0127									
Maximum						0.0890	0.1592									

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	25.15	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
		Highest		

**3.0 Construction Detail**Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	3/1/2021	3/30/2021	5	22	
2	Grading	Grading	4/1/2021	5/31/2021	5	43	
3	Mat Pour - 1A	Building Construction	6/1/2021	6/10/2021	5	8	
4	Foundation - 1A	Building Construction	6/11/2021	7/31/2021	5	36	
5	Mat Pour - 1B	Building Construction	8/1/2021	8/10/2021	5	7	
6	Construction - 1A and Foundation - 1B	Building Construction	8/11/2021	10/31/2021	5	58	
7	Construction - 1A and 1B	Building Construction	11/1/2021	12/31/2021	5	45	
8	Mat Pour - 2	Building Construction	1/1/2022	1/10/2022	5	6	
9	Construction - 1A and 1B and Foundation - 2	Building Construction	1/11/2022	1/31/2022	5	15	
10	Construction - 1A 1B and 2	Building Construction	2/1/2022	10/31/2022	5	195	
11	Architectural Coating	Architectural Coating	7/1/2022	2/1/2023	5	154	
12	Paving Landscape - 1A and 1B	Paving	8/1/2022	11/1/2022	5	67	
13	Construction - 2	Building Construction	11/1/2022	2/28/2024	5	347	
14	Paving Landscape - 2	Paving	1/1/2024	2/28/2024	5	43	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 21.5

Acres of Paving: 3.21

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Residential Indoor: 131,817; Residential Outdoor: 43,939; Non-Residential Indoor: 9,615; Non-Residential Outdoor: 3,205; Striped Parking Area: 8,568

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Air Compressors	1	8.00	78	0.48
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Excavators	0	8.00	158	0.38
Demolition	Generator Sets	0	8.00	84	0.74
Demolition	Other Construction Equipment	1	2.00	172	0.42
Demolition	Rubber Tired Dozers	0	8.00	247	0.40
Demolition	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Grading	Bore/Drill Rigs	1	8.00	221	0.50
Grading	Cranes	1	4.00	231	0.29
Grading	Excavators	1	8.00	158	0.38
Grading	Graders	0	8.00	187	0.41
Grading	Other Construction Equipment	1	2.00	172	0.42
Grading	Pumps	1	8.00	84	0.74
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Mat Pour - 1A	Cranes	1	8.00	231	0.29
Mat Pour - 1A	Forklifts	0	8.00	89	0.20
Mat Pour - 1A	Generator Sets	0	8.00	84	0.74
Mat Pour - 1A	Pumps	4	8.00	84	0.74
Mat Pour - 1A	Tractors/Loaders/Backhoes	0	8.00	97	0.37
Mat Pour - 1A	Welders	0	8.00	46	0.45
Foundation - 1A	Air Compressors	1	8.00	78	0.48
Foundation - 1A	Concrete/Industrial Saws	1	8.00	81	0.73
Foundation - 1A	Cranes	0	4.00	231	0.29
Foundation - 1A	Forklifts	1	8.00	89	0.20
Foundation - 1A	Generator Sets	0	8.00	84	0.74
Foundation - 1A	Pumps	1	8.00	84	0.74
Foundation - 1A	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Foundation - 1A	Welders	1	8.00	46	0.45
Mat Pour - 1B	Cranes	1	8.00	231	0.29
Mat Pour - 1B	Forklifts	0	8.00	89	0.20
Mat Pour - 1B	Generator Sets	0	8.00	84	0.74
Mat Pour - 1B	Pumps	4	8.00	84	0.74
Mat Pour - 1B	Tractors/Loaders/Backhoes	0	8.00	97	0.37
Mat Pour - 1B	Welders	0	8.00	46	0.45
Construction - 1A and Foundation - 1B	Aerial Lifts	1	8.00	63	0.31
Construction - 1A and Foundation - 1B	Air Compressors	1	8.00	78	0.48
Construction - 1A and Foundation - 1B	Concrete/Industrial Saws	1	4.00	81	0.73
Construction - 1A and Foundation - 1B	Cranes	1	4.00	231	0.29
Construction - 1A and Foundation - 1B	Forklifts	1	8.00	89	0.20
Construction - 1A and Foundation - 1B	Generator Sets	0	8.00	84	0.74
Construction - 1A and Foundation - 1B	Pumps	1	8.00	84	0.74
Construction - 1A and Foundation - 1B	Tractors/Loaders/Backhoes	1	7.00	97	0.37
Construction - 1A and Foundation - 1B	Welders	1	8.00	46	0.45
Construction - 1A and 1B	Aerial Lifts	1	8.00	63	0.31
Construction - 1A and 1B	Air Compressors	1	8.00	78	0.48
Construction - 1A and 1B	Concrete/Industrial Saws	1	8.00	81	0.73
Construction - 1A and 1B	Cranes	1	4.00	231	0.29
Construction - 1A and 1B	Forklifts	1	8.00	89	0.20

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Construction - 1A and 1B	Generator Sets	0	8.00	84	0.74
Construction - 1A and 1B	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Construction - 1A and 1B	Welders	1	8.00	46	0.45
Mat Pour - 2	Cranes	1	8.00	231	0.29
Mat Pour - 2	Forklifts	0	8.00	89	0.20
Mat Pour - 2	Generator Sets	0	8.00	84	0.74
Mat Pour - 2	Pumps	4	8.00	84	0.74
Mat Pour - 2	Tractors/Loaders/Backhoes	0	8.00	97	0.37
Mat Pour - 2	Welders	0	8.00	46	0.45
Construction - 1A and 1B and Foundation	Aerial Lifts	1	8.00	63	0.31
Construction - 1A and 1B and Foundation	Air Compressors	1	8.00	78	0.48
Construction - 1A and 1B and Foundation	Concrete/Industrial Saws	1	8.00	81	0.73
Construction - 1A and 1B and Foundation	Cranes	1	4.00	231	0.29
Construction - 1A and 1B and Foundation	Forklifts	1	8.00	89	0.20
Construction - 1A and 1B and Foundation	Generator Sets	0	8.00	84	0.74
Construction - 1A and 1B and Foundation	Pumps	1	8.00	84	0.74
Construction - 1A and 1B and Foundation	Tractors/Loaders/Backhoes	1	7.00	97	0.37
Construction - 1A and 1B and Foundation	Welders	1	8.00	46	0.45
Construction - 1A 1B and 2	Aerial Lifts	1	8.00	63	0.31
Construction - 1A 1B and 2	Air Compressors	1	8.00	78	0.48
Construction - 1A 1B and 2	Concrete/Industrial Saws	1	8.00	81	0.73
Construction - 1A 1B and 2	Cranes	1	4.00	231	0.29
Construction - 1A 1B and 2	Forklifts	1	8.00	89	0.20
Construction - 1A 1B and 2	Generator Sets	0	8.00	84	0.74
Construction - 1A 1B and 2	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Construction - 1A 1B and 2	Welders	1	8.00	46	0.45
Architectural Coating	Air Compressors	1	6.00	78	0.48
Paving Landscape - 1A and 1B	Forklifts	1	8.00	89	0.20
Paving Landscape - 1A and 1B	Pavers	0	8.00	130	0.42
Paving Landscape - 1A and 1B	Paving Equipment	1	8.00	132	0.36
Paving Landscape - 1A and 1B	Plate Compactors	0	8.00	8	0.43
Paving Landscape - 1A and 1B	Rollers	0	8.00	80	0.38
Paving Landscape - 1A and 1B	Skid Steer Loaders	1	8.00	65	0.37
Paving Landscape - 1A and 1B	Trenchers	0	8.00	78	0.50
Construction - 2	Aerial Lifts	1	8.00	63	0.31
Construction - 2	Air Compressors	1	8.00	78	0.48
Construction - 2	Concrete/Industrial Saws	1	8.00	81	0.73
Construction - 2	Cranes	1	4.00	231	0.29
Construction - 2	Forklifts	1	8.00	89	0.20
Construction - 2	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Construction - 2	Welders	1	8.00	46	0.45
Paving Landscape - 2	Forklifts	1	8.00	89	0.20
Paving Landscape - 2	Pavers	0	8.00	130	0.42
Paving Landscape - 2	Paving Equipment	1	8.00	132	0.36
Paving Landscape - 2	Plate Compactors	0	8.00	8	0.43
Paving Landscape - 2	Rollers	0	8.00	80	0.38
Paving Landscape - 2	Skid Steer Loaders	1	8.00	65	0.37
Paving Landscape - 2	Trenchers	0	8.00	78	0.50

## Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	5	0.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT



## Reese Davidson (Venice) - Construction Onsite - South Coast Air Basin, Annual

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

Grading	7	0.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Mat Pour - 1A	5	0.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HHDT	HHDT
Foundation - 1A	6	0.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HHDT	HHDT
Mat Pour - 1B	5	0.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HHDT	HHDT
Construction - 1A and 1B	8	0.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HHDT	HHDT
Construction - 1A and 1B	7	0.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Mat Pour - 2	5	0.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HHDT	HHDT
Construction - 1A and 1B and Foundation - 2	8	0.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HHDT	HHDT
Construction - 1A 1B and 2	7	0.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	0.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving Landscape - 1A and 1B	3	0.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Construction - 2	7	0.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving Landscape - 2	3	0.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

## 3.1 Mitigation Measures Construction

Water Exposed Area

## 3.2 Demolition - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust						0.0000	0.0385									
Off-Road						6.3700e-003	6.3700e-003									
<b>Total</b>						<b>6.3700e-003</b>	<b>0.0449</b>									

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling						0.0000	0.0000									
Vendor						0.0000	0.0000									
Worker						0.0000	0.0000									
<b>Total</b>						<b>0.0000</b>	<b>0.0000</b>									

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust						0.0000	0.0150									

## Reese Davidson (Venice) - Construction Onsite - South Coast Air Basin, Annual

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

Off-Road						6.3700e-003	6.3700e-003										
Total						6.3700e-003	0.0214										

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling						0.0000	0.0000									
Vendor						0.0000	0.0000									
Worker						0.0000	0.0000									
Total						0.0000	0.0000									

## 3.3 Grading - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust						0.0000	0.1414									
Off-Road						0.0252	0.0252									
Total						0.0252	0.1666									

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling						0.0000	0.0000									
Vendor						0.0000	0.0000									
Worker						0.0000	0.0000									
Total						0.0000	0.0000									

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
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## Reese Davidson (Venice) - Construction Onsite - South Coast Air Basin, Annual

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

Category	tons/yr										MT/yr					
Fugitive Dust						0.0000	0.0551									
Off-Road						0.0252	0.0252									
Total						0.0252	0.0804									

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling						0.0000	0.0000									
Vendor						0.0000	0.0000									
Worker						0.0000	0.0000									
Total						0.0000	0.0000									

## 3.4 Mat Pour - 1A - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road						3.6300e-003	3.6300e-003									
Total						3.6300e-003	3.6300e-003									

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling						0.0000	0.0000									
Vendor						0.0000	0.0000									
Worker						0.0000	0.0000									
Total						0.0000	0.0000									

Mitigated Construction On-Site

## Reese Davidson (Venice) - Construction Onsite - South Coast Air Basin, Annual

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road						3.6300e-003	3.6300e-003									
Total						3.6300e-003	3.6300e-003									

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling						0.0000	0.0000									
Vendor						0.0000	0.0000									
Worker						0.0000	0.0000									
Total						0.0000	0.0000									

## 3.5 Foundation - 1A - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road						0.0134	0.0134									
Total						0.0134	0.0134									

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling						0.0000	0.0000									
Vendor						0.0000	0.0000									
Worker						0.0000	0.0000									
Total						0.0000	0.0000									

Mitigated Construction On-Site

## Reese Davidson (Venice) - Construction Onsite - South Coast Air Basin, Annual

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road						0.0134	0.0134									
Total						0.0134	0.0134									

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling						0.0000	0.0000									
Vendor						0.0000	0.0000									
Worker						0.0000	0.0000									
Total						0.0000	0.0000									

## 3.6 Mat Pour - 1B - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road						3.1800e-003	3.1800e-003									
Total						3.1800e-003	3.1800e-003									

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling						0.0000	0.0000									
Vendor						0.0000	0.0000									
Worker						0.0000	0.0000									
Total						0.0000	0.0000									

Mitigated Construction On-Site

## Reese Davidson (Venice) - Construction Onsite - South Coast Air Basin, Annual

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road						3.1800e-003	3.1800e-003									
Total						3.1800e-003	3.1800e-003									

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling						0.0000	0.0000									
Vendor						0.0000	0.0000									
Worker						0.0000	0.0000									
Total						0.0000	0.0000									

## 3.7 Construction - 1A and Foundation - 1B - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road						0.0219	0.0219									
Total						0.0219	0.0219									

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling						0.0000	0.0000									
Vendor						0.0000	0.0000									
Worker						0.0000	0.0000									
Total						0.0000	0.0000									

Mitigated Construction On-Site



## Reese Davidson (Venice) - Construction Onsite - South Coast Air Basin, Annual

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road						0.0219	0.0219									
Total						0.0219	0.0219									

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling						0.0000	0.0000									
Vendor						0.0000	0.0000									
Worker						0.0000	0.0000									
Total						0.0000	0.0000									

## 3.8 Construction - 1A and 1B - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road						0.0153	0.0153									
Total						0.0153	0.0153									

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling						0.0000	0.0000									
Vendor						0.0000	0.0000									
Worker						0.0000	0.0000									
Total						0.0000	0.0000									

Mitigated Construction On-Site

## Reese Davidson (Venice) - Construction Onsite - South Coast Air Basin, Annual

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road						0.0153	0.0153									
Total						0.0153	0.0153									

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling						0.0000	0.0000									
Vendor						0.0000	0.0000									
Worker						0.0000	0.0000									
Total						0.0000	0.0000									

## 3.9 Mat Pour - 2 - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road						2.3900e-003	2.3900e-003									
Total						2.3900e-003	2.3900e-003									

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling						0.0000	0.0000									
Vendor						0.0000	0.0000									
Worker						0.0000	0.0000									
Total						0.0000	0.0000									

Mitigated Construction On-Site

## Reese Davidson (Venice) - Construction Onsite - South Coast Air Basin, Annual

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road						2.3900e-003	2.3900e-003									
Total						2.3900e-003	2.3900e-003									

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling						0.0000	0.0000									
Vendor						0.0000	0.0000									
Worker						0.0000	0.0000									
Total						0.0000	0.0000									

## 3.10 Construction - 1A and 1B and Foundation - 2 - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road						5.4400e-003	5.4400e-003									
Total						5.4400e-003	5.4400e-003									

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling						0.0000	0.0000									
Vendor						0.0000	0.0000									
Worker						0.0000	0.0000									
Total						0.0000	0.0000									

Mitigated Construction On-Site

## Reese Davidson (Venice) - Construction Onsite - South Coast Air Basin, Annual

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road						5.4400e-003	5.4400e-003									
Total						5.4400e-003	5.4400e-003									

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling						0.0000	0.0000									
Vendor						0.0000	0.0000									
Worker						0.0000	0.0000									
Total						0.0000	0.0000									

## 3.11 Construction - 1A 1B and 2 - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road						0.0566	0.0566									
Total						0.0566	0.0566									

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling						0.0000	0.0000									
Vendor						0.0000	0.0000									
Worker						0.0000	0.0000									
Total						0.0000	0.0000									

Mitigated Construction On-Site

## Reese Davidson (Venice) - Construction Onsite - South Coast Air Basin, Annual

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road						0.0566	0.0566									
Total						0.0566	0.0566									

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling						0.0000	0.0000									
Vendor						0.0000	0.0000									
Worker						0.0000	0.0000									
Total						0.0000	0.0000									

## 3.12 Architectural Coating - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating						0.0000	0.0000									
Off-Road						5.3500e-003	5.3500e-003									
Total						5.3500e-003	5.3500e-003									

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling						0.0000	0.0000									
Vendor						0.0000	0.0000									
Worker						0.0000	0.0000									
Total						0.0000	0.0000									

Mitigated Construction On-Site

## Reese Davidson (Venice) - Construction Onsite - South Coast Air Basin, Annual

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating						0.0000	0.0000									
Off-Road						5.3500e-003	5.3500e-003									
<b>Total</b>						5.3500e-003	5.3500e-003									

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling						0.0000	0.0000									
Vendor						0.0000	0.0000									
Worker						0.0000	0.0000									
<b>Total</b>						0.0000	0.0000									

## 3.12 Architectural Coating - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating						0.0000	0.0000									
Off-Road						8.1000e-004	8.1000e-004									
<b>Total</b>						8.1000e-004	8.1000e-004									

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling						0.0000	0.0000									
Vendor						0.0000	0.0000									
Worker						0.0000	0.0000									
<b>Total</b>						0.0000	0.0000									



## Reese Davidson (Venice) - Construction Onsite - South Coast Air Basin, Annual

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

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating						0.0000	0.0000									
Off-Road						8.1000e-004	8.1000e-004									
<b>Total</b>						<b>8.1000e-004</b>	<b>8.1000e-004</b>									

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling						0.0000	0.0000									
Vendor						0.0000	0.0000									
Worker						0.0000	0.0000									
<b>Total</b>						<b>0.0000</b>	<b>0.0000</b>									

## 3.13 Paving Landscape - 1A and 1B - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road						6.3400e-003	6.3400e-003									
Paving						0.0000	0.0000									
<b>Total</b>						<b>6.3400e-003</b>	<b>6.3400e-003</b>									

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling						0.0000	0.0000									
Vendor						0.0000	0.0000									
Worker						0.0000	0.0000									

## Reese Davidson (Venice) - Construction Onsite - South Coast Air Basin, Annual

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

Total						0.0000	0.0000										
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Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road						6.3400e-003	6.3400e-003									
Paving						0.0000	0.0000									
Total						6.3400e-003	6.3400e-003									

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling						0.0000	0.0000									
Vendor						0.0000	0.0000									
Worker						0.0000	0.0000									
Total						0.0000	0.0000									

## 3.14 Construction - 2 - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road						0.0128	0.0128									
Total						0.0128	0.0128									

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling						0.0000	0.0000									
Vendor						0.0000	0.0000									

## Reese Davidson (Venice) - Construction Onsite - South Coast Air Basin, Annual

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

Worker						0.0000	0.0000										
Total						0.0000	0.0000										

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road						0.0128	0.0128									
Total						0.0128	0.0128									

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling						0.0000	0.0000									
Vendor						0.0000	0.0000									
Worker						0.0000	0.0000									
Total						0.0000	0.0000									

## 3.14 Construction - 2 - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road						0.0652	0.0652									
Total						0.0652	0.0652									

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling						0.0000	0.0000									
Vendor						0.0000	0.0000									

## Reese Davidson (Venice) - Construction Onsite - South Coast Air Basin, Annual

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

Worker						0.0000	0.0000										
Total						0.0000	0.0000										

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road						0.0652	0.0652									
Total						0.0652	0.0652									

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling						0.0000	0.0000									
Vendor						0.0000	0.0000									
Worker						0.0000	0.0000									
Total						0.0000	0.0000									

## 3.14 Construction - 2 - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road						9.4300e-003	9.4300e-003									
Total						9.4300e-003	9.4300e-003									

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling						0.0000	0.0000									
Vendor						0.0000	0.0000									

## Reese Davidson (Venice) - Construction Onsite - South Coast Air Basin, Annual

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

Worker						0.0000	0.0000										
Total						0.0000	0.0000										

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road						9.4300e-003	9.4300e-003									
Total						9.4300e-003	9.4300e-003									

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling						0.0000	0.0000									
Vendor						0.0000	0.0000									
Worker						0.0000	0.0000									
Total						0.0000	0.0000									

## 3.15 Paving Landscape - 2 - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road						3.2200e-003	3.2200e-003									
Paving						0.0000	0.0000									
Total						3.2200e-003	3.2200e-003									

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling						0.0000	0.0000									

## Reese Davidson (Venice) - Construction Onsite - South Coast Air Basin, Annual

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

Vendor						0.0000	0.0000										
Worker						0.0000	0.0000										
Total						0.0000	0.0000										

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road						3.2200e-003	3.2200e-003									
Paving						0.0000	0.0000									
Total						3.2200e-003	3.2200e-003									

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling						0.0000	0.0000									
Vendor						0.0000	0.0000									
Worker						0.0000	0.0000									
Total						0.0000	0.0000									



## Reese Davidson Community Project-Health Risk Assessment

### Diesel Particulate Matter Emissions

#### Summary of Emissions by Year (CalEEMod Output)

Year	Exhaust PM10			Avg Day/Peak Day Scalar <sup>b</sup>	g/s <sup>c</sup>
	tons/yr	lbs/yr	lbs/day <sup>a</sup>		
2021	0.0890	178	0.4877	0.8	0.0061
2022	0.0889	177.8	0.4871	0.8	0.0061
2023	0.0661	132.2	0.3622	0.8	0.0046
2024	0.0127	25.4	0.0696	0.8	0.0009
Total	0.2567				
36-month Annual Average <sup>d</sup>		171.1	0.4689	0.8	0.0059

<sup>a</sup> Based on 365 days per year

<sup>b</sup> CalEEMod annual emissions are based on peak-day activity. Calculations assume that annual emissions would be equivalent to 80% of peak day emissions.

<sup>c</sup> Based on 8-hours per day of construction activity

<sup>d</sup> Construction would start in 2021 and end 2023 for a total of 28 months

## Reese Davidson Community Project-Health Risk Assessment

### Operational HRA - On-site Truck Emissions

#### Diesel Particulate Emission Factors - T7 Single Truck (EMFAC2014 - Year 2025)

Speed	g/mi	
5	0.0098	Idle emission factor
15	0.0067	On-site travel emission factor. T8 Tractor

#### Emissions Calculations (Loading Docks)

Land Use	TSF	Truck Trips/TSF	Truck Trips
Multi-Family (140)	68.0	0.011	0.7
Retail/Restaurant	4.57	0.324	1.5
Total	72.535		2.2

National Cooperative Highway Research Program (NCHRP) Synthesis 298 Truck Trip Generation Data, 2001, [http://onlinepubs.trb.org/onlinepubs/nchrp/nchrp\\_syn\\_298.pdf](http://onlinepubs.trb.org/onlinepubs/nchrp/nchrp_syn_298.pdf).

Parameter	Value	
Average Trucks per Day	2.2	
Days per Year	312	6 days per week
Trucks per Year	695	
Idle time per Truck (min)	15	5 minutes x 3 (enter, loading, exit)
Idle time per Truck (hrs)	0.25	
Idle time per year (hrs)	174	
Idle Emission Factor (g/hr)	0.0098	
Idle emissions per year (g)	1.71	
Annual Idle emission rate (g/s)	1.63E-07	8-hour operation

#### Transportation Refrigeration Unit (TRU)

Emission Rate (g/hr)	0.455	See TRU Emission Factor Calculation
TRU Operation Time per Truck (hrs)	2	Duration of time at loading dock
Daily Number of Trucks with TRU	0.15	10 percent of retail
Total Annual TRU Hours	94	6 days per week operation
Total Annual TRU Emissions (g)	42.7	
Annual TRU Emission Rate (g/s)	4.06E-06	8-hour operation
Total Emission Rate (g/s)	4.22E-06	AERMOD Input - Idle + Travel + TRU

Source: EMFAC2021 (v1.0.1) Emission Rates

Region Type: Air Basin

Region: South Coast

Calendar Year: 2025

Season: Annual

Vehicle Classification: EMFAC202x Categories

Units: miles/day for CVMT and EVMT, g/mile for RUNEX, PMBW and PMTW, mph for Speed

Region	Calendar Year	Vehicle Category	Model Year	Speed	Fuel	PM2.5_RUNEX	PM10_RUNEX
South Coast	2025	T7 Tractor Class 8	Aggregate		5 Diesel	0.009	0.010
South Coast	2025	T7 Tractor Class 8	Aggregate		15 Diesel	0.006	0.007

## Appendix B

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# Carcinogenic and Non-Carcinogenic Risk Calculations



## Reese Davidson Community Project-Health Risk Assessment

### Cancer Risk Calculations

#### Diesel Particulate Matter Emission Rate Calculation / Scaler

	Year -->	2021-2024	2024-2091
Average Annual Emission Rate (g/s) <sup>a</sup>		0.006	3.4E-06
Scaler Concentration (ug/m3) <sup>b</sup>		52.10	12.86
Diesel Particulate Concentration (ug/m3)		0.308	4.4E-05

#### Cancer Risk Calculations - DPM

Parameter	2021-2024	2024-2091	Total
Breathing Rate	393	393	
Exposure Frequency (EF)	350	350	
Exposure Duration (ED) (years)	3.00	67.00	70
AT	25550	25550	
Age Sensitivity Factor (ASF)	1	1	
Fraction of Time at Home (FAH)	1	1	
70-Year (Lifetime) Concentration (ug/m3)	3.08E-01	4.41E-05	
70-Year (Lifetime) Dose (mg/kg-d)	1.16E-04	1.66E-08	
Carcinogen Potency (CPF) (mg/kg-d) <sup>-1</sup>			
- Diesel Particulate Matter	1.1	1.1	
Cancer Risk	5.47E-06	1.75E-08	5.48E-06
Risk per Million (DPM)	5.48		

<sup>a</sup> Emissions based on a 36-month average

<sup>b</sup> Scaler concentration based on an AERMOD emission rate of 1 g/s, 8-hours per day

#### Chronic Risk Calculations - DPM

Receptor	Annual Concentration (ug/m3)	Chronic Inhalation REL (ug/m3)	Chronic Risk (HI)
Residential	3.1E-01	5	6.2E-02

## Appendix B

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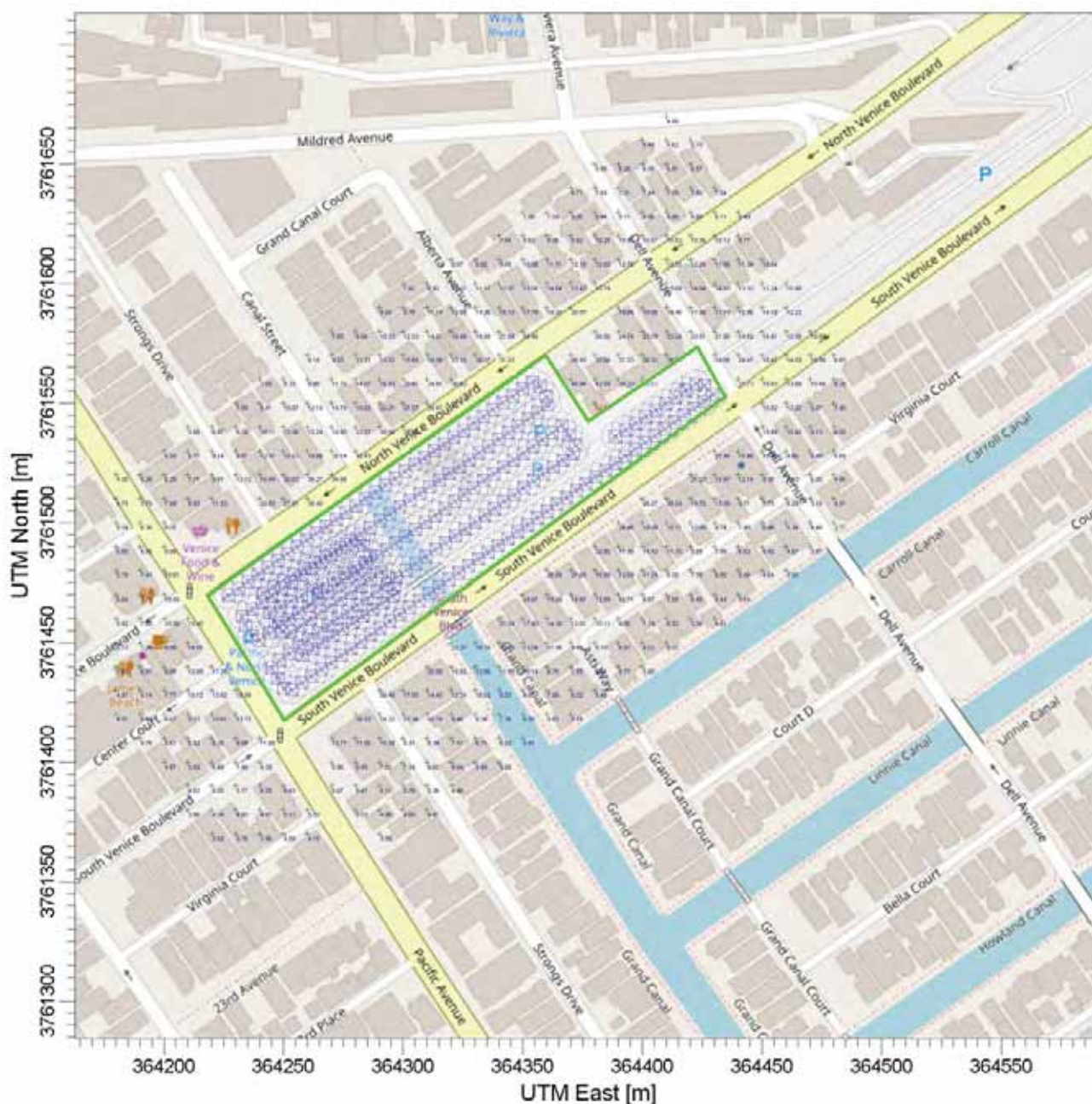
# Carcinogenic and Non-Carcinogenic Risk Calculations





PROJECT TITLE:

C:\AERMOD\Venice\Venice.isc



COMMENTS:

Reese Davidson  
Health Risk Assessment  
Construction

SOURCES:

**2**

COMPANY NAME:

RECEPTORS:

**399**

MODELER:

OUTPUT TYPE:

**Concentration**

SCALE:

1:2,698

0  0.1 km

MAX:

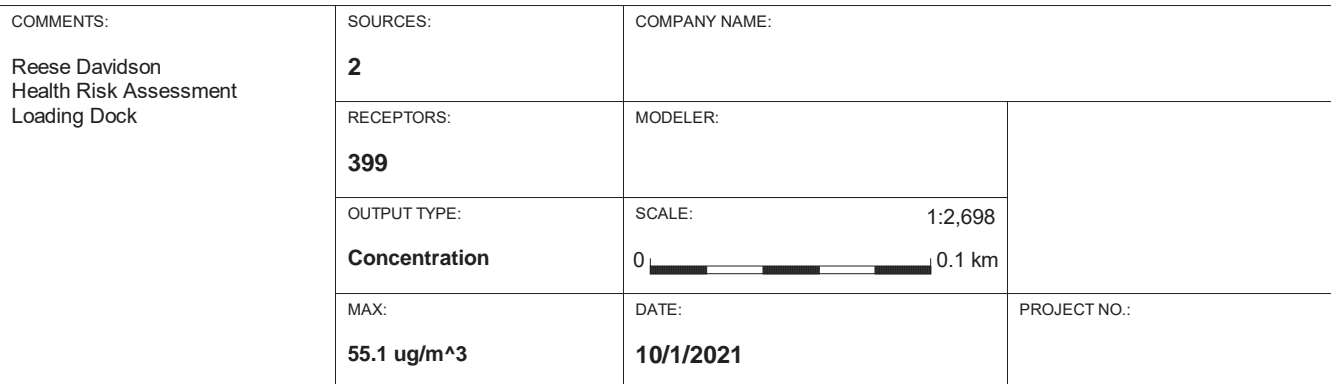
**52.1 ug/m^3**

DATE:

**10/1/2021**

PROJECT NO.:

C:\AERMOD\Venice\Venice.isc





\*\* Lakes Environmental AERMOD MPI  
\*\*  
\*\*\*\*\*  
\*\*  
\*\* AERMOD Input Produced by:  
\*\* AERMOD View Ver. 10.0.1  
\*\* Lakes Environmental Software Inc.  
\*\* Date: 10/1/2021  
\*\* File: C:\AERMOD\Venice\Venice.ADI  
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\*\*\*\*\*  
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\*\*\*\*\*  
\*\* AERMOD Control Pathway  
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MODELOPT DEFAULT CONC  
AVERTIME PERIOD  
URBANOPT 9818605 Los\_Angeles\_County  
POLLUTID DPM  
RUMORNOT RUN  
ERRORFIL Venice.err  
CO FINISHED  
\*\*  
\*\*\*\*\*  
\*\* AERMOD Source Pathway  
\*\*\*\*\*  
\*\*  
\*\*  
SO STARTING  
\*\* Source Location \*\*  
\*\* Source ID - Type - X Coord. - Y Coord. \*\*  
\*\* -----  
\*\* Line Source Represented by Adjacent Volume Sources  
\*\* LINE VOLUME Source ID = CONST  
\*\* DESCSRSC Construction DPM  
\*\* PREFIX  
\*\* Length of Side = 5.00  
\*\* Configuration = Adjacent  
\*\* Emission Rate = 1.0  
\*\* Elevated  
\*\* Vertical Dimension = 5.00  
\*\* SZINIT = 1.16  
\*\* Nodes = 12  
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\*\* 364355.473, 3761559.777, 1.99, 3.66, 2.33  
\*\* 364361.645, 3761549.760, 2.19, 3.66, 2.33  
\*\* 364231.924, 3761460.653, 4.57, 3.66, 2.33  
\*\* 364238.588, 3761450.144, 4.64, 3.66, 2.33  
\*\* 364366.419, 3761540.566, 2.19, 3.66, 2.33  
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\*\* 364387.153, 3761534.936, 2.35, 3.66, 2.33  
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LOCATION L0004326 VOLUME 364259.807 3761492.733 3.14  
LOCATION L0004327 VOLUME 364263.902 3761495.603 3.00  
LOCATION L0004328 VOLUME 364267.997 3761498.472 2.86  
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LOCATION L0004330 VOLUME 364276.186 3761504.211 2.57  
LOCATION L0004331 VOLUME 364280.280 3761507.081 2.43  
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LOCATION L0004360 VOLUME 364327.509 3761526.311 2.19  
LOCATION L0004361 VOLUME 364323.387 3761523.480 2.22  
LOCATION L0004362 VOLUME 364319.266 3761520.649 2.24  
LOCATION L0004363 VOLUME 364315.145 3761517.818 2.27  
LOCATION L0004364 VOLUME 364311.023 3761514.987 2.30  
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LOCATION L0004367 VOLUME 364298.659 3761506.494 2.24  
LOCATION L0004368 VOLUME 364294.538 3761503.663 2.26  
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\*\* PREFIX  
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\*\* Source Parameters \*\*  
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SO FINISHED

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\*\* AERMOD Receptor Pathway  
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RE STARTING  
INCLUDED Venice.rou  
RE FINISHED  
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\*\* AERMOD Meteorology Pathway  
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SURFILE MetKSMO\_v9.SFC  
PROFILE MetKSMO\_v9.PFL  
SURF DATA 93197 2012  
UAI RDATA 3190 2012  
PROFBASE 53.0 METERS  
ME FINISHED  
\*\*  
\*\*\*\*\*  
\*\* AERMOD Output Pathway  
\*\*\*\*\*  
\*\*  
\*\*  
OU STARTING  
\*\* Auto-Generated Plottiles  
PLOTFILE PERIOD CONST Venice.ADIPE00G001.PLT 31  
PLOTFILE PERIOD LOADING Venice.ADIPE00G002.PLT 32  
SUMFILE Venice.sum  
OU FINISHED  
\*\*\* Message Summary For AERMOD Model Setup \*\*\*  
----- Summary of Total Messages -----  
A Total of 0 Fatal Error Message(s)  
A Total of 2 Warning Message(s)  
A Total of 0 Informational Message(s)  
\*\*\*\*\* FATAL ERROR MESSAGES \*\*\*\*\*  
\*\*\* NONE \*\*\*  
\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*  
ME W186 1571 MEOPEN: THRESH\_1MIN 1-min ASOS wind speed threshold used 0.50  
ME W187 1571 MEOPEN: ADJ\_U\* Option for Stable Low Winds used in AERMET  
\*\*\*\*\*  
\*\*\* SETUP Finishes Successfully \*\*\*  
\*\*\*\*\*  
\*\*  
\*\*\* AERMOD - VERSION 21112 \*\*\* \*\* C:\AERMOD\Venice\isc  
\*\*\* AERMET - VERSION 16216 \*\*\* \*\*  
\*\*\* MODELOPTs: RegDFAULT CONC ELEV URBAN ADJ\_U\*  
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\*\*\* 13:24:08 \*\*\*  
10/01/21

\*\*\* MODEL SETUP OPTIONS SUMMARY \*\*\*

\*\*Model Is Setup For Calculation of Average CONCentration Values.

-- DEPOSITION LOGIC --

\*\*NO GAS DEPOSITION Data Provided.

\*\*NO PARTICLE DEPOSITION Data Provided.

\*\*Model Uses NO DRY DEPLETION. DRYDPLT = F

\*\*Model Uses NO WET DEPLETION. WETDPLT = F

\*\*Model Uses URBAN Dispersion Algorithm for the SBL for 236 Source(s),  
for Total of 1 Urban Area(s):  
Urban Population = 9818605.0 ; Urban Roughness Length = 1,000 m

\*\*Model Uses Regulatory DEFAULT Options:

1. Stack-tip Downwash.
2. Model Accounts for ELEVated Terrain Effects.
3. Use Calms Processing Routine.
4. Use Missing Data Processing Routine.
5. No Exponential Decay.
6. Urban Roughness Length of 1.0 Meter Assumed.

\*\*Other Options Specified:

ADJ\_U\* - Use ADJ\_U\* option for SBL in AERMET  
CCVR\_Sub - Meteorological data includes CCVR substitutions  
TEMP\_Sub - Meteorological data includes TEMP substitutions

\*\*Model Assumes No FLAGPOLE Receptor Heights.

\*\*The User Specified a Pollutant Type of: DPM

\*\*Model Calculates PERIOD Averages Only

\*\*This Run Includes: 236 Source(s); 2 Source Group(s); and 399 Receptor(s)

with: 0 POINT(s) including  
0 POINTCAP(s) and 0 POINTHOR(s)  
and: 236 VOLUME source(s)  
and: 0 AREA type source(s)  
and: 0 LINE source(s)  
and: 0 RLINERUNEXT source(s)  
and: 0 OPENPIT source(s)  
and: 0 BUOYANT LINE source(s) with a total of 0 line(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 PERIOD 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) = 53.00 ; Rot. Angle = 0.0  
Emission Units = GRAMS/SEC  
Output Units = MICROGRAMS/M\*\*3  
; Emission Rate Unit Factor = 0.10000E+07

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

\*\*Input RunStream File: aermod.inp

\*\*Output Print File: aermod.out

\*\*Detailed Error/Message File: Venice.err

\*\*File for Summary of Results: Venice.sum

\*\*\* AERMOT - VERSION 21112 \*\*\* \*\* C:\AERMOD\Venice\Venice.isc

\*\*\* AERMET - VERSION 16216 \*\*\*

\*\*\* MODELOPTs: RegDEFAULT CONC ELEV URBAN ADJ\_U\*

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\*\*\* VOLUME SOURCE DATA \*\*\*

NUMBER EMISSION RATE		BASE RELEASE		INIT.		URBAN EMISSION RATE	
SOURCE	PART. (GRAMS/SEC)	X	Y	ELEV. HEIGHT	SY	SZ	SCALAR VARY
ID	CATS.	(METERS)	(METERS)	(METERS)	(METERS)	(METERS)	BY
-----							
L0004318	0	0.52632E-02	364227.1	3761469.8	4.3	3.66	2.33 1.16 YES HROFDY
L0004319	0	0.52632E-02	364231.1	3761472.6	4.2	3.66	2.33 1.16 YES HROFDY
L0004320	0	0.52632E-02	364235.2	3761475.5	4.0	3.66	2.33 1.16 YES HROFDY
L0004321	0	0.52632E-02	364239.3	3761478.4	3.9	3.66	2.33 1.16 YES HROFDY
L0004322	0	0.52632E-02	364243.4	3761481.3	3.7	3.66	2.33 1.16 YES HROFDY
L0004323	0	0.52632E-02	364247.5	3761484.1	3.6	3.66	2.33 1.16 YES HROFDY
L0004324	0	0.52632E-02	364251.6	3761487.0	3.4	3.66	2.33 1.16 YES HROFDY
L0004325	0	0.52632E-02	364255.7	3761489.9	3.3	3.66	2.33 1.16 YES HROFDY
L0004326	0	0.52632E-02	364259.8	3761492.7	3.1	3.66	2.33 1.16 YES HROFDY
L0004327	0	0.52632E-02	364263.9	3761495.6	3.0	3.66	2.33 1.16 YES HROFDY
L0004328	0	0.52632E-02	364268.0	3761498.5	2.9	3.66	2.33 1.16 YES HROFDY
L0004329	0	0.52632E-02	364272.1	3761501.3	2.7	3.66	2.33 1.16 YES HROFDY
L0004330	0	0.52632E-02	364276.2	3761504.2	2.6	3.66	2.33 1.16 YES HROFDY
L0004331	0	0.52632E-02	364280.3	3761507.1	2.4	3.66	2.33 1.16 YES HROFDY
L0004332	0	0.52632E-02	364284.4	3761510.0	2.3	3.66	2.33 1.16 YES HROFDY
L0004333	0	0.52632E-02	364288.5	3761512.8	2.3	3.66	2.33 1.16 YES HROFDY
L0004334	0	0.52632E-02	364292.6	3761515.7	2.3	3.66	2.33 1.16 YES HROFDY
L0004335	0	0.52632E-02	364296.7	3761518.6	2.3	3.66	2.33 1.16 YES HROFDY
L0004336	0	0.52632E-02	364300.8	3761521.4	2.2	3.66	2.33 1.16 YES HROFDY
L0004337	0	0.52632E-02	364304.8	3761524.3	2.2	3.66	2.33 1.16 YES HROFDY
L0004338	0	0.52632E-02	364308.9	3761527.2	2.1	3.66	2.33 1.16 YES HROFDY
L0004339	0	0.52632E-02	364313.0	3761530.0	2.1	3.66	2.33 1.16 YES HROFDY
L0004340	0	0.52632E-02	364317.1	3761532.9	2.1	3.66	2.33 1.16 YES HROFDY
L0004341	0	0.52632E-02	364321.2	3761535.8	2.0	3.66	2.33 1.16 YES HROFDY
L0004342	0	0.52632E-02	364325.3	3761538.6	2.0	3.66	2.33 1.16 YES HROFDY
L0004343	0	0.52632E-02	364329.4	3761541.5	2.0	3.66	2.33 1.16 YES HROFDY
L0004344	0	0.52632E-02	364333.5	3761544.4	2.0	3.66	2.33 1.16 YES HROFDY
L0004345	0	0.52632E-02	364337.6	3761547.3	2.0	3.66	2.33 1.16 YES HROFDY
L0004346	0	0.52632E-02	364341.7	3761550.1	2.0	3.66	2.33 1.16 YES HROFDY
L0004347	0	0.52632E-02	364345.8	3761553.0	2.0	3.66	2.33 1.16 YES HROFDY
L0004348	0	0.52632E-02	364349.9	3761555.9	2.0	3.66	2.33 1.16 YES HROFDY
L0004349	0	0.52632E-02	364354.0	3761558.7	2.0	3.66	2.33 1.16 YES HROFDY
L0004350	0	0.52632E-02	364357.1	3761557.1	2.0	3.66	2.33 1.16 YES HROFDY
L0004351	0	0.52632E-02	364359.8	3761552.8	2.1	3.66	2.33 1.16 YES HROFDY
L0004352	0	0.52632E-02	364360.5	3761549.0	2.1	3.66	2.33 1.16 YES HROFDY
L0004353	0	0.52632E-02	364356.4	3761546.1	2.1	3.66	2.33 1.16 YES HROFDY
L0004354	0	0.52632E-02	364352.2	3761543.3	2.1	3.66	2.33 1.16 YES HROFDY
L0004355	0	0.52632E-02	364348.1	3761540.5	2.1	3.66	2.33 1.16 YES HROFDY
L0004356	0	0.52632E-02	364344.0	3761537.6	2.1	3.66	2.33 1.16 YES HROFDY
L0004357	0	0.52632E-02	364339.9	3761534.8	2.1	3.66	2.33 1.16 YES HROFDY
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L0002781 0 0.21739E-01 364293.8 3761477.2 2.4 3.66 2.33 1.16 YES HROFDY \*\*\*  
L0002782 0 0.21739E-01 364296.3 3761472.9 2.5 3.66 2.33 1.16 YES HROFDY \*\*\*  
L0002783 0 0.21739E-01 364295.6 3761469.3 2.7 3.66 2.33 1.16 YES HROFDY \*\*\*  
L0002784 0 0.21739E-01 364291.4 3761466.6 3.0 3.66 2.33 1.16 YES HROFDY \*\*\*  
L0002785 0 0.21739E-01 364287.2 3761463.9 3.2 3.66 2.33 1.16 YES HROFDY \*\*\*  
L0002786 0 0.21739E-01 364283.0 3761461.1 3.5 3.66 2.33 1.16 YES HROFDY \*\*\*  
L0002787 0 0.21739E-01 364278.9 3761458.4 3.6 3.66 2.33 1.16 YES HROFDY \*\*\*  
L0002788 0 0.21739E-01 364274.7 3761455.7 3.8 3.66 2.33 1.16 YES HROFDY \*\*\*  
L0002789 0 0.21739E-01 364270.5 3761453.0 4.0 3.66 2.33 1.16 YES HROFDY \*\*\*  
L0002790 0 0.21739E-01 364266.3 3761450.2 4.1 3.66 2.33 1.16 YES HROFDY \*\*\*  
L0002791 0 0.21739E-01 364262.1 3761447.5 4.2 3.66 2.33 1.16 YES HROFDY \*\*\*  
L0002792 0 0.21739E-01 364257.9 3761444.8 4.3 3.66 2.33 1.16 YES HROFDY \*\*\*  
\*\*\*\* AERMOD - VERSION 21112 \*\*\* \*\* C:VAERMOD\Venice\Venice.lsc  
\*\*\* AERMET - VERSION 16216 \*\*\* \*\* 13:24:08

\*\*\* MODELPTS: RegDFault CONC ELEV URBAN ADJ\_U\* 10/01/21

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\*\*\* SOURCE IDs DEFINING SOURCE GROUPS \*\*\*

SRCGROUP ID	SOURCE IDs
-----	-----
CONST L0004318 , L0004319 , L0004320 , L0004321 , L0004322 , L0004323 , L0004324 , L0004325 ,	
L0004326 , L0004327 , L0004328 , L0004329 , L0004330 , L0004331 , L0004332 , L0004333 ,	
L0004334 , L0004335 , L0004336 , L0004337 , L0004338 , L0004339 , L0004340 , L0004341 ,	
L0004342 , L0004343 , L0004344 , L0004345 , L0004346 , L0004347 , L0004348 , L0004349 ,	
L0004350 , L0004351 , L0004352 , L0004353 , L0004354 , L0004355 , L0004356 , L0004357 ,	
L0004358 , L0004359 , L0004360 , L0004361 , L0004362 , L0004363 , L0004364 , L0004365 ,	
L0004366 , L0004367 , L0004368 , L0004369 , L0004370 , L0004371 , L0004372 , L0004373 ,	
L0004374 , L0004375 , L0004376 , L0004377 , L0004378 , L0004379 , L0004380 , L0004381 ,	
L0004382 , L0004383 , L0004384 , L0004385 , L0004386 , L0004387 , L0004388 , L0004389 ,	
L0004390 , L0004391 , L0004392 , L0004393 , L0004394 , L0004395 , L0004396 , L0004397 ,	
L0004398 , L0004399 , L0004400 , L0004401 , L0004402 , L0004403 , L0004404 , L0004405 ,	
L0004406 , L0004407 , L0004408 , L0004409 , L0004410 , L0004411 , L0004412 , L0004413 ,	
L0004414 , L0004415 , L0004416 , L0004417 , L0004418 , L0004419 , L0004420 , L0004421 ,	
L0004422 , L0004423 , L0004424 , L0004425 , L0004426 , L0004427 , L0004428 , L0004429 ,	
L0004430 , L0004431 , L0004432 , L0004433 , L0004434 , L0004435 , L0004436 , L0004437 ,	
L0004438 , L0004439 , L0004440 , L0004441 , L0004442 , L0004443 , L0004444 , L0004445 ,	
L0004446 , L0004447 , L0004448 , L0004449 , L0004450 , L0004451 , L0004452 , L0004453 ,	
L0004454 , L0004455 , L0004456 , L0004457 , L0004458 , L0004459 , L0004460 , L0004461 ,	
L0004462 , L0004463 , L0004464 , L0004465 , L0004466 , L0004467 , L0004468 , L0004469 ,	

L0004470 , L0004471 , L0004472 , L0004473 , L0004474 , L0004475 , L0004476 , L0004477 ,  
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\*\*\* MODELPTS: RegDFault CONC ELEV URBAN ADJ\_U\*

\*\*\* SOURCE IDs DEFINING SOURCE GROUPS \*\*\*

SRCGROUP ID	SOURCE IDs
-----	-----
L0004478 , L0004479 , L0004480 , L0004481 , L0004482 , L0004483 , L0004484 , L0004485 ,	
L0004486 , L0004487 , L0004488 , L0004489 , L0004490 , L0004491 , L0004492 , L0004493 ,	
L0004494 , L0004495 , L0004496 , L0004497 , L0004498 , L0004499 , L0004500 , L0004501 ,	
L0004502 , L0004503 , L0004504 , L0004505 , L0004506 , L0004507 ,	

LOADING L0002747 , L0002748 , L0002749 , L0002750 , L0002751 , L0002752 , L0002753 , L0002754 ,

L0002755 , L0002756 , L0002757 , L0002758 , L0002759 , L0002760 , L0002761 , L0002762 ,  
L0002763 , L0002764 , L0002765 , L0002766 , L0002767 , L0002768 , L0002769 , L0002770 ,  
L0002771 , L0002772 , L0002773 , L0002774 , L0002775 , L0002776 , L0002777 , L0002778 ,  
L0002779 , L0002780 , L0002781 , L0002782 , L0002783 , L0002784 , L0002785 , L0002786 ,  
L0002787 , L0002788 , L0002789 , L0002790 , L0002791 , L0002792 ,  
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\*\*\* MODELPTS: RegDFault CONC ELEV URBAN ADJ\_U\*

\*\*\* SOURCE IDs DEFINED AS URBAN SOURCES \*\*\*

URBAN ID	URBAN POP	SOURCE IDs
-----	-----	-----
9818605 , L0004318 , L0004319 , L0004320 , L0004321 , L0004322 , L0004323 , L0004324 , L0004325 ,		
L0004326 , L0004327 , L0004328 , L0004329 , L0004330 , L0004331 , L0004332 , L0004333 ,		
L0004334 , L0004335 , L0004336 , L0004337 , L0004338 , L0004339 , L0004340 , L0004341 ,		
L0004342 , L0004343 , L0004344 , L0004345 , L0004346 , L0004347 , L0004348 , L0004349 ,		
L0004350 , L0004351 , L0004352 , L0004353 , L0004354 , L0004355 , L0004356 , L0004357 ,		
L0004358 , L0004359 , L0004360 , L0004361 , L0004362 , L0004363 , L0004364 , L0004365 ,		
L0004366 , L0004367 , L0004368 , L0004369 , L0004370 , L0004371 , L0004372 , L0004373 ,		
L0004374 , L0004375 , L0004376 , L0004377 , L0004378 , L0004379 , L0004380 , L0004381 ,		
L0004382 , L0004383 , L0004384 , L0004385 , L0004386 , L0004387 , L0004388 , L0004389 ,		

L0004390 , L0004391 , L0004392 , L0004393 , L0004394 , L0004395 , L0004396 , L0004397 ,  
L0004398 , L0004399 , L0004400 , L0004401 , L0004402 , L0004403 , L0004404 , L0004405 ,  
L0004406 , L0004407 , L0004408 , L0004409 , L0004410 , L0004411 , L0004412 , L0004413 ,  
L0004414 , L0004415 , L0004416 , L0004417 , L0004418 , L0004419 , L0004420 , L0004421 ,  
L0004422 , L0004423 , L0004424 , L0004425 , L0004426 , L0004427 , L0004428 , L0004429 ,  
L0004430 , L0004431 , L0004432 , L0004433 , L0004434 , L0004435 , L0004436 , L0004437 ,  
L0004438 , L0004439 , L0004440 , L0004441 , L0004442 , L0004443 , L0004444 , L0004445 ,  
L0004446 , L0004447 , L0004448 , L0004449 , L0004450 , L0004451 , L0004452 , L0004453 ,  
L0004454 , L0004455 , L0004456 , L0004457 , L0004458 , L0004459 , L0004460 , L0004461 ,  
L0004462 , L0004463 , L0004464 , L0004465 , L0004466 , L0004467 , L0004468 , L0004469 ,  
L0004470 , L0004471 , L0004472 , L0004473 , L0004474 , L0004475 , L0004476 , L0004477 ,  
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\*\*\* MODELOPTS: RegDEFAULT CONC ELEV URBAN ADJ\_U\*

\*\*\* SOURCE IDs DEFINED AS URBAN SOURCES \*\*\*

URBAN ID URBAN POP SOURCE IDS  
-----

L0004478 , L0004479 , L0004480 , L0004481 , L0004482 , L0004483 , L0004484 , L0004485 ,  
L0004486 , L0004487 , L0004488 , L0004489 , L0004490 , L0004491 , L0004492 , L0004493 ,  
L0004494 , L0004495 , L0004496 , L0004497 , L0004498 , L0004499 , L0004500 , L0004501 ,  
L0004502 , L0004503 , L0004504 , L0004505 , L0004506 , L0004507 , L0002747 , L0002748 ,  
L0002749 , L0002750 , L0002751 , L0002752 , L0002753 , L0002754 , L0002755 , L0002756 ,  
L0002757 , L0002758 , L0002759 , L0002760 , L0002761 , L0002762 , L0002763 , L0002764 ,  
L0002765 , L0002766 , L0002767 , L0002768 , L0002769 , L0002770 , L0002771 , L0002772 ,  
L0002773 , L0002774 , L0002775 , L0002776 , L0002777 , L0002778 , L0002779 , L0002780 ,  
L0002781 , L0002782 , L0002783 , L0002784 , L0002785 , L0002786 , L0002787 , L0002788 ,  
L0002789 , L0002790 , L0002791 , L0002792 ,  
\*\*\* AERMOD - VERSION 21112 \*\*\* \*\*\* C:\AERMOD\Venice\Venice.isc \*\*\* 10/01/21  
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\*\*\* MODELOPTS: RegDEFAULT CONC ELEV URBAN ADJ\_U\*

\* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY \*

hour SCALAR hour SCALAR hour SCALAR hour SCALAR hour SCALAR hour SCALAR hour  
SCALAR

SOURCE ID = L0004318 : SOURCE TYPE = VOLUME :

1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00  
7 .00000E+00 8 .10000E+01 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01  
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .00000E+00 17 .00000E+00 18 .00000E+00  
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = L0004319 : SOURCE TYPE = VOLUME :

1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00  
7 .00000E+00 8 .10000E+01 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01  
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .00000E+00 17 .00000E+00 18 .00000E+00  
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = L0004320 : SOURCE TYPE = VOLUME :

1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00  
7 .00000E+00 8 .10000E+01 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01  
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .00000E+00 17 .00000E+00 18 .00000E+00  
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = L0004321 : SOURCE TYPE = VOLUME :

1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00  
7 .00000E+00 8 .10000E+01 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01  
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .00000E+00 17 .00000E+00 18 .00000E+00  
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = L0004322 : SOURCE TYPE = VOLUME :

1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00  
7 .00000E+00 8 .10000E+01 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01  
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .00000E+00 17 .00000E+00 18 .00000E+00  
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

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\*\*\* AERMET - VERSION 16216 \*\*\* \*\*\* 13:24:08 \*\*\*

\*\*\* MODELOPTS: RegDEFAULT CONC ELEV URBAN ADJ\_U\*

\* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY \*

hour SCALAR hour SCALAR hour SCALAR hour SCALAR hour SCALAR hour  
SCALAR

SOURCE ID = L0004323 : SOURCE TYPE = VOLUME :

1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00  
7 .00000E+00 8 .10000E+01 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01  
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .00000E+00 17 .00000E+00 18 .00000E+00  
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = L0004324 : SOURCE TYPE = VOLUME :

1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00  
7 .00000E+00 8 .10000E+01 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01  
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .00000E+00 17 .00000E+00 18 .00000E+00  
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00



```

1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .10000E+01 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .00000E+00 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = L0004346 : SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .10000E+01 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .00000E+00 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = L0004347 : SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .10000E+01 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .00000E+00 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

***** AERMOD - VERSION 21112 *** ** C:\AERMOD\Venice\Isc
*** AERMET - VERSION 16216 *** ***
*** MODEL_OPTS: RegDFault CONC ELEV URBAN ADJ_U*
* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY*

  HOUR SCALAR  HOUR SCALAR  HOUR SCALAR  HOUR SCALAR  HOUR SCALAR  HOUR SCALAR  HOUR SCALAR  HOUR
  SCALAR
-----
SOURCE ID = L0004348 : SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .10000E+01 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .00000E+00 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = L0004349 : SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .10000E+01 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .00000E+00 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = L0004350 : SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .10000E+01 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .00000E+00 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = L0004351 : SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .10000E+01 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .00000E+00 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = L0004352 : SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .10000E+01 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .00000E+00 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

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**** AERMOD - VERSION 21112 *** C:\AERMOD\Venice\isc
**** AERMET - VERSION 16216 ***
*** MODEL_OPTS: RegDFault CONC ELEV URBAN ADJ_U*
***
* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *
  HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR
  SCALAR
  SOURCE ID = L0004373 ; SOURCE TYPE = VOLUME ;
  1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
  7 .00000E+00 8 .10000E+01 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
  13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .00000E+00 17 .00000E+00 18 .00000E+00
  19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00
  SOURCE ID = L0004374 ; SOURCE TYPE = VOLUME ;
  1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
  7 .00000E+00 8 .10000E+01 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
  13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .00000E+00 17 .00000E+00 18 .00000E+00
  19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00
  SOURCE ID = L0004375 ; SOURCE TYPE = VOLUME ;
  1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
  7 .00000E+00 8 .10000E+01 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
  13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .00000E+00 17 .00000E+00 18 .00000E+00
  19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00
  SOURCE ID = L0004376 ; SOURCE TYPE = VOLUME ;
  1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
  7 .00000E+00 8 .10000E+01 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
  13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .00000E+00 17 .00000E+00 18 .00000E+00
  19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00
  SOURCE ID = L0004377 ; SOURCE TYPE = VOLUME ;
  1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
  7 .00000E+00 8 .10000E+01 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
  13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .00000E+00 17 .00000E+00 18 .00000E+00
  19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00
  SOURCE ID = L0004378 ; SOURCE TYPE = VOLUME ;
  1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
  7 .00000E+00 8 .10000E+01 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
  13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .00000E+00 17 .00000E+00 18 .00000E+00
  19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00
  **** AERMOD - VERSION 21112 *** C:\AERMOD\Venice\isc
  **** AERMET - VERSION 16216 ***
  ***
  *** MODEL_OPTS: RegDFault CONC ELEV URBAN ADJ_U*
  ***
  * SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *
    HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR
    SCALAR
    SOURCE ID = L0004378 ; SOURCE TYPE = VOLUME ;
    1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
    7 .00000E+00 8 .10000E+01 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01

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13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .00000E+00 17 .00000E+00 18 .00000E+00  
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = L0004379 ; SOURCE TYPE = VOLUME ;

1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00  
7 .00000E+00 8 .10000E+01 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01  
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .00000E+00 17 .00000E+00 18 .00000E+00  
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = L0004380 ; SOURCE TYPE = VOLUME ;

1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00  
7 .00000E+00 8 .10000E+01 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01  
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .00000E+00 17 .00000E+00 18 .00000E+00  
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = L0004381 ; SOURCE TYPE = VOLUME ;

1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00  
7 .00000E+00 8 .10000E+01 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01  
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .00000E+00 17 .00000E+00 18 .00000E+00  
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = L0004382 ; SOURCE TYPE = VOLUME ;

1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00  
7 .00000E+00 8 .10000E+01 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01  
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .00000E+00 17 .00000E+00 18 .00000E+00  
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

\*\*\* AERMOD - VERSION 21112 \*\*\* C:\AERMOD\Venice\Venice.isc \*\*\* 10/01/21  
\*\*\* AERMET - VERSION 16216 \*\*\* \*\*\* 13:24:08

\*\*\* MODELOPTS: RegDEFAULT CONC ELEV URBAN ADJ\_U"

\* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY \*

hour scalar hour scalar hour scalar hour scalar hour scalar hour scalar hour  
SCALAR

SOURCE ID = L0004383 ; SOURCE TYPE = VOLUME ;

1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00  
7 .00000E+00 8 .10000E+01 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01  
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .00000E+00 17 .00000E+00 18 .00000E+00  
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = L0004384 ; SOURCE TYPE = VOLUME ;

1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00  
7 .00000E+00 8 .10000E+01 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01  
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .00000E+00 17 .00000E+00 18 .00000E+00  
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = L0004385 ; SOURCE TYPE = VOLUME ;

1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00  
7 .00000E+00 8 .10000E+01 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01  
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .00000E+00 17 .00000E+00 18 .00000E+00  
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

\*\*\* AERMET - VERSION 16216 \*\*\* \*\*\* 13:24:08

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\*\*\*MODELOPTS: ReadFAULT CONC ELEV URBAN ADJ U\*

\* SOURCE EMISSION RATE SCALE WHICH VARY FOR EACH HOUR OF THE DAY \*

[illegible]

SOURCE ID = L0004393 ; SOURCE TYPE = VOLUME ;

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+01	9	.00000E+01	10	.00000E+01	11	.00000E+01	12	.00000E+01
13	.00000E+01	14	.00000E+01	15	.00000E+01	16	.00000E+00	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = L0004394 ; SOURCE TYPE = VOLUME ;

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+01	9	.00000E+01	10	.00000E+01	11	.00000E+01	12	.00000E+01
13	.00000E+01	14	.00000E+01	15	.00000E+01	16	.00000E+01	17	.00000E+01	18	.00000E+01
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = L0004395 ; SOURCE TYPE = VOLUME ;

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+01	9	.00000E+01	10	.00000E+01	11	.00000E+01	12	.00000E+01
13	.00000E+01	14	.00000E+01	15	.00000E+01	16	.00000E+00	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = L0004396 ; SOURCE TYPE = VOLUME ;

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+01	9	.00000E+01	10	.00000E+01	11	.00000E+01	12	.00000E+01
13	.00000E+01	14	.00000E+01	15	.00000E+01	16	.00000E+00	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = L0004397 ; SOURCE TYPE = VOLUME ;

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+01	9	.00000E+01	10	.00000E+01	11	.00000E+01	12	.00000E+01
13	.00000E+01	14	.00000E+01	15	.00000E+01	16	.00000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

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***
AERMOD - VERSION 21112 ***
*** C:\AERMOD\Venice\Venice.isc
***
10/01/21

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\*\*\* AERMET - VERSION 16216 \*\*\*

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\*\*\* MODLOPTS: RegDEFAULT CONC FLEV URBAN ADJ U\*

\* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY \*

[illegible]

SOURCE ID = L0004398 : SOURCE TYPE = VOLUME :

Year	1	2	3	4	5	6
1990	1.0000E+00	2.0000E+00	3.0000E+00	4.0000E+00	5.0000E+00	6.0000E+00
1991	7.0000E+00	8.0000E+01	9.0000E+01	10.0000E+01	11.0000E+01	12.0000E+01
1992	13.0000E+01	14.0000E+01	15.0000E+01	16.0000E+01	17.0000E+01	18.0000E+01
1993	19.0000E+01	20.0000E+01	21.0000E+01	22.0000E+01	23.0000E+01	24.0000E+01
1994	25.0000E+01	26.0000E+01	27.0000E+01	28.0000E+01	29.0000E+01	30.0000E+01
1995	31.0000E+01	32.0000E+01	33.0000E+01	34.0000E+01	35.0000E+01	36.0000E+01
1996	37.0000E+01	38.0000E+01	39.0000E+01	40.0000E+01	41.0000E+01	42.0000E+01
1997	43.0000E+01	44.0000E+01	45.0000E+01	46.0000E+01	47.0000E+01	48.0000E+01
1998	49.0000E+01	50.0000E+01	51.0000E+01	52.0000E+01	53.0000E+01	54.0000E+01
1999	55.0000E+01	56.0000E+01	57.0000E+01	58.0000E+01	59.0000E+01	60.0000E+01
2000	61.0000E+01	62.0000E+01	63.0000E+01	64.0000E+01	65.0000E+01	66.0000E+01
2001	67.0000E+01	68.0000E+01	69.0000E+01	70.0000E+01	71.0000E+01	72.0000E+01
2002	73.0000E+01	74.0000E+01	75.0000E+01	76.0000E+01	77.0000E+01	78.0000E+01
2003	79.0000E+01	80.0000E+01	81.0000E+01	82.0000E+01	83.0000E+01	84.0000E+01
2004	85.0000E+01	86.0000E+01	87.0000E+01	88.0000E+01	89.0000E+01	90.0000E+01
2005	91.0000E+01	92.0000E+01	93.0000E+01	94.0000E+01	95.0000E+01	96.0000E+01
2006	97.0000E+01	98.0000E+01	99.0000E+01	100.0000E+01	101.0000E+01	102.0000E+01
2007	103.0000E+01	104.0000E+01	105.0000E+01	106.0000E+01	107.0000E+01	108.0000E+01
2008	109.0000E+01	110.0000E+01	111.0000E+01	112.0000E+01	113.0000E+01	114.0000E+01
2009	115.0000E+01	116.0000E+01	117.0000E+01	118.0000E+01	119.0000E+01	120.0000E+01
2010	121.0000E+01	122.0000E+01	123.0000E+01	124.0000E+01	125.0000E+01	126.0000E+01
2011	127.0000E+01	128.0000E+01	129.0000E+01	130.0000E+01	131.0000E+01	132.0000E+01
2012	133.0000E+01	134.0000E+01	135.0000E+01	136.0000E+01	137.0000E+01	138.0000E+01
2013	139.0000E+01	140.0000E+01	141.0000E+01	142.0000E+01	143.0000E+01	144.0000E+01
2014	145.0000E+01	146.0000E+01	147.0000E+01	148.0000E+01	149.0000E+01	150.0000E+01
2015	151.0000E+01	152.0000E+01	153.0000E+01	154.0000E+01	155.0000E+01	156.0000E+01
2016	157.0000E+01	158.0000E+01	159.0000E+01	160.0000E+01	161.0000E+01	162.0000E+01
2017	163.0000E+01	164.0000E+01	165.0000E+01	166.0000E+01	167.0000E+01	168.0000E+01
2018	169.0000E+01	170.0000E+01	171.0000E+01	172.0000E+01	173.0000E+01	174.0000E+01
2019	175.0000E+01	176.0000E+01	177.0000E+01	178.0000E+01	179.0000E+01	180.0000E+01
2020	181.0000E+01	182.0000E+01	183.0000E+01	184.0000E+01	185.0000E+01	186.0000E+01
2021	187.0000E+01	188.0000E+01	189.0000E+01	190.0000E+01	191.0000E+01	192.0000E+01
2022	193.0000E+01	194.0000E+01	195.0000E+01	196.0000E+01	197.0000E+01	198.0000E+01
20						

## Exhibit C to Attachment A

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[illegible]

SOURCE ID = L000433	; SOURCE TYPE = VOLUME											
1 .00000E+00	2 .00000E+00	3 .00000E+00	4 .00000E+00	5 .00000E+00	6 .00000E+00							
7 .00000E+00	8 .10000E+01	9 .10000E+01	10 .10000E+01	11 .10000E+01	12 .10000E+01							
13 .10000E+01	14 .10000E+01	15 .10000E+01	16 .10000E+01	17 .00000E+00	18 .00000E+00							
19 .00000E+00	20 .00000E+00	21 .00000E+00	22 .00000E+00	23 .00000E+00	24 .00000E+00							

SOURCE ID = L000434 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.10000E+01	9	.10000E+01	10	.10000E+01	11	.10000E+01	12	.10000E+01
13	.10000E+01	14	.10000E+01	15	.10000E+01	16	.00000E+00	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = L0004435	; SOURCE TYPE = VOLUME :											
1 .00000E+00	2 .00000E+00	3 .00000E+00	4 .00000E+00	5 .00000E+00	6 .00000E+00							
7 .00000E+00	8 .10000E+01	9 .10000E+01	10 .10000E+01	11 .10000E+01	12 .10000E+01							
13 .10000E+01	14 .10000E+01	15 .10000E+01	16 .00000E+00	17 .00000E+00	18 .00000E+00							
19 .00000E+00	20 .00000E+00	21 .00000E+00	22 .00000E+00	23 .00000E+00	24 .00000E+00							

ALNMIET - VERSION 10Z10  
PAGE 37  
13:24:00

\* SOURCE EMISSION RATE SCALE WHICH VARIES FOR EACH HOUR OF THE DAY \*\*

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SOURCE ID = L0004443 ; SOURCE TYPE = VOLUME ;
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .10000E+01 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .00000E+00 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

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REINWELT - VERSION 102.10  
PAGE 36  
13.2.21.00

\* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY \*

SOURCE ID = L000438	SOURCE TYPE = VOLUME	
1 .00000E+00	2 .00000E+00	3 .00000E+00
7 .00000E+00	8 .10000E+01	9 .10000E+01
13 .10000E+01	14 .10000E+01	15 .10000E+01
19 .00000E+00	20 .00000E+00	21 .00000E+00
		22 .00000E+00
		23 .00000E+00
		24 .00000E+00
		25 .00000E+00
		26 .00000E+00
		27 .00000E+00
		28 .00000E+00
		29 .00000E+00
		30 .00000E+00
		31 .00000E+00
		32 .00000E+00
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		96 .00000E+00
		97 .00000E+00
		98 .00000E+00
		99 .00000E+00
		100 .00000E+00

SOURCE ID = L0004439		SOURCE TYPE = VOLUME	
1	.00000E+00	2	.00000E+00
3	.00000E+00	4	.00000E+00
5	.00000E+00	6	.00000E+00

[illegible]

SOURCE ID = L0004454 ; SOURCE TYPE = VOLUME ;

19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00
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SOURCE ID = L0004455      ; SOURCE TYPE = VOLUME ;
1 .00000E+00  2 .00000E+00  3 .00000E+00  4 .00000E+00  5 .00000E+00  6 .00000E+00
7 .00000E+00  8 .10000E+01  9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+00 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

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SOURCE ID = L0004456 ; SOURCE TYPE = VOLUME ;											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.00000E+01	10	.00000E+01	11	.00000E+01	12	.00000E+01
13	.00000E+01	14	.00000E+01	15	.00000E+01	16	.00000E+00	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = L0004457 ; SOURCE TYPE = VOLUME ;									
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00
6	.00000E+00	7	.00000E+00	8	.00000E+00	9	.00000E+00	10	.00000E+00
11	.00000E+00	12	.00000E+00	13	.00000E+00	14	.00000E+00	15	.00000E+00
16	.00000E+00	17	.00000E+00	18	.00000E+00	19	.00000E+00	20	.00000E+00
21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00	25	.00000E+00

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** *** AERMOD - VERSION 21112 *** C:\AERMOD\Venice\Venice.isc 10/01/21
***
*** AERMET - VERSION 16216 *** 13:24:08
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\*\*\* MODELOPTS: RegDFault Conc Elev Urban Adj\_U\*  
 \* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY \*  
 HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR

SOURCE ID = L0004458 : SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.10000E+01	9	.10000E+01	10	.10000E+01	11	.10000E+01	12	.10000E+01
13	.10000E+01	14	.10000E+01	15	.10000E+01	16	.00000E+00	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

[illegible]

[illegible]



Exhibit C to Attachment A  
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***  
AERMOD - VERSION 21112 *** C:\AERMOD\Venice\Venice.isc  
***  
AERMET - VERSION 16216 ***  
***  
10/01/21
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\*\*\* MODELOPTS: ReqDFAULT CONC ELEV URBAN ADJ\_U\*

\* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY \*

[illegible]

SOURCE ID = L0002767 ; SOURCE TYPE = VOLUME ;

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+01	9	.00000E+01	10	.00000E+01	11	.00000E+01	12	.00000E+01
13	.00000E+01	14	.00000E+01	15	.00000E+01	16	.00000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = L0002768 ; SOURCE TYPE = VOLUME ;

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+01	9	.00000E+01	10	.00000E+01	11	.00000E+01	12	.00000E+01
13	.00000E+01	14	.00000E+01	15	.00000E+01	16	.00000E+01	17	.00000E+01	18	.00000E+01
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = L0002769 : SOURCE TYPE = VOLUME :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+01	9	.00000E+01	10	.00000E+01	11	.00000E+01	12	.00000E+01
13	.00000E+01	14	.00000E+01	15	.00000E+01	16	.00000E+01	17	.00000E+01	18	.00000E+01
19	.00000E+00	20	.00000E+01	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = L0002770 ; SOURCE TYPE = VOLUME ;

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+01	9	.00000E+01	10	.00000E+01	11	.00000E+01	12	.00000E+01
13	.00000E+01	14	.00000E+01	15	.00000E+01	16	.00000E+00	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = L0002771 : SOURCE TYPE = VOLUME :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+01	9	.00000E+01	10	.00000E+01	11	.00000E+01	12	.00000E+01
13	.00000E+01	14	.00000E+01	15	.00000E+01	16	.00000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

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#  ## ***** AERMOD - VERSION 21112 *** C:\AERMOD\Venice\isc
***** AFMNET - VERSION 16216 *****
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13:24:08
***
10/01/21

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AERMET - VERSION 16216 \*\*\*  
\*\*\*  
\*\*\*  
13:24:08

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\*\*\*MODELOPTS: ReqDEFAULT CONC ELEV URBAN ADJ U \*

\* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY \*

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR
SCALAR							

SOURCE ID = L0002772 ; SOURCE TYPE = VOLUME ;

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.00000E+01	10	.00000E+01	11	.00000E+01	12	.00000E+01



Exhibit C to Attachment A  
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Exhibit C to Attachment A  
Page 228

\*\*\* MODELOPTS: RegDEFAULT CONC ELEV URBAN ADJ\_U"  
(1=YES;0=NO)  
\*\*\* METEOROLOGICAL DAYS SELECTED FOR PROCESSING \*\*\*  
120101 120 -5.7 0.106 -9.000 -999. 83. 18.6 0.17 2.20 1.00 1.18 182. 10.1 284.9 2.0  
120101 121 -999.0 -9.000 -9.000 -999. -999. -999. 0.17 2.20 1.00 0.00 0. 10.1 284.2 2.0  
120101 122 -7.3 0.119 -9.000 -9.000 -999. 99. 21.1 0.17 2.20 1.00 1.33 202. 10.1 285.4 2.0  
120101 123 -6.0 0.108 -9.000 -9.000 -999. 86. 19.1 0.17 2.20 1.00 1.21 251. 10.1 284.9 2.0  
120101 124 -5.4 0.102 -9.000 -9.000 -999. 78. 18.0 0.17 2.20 1.00 1.14 224. 10.1 284.2 2.0

First hour of profile data  
YR MO DY HR HEIGHT F WDJR WSPD AMB TMP SigmaA sigmaW sigmaV  
12 01 01 01 10.1 1 131. 1.26 283.2 99.0 -99.00 -99.00

F indicates top of profile (=1) or below (=0)  
\*\*\* AERMOD - VERSION 21112 \*\*\* \*\*\* C:\AERMOD\Venice\Venice.isc \*\*\* 10/01/21  
\*\*\* AERMET - VERSION 16216 \*\*\* \*\*\*

\*\*\* MODELOPTS: RegDEFAULT CONC ELEV URBAN ADJ\_U"  
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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)

\*\*\* AERMOD - VERSION 21112 \*\*\* \*\*\* C:\AERMOD\Venice\Venice.isc \*\*\* 10/01/21  
1.54, 3.09, 5.14, 8.23, 10.80,  
\*\*\* AERMET - VERSION 16216 \*\*\* \*\*\* 13:24:08

\*\*\* MODELOPTS: RegDEFAULT CONC ELEV URBAN ADJ\_U"

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

Met Version: 16216

Surface file: Met\KSMO\_v9 SFC  
Profile file: Met\KSMO\_v9 PFL  
Surface format: FREE  
Profile format: FREE  
Surface station no.: 93197 Upper air station no.: 3190  
Name: UNKNOWN Name: UNKNOWN  
Year: 2012 Year: 2012

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

120101 101 -6.6 0.113 -9.000 -9.000 -999. 91. 19.8 0.17 2.20 1.00 1.26 131. 10.1 283.1 2.0  
120101 102 -7.6 0.121 -9.000 -9.000 -999. 101. 21.3 0.17 2.20 1.00 1.35 232. 10.1 282.0 2.0  
120101 103 -3.3 0.082 -9.000 -9.000 -999. 57. 15.3 0.17 2.20 1.00 0.86 46. 10.1 280.9 2.0  
120101 104 -5.4 0.102 -9.000 -9.000 -999. 79. 17.9 0.17 2.20 1.00 1.14 82. 10.1 281.4 2.0  
120101 105 -6.6 0.113 -9.000 -9.000 -999. 91. 19.8 0.17 2.20 1.00 1.26 205. 10.1 281.4 2.0  
120101 106 -7.4 0.119 -9.000 -9.000 -999. 99. 20.9 0.17 2.20 1.00 1.33 254. 10.1 280.9 2.0  
120101 107 -4.6 0.094 -9.000 -9.000 -999. 70. 16.6 0.17 2.20 1.00 1.04 39. 10.1 279.2 2.0  
120101 108 -16.0 0.197 -9.000 -9.000 -999. 209. 43.0 0.17 2.20 0.54 2.10 63. 10.1 282.0 2.0  
120101 109 36.8 0.255 0.339 0.005 38. 309. -40.8 0.17 2.20 0.31 2.27 33. 10.1 292.0 2.0  
120101 110 102.6 0.234 0.691 0.006 117. 271. -11.3 0.17 2.20 0.23 1.79 204. 10.1 289.2 2.0  
120101 111 154.6 0.178 1.118 0.005 327. 181. -3.3 0.17 2.20 0.20 1.11 119. 10.1 296.4 2.0  
120101 112 182.0 0.295 1.459 0.005 618. 385. -12.8 0.17 2.20 0.19 2.30 76. 10.1 300.9 2.0  
120101 113 175.0 0.355 1.686 0.005 991. 507. -23.0 0.17 2.20 0.19 2.98 179. 10.1 293.8 2.0  
120101 114 148.1 0.374 1.737 0.005 1282. 549. -31.9 0.17 2.20 0.20 3.25 211. 10.1 292.0 2.0  
120101 115 98.0 0.291 1.572 0.005 1436. 380. -22.7 0.17 2.20 0.23 2.44 231. 10.1 290.9 2.0  
120101 116 28.2 0.303 1.044 0.005 1460. 400. -89.0 0.17 2.20 0.32 2.85 217. 10.1 289.2 2.0  
120101 117 -22.4 0.259 -9.000 -9.000 -999. 317. 73.7 0.17 2.20 0.58 2.73 226. 10.1 287.0 2.0  
120101 118 -8.7 0.131 -9.000 -9.000 -999. 124. 23.3 0.17 2.20 1.00 1.45 230. 10.1 286.4 2.0  
120101 119 -13.2 0.163 -9.000 -9.000 -999. 157. 29.4 0.17 2.20 1.00 1.77 225. 10.1 285.9 2.0

364420.00	3761480.00	7.75793	364430.00	3761480.00	6.50322
364440.00	3761480.00	5.47706	364450.00	3761480.00	4.63593
364460.00	3761480.00	3.94693	364180.00	3761490.00	5.50342
364190.00	3761490.00	6.94847	364200.00	3761490.00	9.07748
*** AERMOD - VERSION 12112	***	***	C:\AERMOD\Venice\isc	***	***
*** AERMET - VERSION 16216	***	***		***	132408
				PAGE 69	

\*\*\*MODELOPTS: RegDFAULT CONC ELEV URBAN ADJ\_U\*

\*\*\* THE PERIOD ( 43848 HRS) AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP:  
\*\*\*  
CONST

INCLUDING SOURCE(S): L0004318, L0004319, L0004320, L0004321, L0004322, L0004323, L0004324, L0004325, L0004326, L0004327, L0004328, L0004329, L0004330, L0004331, L0004332, L0004333, L0004334, L0004335, L0004337, L0004338, L0004339, L0004340, L0004341, L0004342, L0004343, L0004344, L0004345, . . . .

\*\*\* DISCRETE CARTESIAN RECEPTOR POINTS \*\*\*

\*\* CONC OF DPM IN MICROGRAMS/M\*\*3

X-COORD (M)		Y-COORD (M)	CONC	X-COORD (M)		Y-COORD (M)	CONC
364380.0	3761490.00	22.79972		364390.00	3761490.00	17.99321	
364400.0	3761490.00	14.42803		364410.00	3761490.00	11.70411	
364420.0	3761490.00	9.57801		364430.00	3761490.00	7.88852	
364440.0	3761490.00	6.53433		364450.00	3761490.00	5.44640	
364460.0	3761490.00	4.57352		364470.00	3761490.00	3.87241	
364180.0	3761500.00	5.14411		364190.00	3761500.00	6.36120	
364200.0	3761500.00	8.05458		364390.00	3761500.00	24.46241	
364400.0	3761500.00	19.09355		364410.00	3761500.00	15.11450	
364420.0	3761500.00	12.08892		364430.00	3761500.00	9.74005	
364440.0	3761500.00	7.90205		364450.00	3761500.00	6.46298	
364460.0	3761500.00	5.33927		364470.00	3761500.00	4.46087	
364480.0	3761500.00	3.76942		364180.00	3761510.00	4.74968	
364190.0	3761510.00	5.75560		364200.00	3761510.00	7.09467	
364210.0	3761510.00	8.92757		364220.00	3761510.00	11.52601	
364240.0	3761510.00	20.05185		364250.00	3761510.00	27.00650	
364260.0	3761510.00	36.40265		364400.00	3761510.00	26.27376	
364410.0	3761510.00	20.23749		364420.00	3761510.00	15.71612	
364430.0	3761510.00	12.29965		364440.00	3761510.00	9.70778	
364450.0	3761510.00	7.74843		364460.00	3761510.00	6.27542	
364470.0	3761510.00	5.16397		364480.00	3761510.00	4.31349	
364180.0	3761520.00	4.35211		364190.00	3761520.00	5.19500	
364200.0	3761520.00	6.28584		364210.00	3761520.00	7.70871	
364220.0	3761520.00	9.60680		364230.00	3761520.00	12.12075	
364240.0	3761520.00	15.49184		364250.00	3761520.00	20.07403	
364260.0	3761520.00	26.26860		364270.00	3761520.00	34.56410	
364420.0	3761520.00	21.23335		364430.00	3761520.00	15.97418	
364440.0	3761520.00	12.13722		364450.00	3761520.00	9.38492	
364460.0	3761520.00	7.41890		364470.00	3761520.00	6.00002	
364480.0	3761520.00	4.95104		364200.00	3761530.00	5.58432	
364210.0	3761530.00	6.71323		364220.00	3761530.00	8.13634	
364230.0	3761530.00	9.97336		364240.00	3761530.00	12.36851	
364250.0	3761530.00	15.51757		364260.00	3761530.00	19.65751	
364270.0	3761530.00	25.13899		364280.00	3761530.00	32.42844	
364430.0	3761530.00	21.47602		364440.00	3761530.00	15.46204	
364450.0	3761530.00	11.45602		364460.00	3761530.00	8.79779	
364470.0	3761530.00	6.98467		364480.00	3761530.00	5.69393	
364210.0	3761540.00	5.87570		364220.00	3761540.00	6.97271	
364230.0	3761540.00	8.35386		364240.00	3761540.00	10.11341	
364250.0	3761540.00	12.35950		364260.00	3761540.00	15.23739	
364270.0	3761540.00	18.95388		364280.00	3761540.00	23.77210	

[illegible]

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\*\*\* MODELOPTS: ReqDFAULT CONC ELEV URBAN ADJ\_U\*

\*\*\* THE PERIOD ( 43848 HRS) AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP:

CONST	***	INCLUDING SOURCE(S):	L0004318	L0004319	L0004320	L0004321	L0004322
		L0004323	L0004324	L0004325	L0004326	L0004328	L0004329
		L0004331	L0004332	L0004333	L0004334	L0004335	L0004336
		L0004339	L0004340	L0004341	L0004342	L0004343	L0004344
		L0004337	L0004338	L0004337	L0004337	L0004337	L0004338
		L0004345	L0004345	L0004345	L0004345	L0004345	L0004345

\*\*\* DISCRETE CARTESIAN RECEPTOR POINTS \*\*\*

CONC OF DPM IN MICROGRAMS/M<sup>3</sup>

X-COORD (M)		Y-COORD (M)	CONC	X-COORD (M)		Y-COORD (M)	CONC
364320.00	3761430.00	12.33821	364330.00	3761430.00	10.62175		
364340.00	3761430.00	9.22781	364350.00	3761430.00	8.06910		
364360.00	3761430.00	7.07992	364370.00	3761430.00	6.22266		
364380.00	3761430.00	5.48229	364180.00	3761440.00	5.39680		
364390.00	3761440.00	6.80627	364200.00	3761440.00	8.88101		
364210.00	3761440.00	12.08883	364220.00	3761440.00	17.26012		
364310.00	3761440.00	20.04752	364320.00	3761440.00	16.64862		
364330.00	3761440.00	13.90237	364340.00	3761440.00	11.79884		
364350.00	3761440.00	10.13760	364360.00	3761440.00	8.75711		
364370.00	3761440.00	7.59236	364380.00	3761440.00	6.60654		
364390.00	3761440.00	5.76693	364400.00	3761440.00	5.04703		
364180.00	3761450.00	5.73177	364190.00	3761450.00	7.35524		
364200.00	3761450.00	9.85597	364210.00	3761450.00	14.00610		
364320.00	3761450.00	23.36792	364330.00	3761450.00	18.78363		
364340.00	3761450.00	15.49293	364350.00	3761450.00	13.03841		
364360.00	3761450.00	11.06135	364370.00	3761450.00	9.43916		
364380.00	3761450.00	8.09524	364390.00	3761450.00	6.96996		
364400.00	3761450.00	6.02154	364410.00	3761450.00	5.21835		
364180.00	3761460.00	5.92335	364190.00	3761460.00	7.68454		
364200.00	3761460.00	10.49507	364210.00	3761460.00	15.44677		
364340.00	3761460.00	21.34391	364350.00	3761460.00	17.40407		
364360.00	3761460.00	14.38272	364370.00	3761460.00	12.00850		
364380.00	3761460.00	10.10570	364390.00	3761460.00	8.55952		
364400.00	3761460.00	7.28824	364410.00	3761460.00	6.23322		
364420.00	3761460.00	5.34929	364430.00	3761460.00	4.60648		
364180.00	3761470.00	5.94048	364190.00	3761470.00	7.71384		
364200.00	3761470.00	10.56115	364350.00	3761470.00	24.00674		
364360.00	3761470.00	19.25631	364370.00	3761470.00	15.66562		
364380.00	3761470.00	12.89011	364390.00	3761470.00	10.70823		
364400.00	3761470.00	8.96573	364410.00	3761470.00	7.55322		
364420.00	3761470.00	6.39548	364430.00	3761470.00	5.43860		
364440.00	3761470.00	4.64452	364180.00	3761480.00	5.78293		
364190.00	3761480.00	7.43549	364200.00	3761480.00	10.00692		
364360.00	3761480.00	26.68102	364370.00	3761480.00	21.08240		
364380.00	3761480.00	16.87756	364390.00	3761480.00	13.69207		
364400.00	3761480.00	11.23884	364410.00	3761480.00	9.30343		

Exhibit C to Attachment A  
Page 231

L0002752 , L0002753 , L0002754 , L0002755 , L0002756 , L0002757 , L0002758 , L0002759 ,  
L0002760 , L0002761 , L0002762 , L0002763 , L0002764 , L0002765 , L0002766 , L0002767 ,  
L0002768 , L0002769 , L0002770 , L0002771 , L0002772 , L0002773 , L0002774 , . . . ,

\*\*\* DISCRETE CARTESIAN RECEPTOR POINTS \*\*\*

\*\* CONC OF DPM IN MICROGRAMS/M\*\*3

X-COORD (M) Y-COORD (M) CONC X-COORD (M) Y-COORD (M) CONC

364220.00	3761370.00	5.45309	364230.00	3761370.00	5.81559
364240.00	3761370.00	6.10779	364250.00	3761370.00	6.29775
364260.00	3761370.00	6.36069	364290.00	3761370.00	5.85879
364210.00	3761380.00	6.05486	364220.00	3761380.00	6.64271
364230.00	3761380.00	7.18972	364240.00	3761380.00	7.64858
364250.00	3761380.00	7.95605	364260.00	3761380.00	8.08154
364280.00	3761380.00	7.73266	364290.00	3761380.00	7.38652
364300.00	3761380.00	6.87631	364310.00	3761380.00	6.24255
364210.00	3761390.00	7.33011	364220.00	3761390.00	8.20921
364230.00	3761390.00	9.05742	364240.00	3761390.00	9.80569
364250.00	3761390.00	10.33898	364270.00	3761390.00	10.50065
364280.00	3761390.00	10.07783	364290.00	3761390.00	9.50820
364300.00	3761390.00	8.67335	364310.00	3761390.00	7.69743
364320.00	3761390.00	6.75336	364330.00	3761400.00	7.70903
364210.00	3761400.00	8.94511	364220.00	3761400.00	10.28619
364230.00	3761400.00	11.65022	364240.00	3761400.00	12.93992
364270.00	3761400.00	14.30892	364280.00	3761400.00	13.60282
364290.00	3761400.00	12.53630	364300.00	3761400.00	11.15320
364310.00	3761400.00	9.66292	364320.00	3761400.00	8.27941
364330.00	3761400.00	7.03965	364340.00	3761400.00	5.96706
364190.00	3761410.00	7.68993	364200.00	3761410.00	9.18457
364210.00	3761410.00	10.98795	364220.00	3761410.00	13.07610
364230.00	3761410.00	15.35163	364240.00	3761410.00	17.69333
364270.00	3761410.00	20.44733	364280.00	3761410.00	19.09346
364290.00	3761410.00	17.05744	364300.00	3761410.00	14.69125
364310.00	3761410.00	12.34304	364320.00	3761410.00	10.27010
364330.00	3761410.00	8.50255	364340.00	3761410.00	7.04563
364350.00	3761410.00	5.86596	364180.00	3761420.00	7.28964
364190.00	3761420.00	8.86169	364200.00	3761420.00	10.90022
364210.00	3761420.00	13.52372	364220.00	3761420.00	16.81008
364230.00	3761420.00	20.75009	364280.00	3761420.00	28.11194
364290.00	3761420.00	24.07677	364300.00	3761420.00	19.89182
364310.00	3761420.00	16.07850	364320.00	3761420.00	12.90384
364330.00	3761420.00	10.35230	364340.00	3761420.00	8.36376
364350.00	3761420.00	6.82617	364360.00	3761420.00	5.63273
364370.00	3761420.00	4.69536	364180.00	3761430.00	8.09086
364190.00	3761430.00	10.06515	364200.00	3761430.00	12.76557
364210.00	3761430.00	16.49567	364220.00	3761430.00	21.64958
364230.00	3761430.00	28.65100	364290.00	3761430.00	35.52022
364300.00	3761430.00	27.92265	364310.00	3761430.00	21.52608

\*\*\*\* AERMOD - VERSION 21112 \*\*\* \*\* C:\AERMOD\Venice\Venice.isc

\*\*\* AERMET - VERSION 16216 \*\*\*

\*\*\* 13:24:08

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\*\*\* MODELOPTs: RegDefault CONC Elev Urban Adj\_U"

\*\*\* THE PERIOD ( 43848 HRS) AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP:

LOADING \*\*\*

INCLUDING SOURCE(S): L0002747 , L0002748 , L0002749 , L0002750 , L0002751 ,  
L0002752 , L0002753 , L0002754 , L0002755 , L0002756 , L0002757 , L0002758 , L0002759 ,  
L0002760 , L0002761 , L0002762 , L0002763 , L0002764 , L0002765 , L0002766 , L0002767 ,  
L0002768 , L0002769 , L0002770 , L0002771 , L0002772 , L0002773 , L0002774 , . . . ,

\*\*\* DISCRETE CARTESIAN RECEPTOR POINTS \*\*\*

\*\* CONC OF DPM IN MICROGRAMS/M\*\*3

X-COORD (M) Y-COORD (M) CONC X-COORD (M) Y-COORD (M) CONC

364320.00	3761430.00	16.49129	364330.00	3761430.00	12.72422
364340.00	3761430.00	9.99331	364350.00	3761430.00	7.99160
364360.00	3761430.00	6.49406	364370.00	3761430.00	5.35208
364380.00	3761430.00	4.47394	364180.00	3761440.00	8.81211
364190.00	3761440.00	11.19780	364200.00	3761440.00	14.62347
364210.00	3761440.00	19.72141	364220.00	3761440.00	27.56776
364310.00	3761440.00	29.72385	364320.00	3761440.00	21.50991
364330.00	3761440.00	15.84796	364340.00	3761440.00	12.07376
364350.00	3761440.00	9.47091	364360.00	3761440.00	7.58821
364370.00	3761440.00	6.18964	364380.00	3761440.00	5.13135
364390.00	3761440.00	4.31440	364400.00	3761440.00	3.67146
364180.00	3761450.00	9.36548	364190.00	3761450.00	12.10077
364200.00	3761450.00	16.18455	364210.00	3761450.00	22.66480
364320.00	3761450.00	28.62069	364330.00	3761450.00	20.03259
364340.00	3761450.00	14.82118	364350.00	3761450.00	11.42409
364360.00	3761450.00	9.03366	364370.00	3761450.00	7.29195
364380.00	3761450.00	5.99003	364390.00	3761450.00	4.99329
364400.00	3761450.00	4.21524	364410.00	3761450.00	3.59809
364180.00	3761460.00	9.65475	364190.00	3761460.00	12.60956
364200.00	3761460.00	17.14391	364210.00	3761460.00	24.69462
364340.00	3761460.00	18.77221	364350.00	3761460.00	14.14086
364360.00	3761460.00	10.98118	364370.00	3761460.00	8.73763
364380.00	3761460.00	7.09141	364390.00	3761460.00	5.85149
364400.00	3761460.00	4.89638	364410.00	3761460.00	4.14670
364420.00	3761460.00	3.54791	364430.00	3761460.00	3.06392
364180.00	3761470.00	9.63197	364190.00	3761470.00	12.60818
364200.00	3761470.00	17.20634	364350.00	3761470.00	17.51312
364360.00	3761470.00	13.37237	364370.00	3761470.00	10.49590
364380.00	3761470.00	8.42157	364390.00	3761470.00	6.88135
364400.00	3761470.00	5.70959	364410.00	3761470.00	4.79897
364420.00	3761470.00	4.07909	364430.00	3761470.00	3.50146
364440.00	3761470.00	3.03214	364180.00	3761480.00	9.29842
364190.00	3761480.00	12.09153	364200.00	3761480.00	16.33655
364360.00	3761480.00	15.92403	364370.00	3761480.00	12.40421
364380.00	3761480.00	9.88147	364390.00	3761480.00	8.02060
364400.00	3761480.00	6.61458	364410.00	3761480.00	5.52794
364420.00	3761480.00	4.67459	364430.00	3761480.00	3.99302
364440.00	3761480.00	3.44130	364450.00	3761480.00	2.98958
364460.00	3761480.00	2.61601	364180.00	3761490.00	8.74870
364190.00	3761490.00	11.20615	364200.00	3761490.00	14.81466

\*\*\*\* AERMOD - VERSION 21112 \*\*\* \*\* C:\AERMOD\Venice\Venice.isc

\*\*\* AERMET - VERSION 16216 \*\*\*

\*\*\* 13:24:08

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\*\*\* MODELOPTs: RegDefault CONC Elev Urban Adj\_U"

\*\*\* THE PERIOD ( 43848 HRS) AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP:

LOADING \*\*\*

INCLUDING SOURCE(S): L0002747 , L0002748 , L0002749 , L0002750 , L0002751 ,  
L0002752 , L0002753 , L0002754 , L0002755 , L0002756 , L0002757 , L0002758 , L0002759 ,  
L0002760 , L0002761 , L0002762 , L0002763 , L0002764 , L0002765 , L0002766 , L0002767 ,  
L0002768 , L0002769 , L0002770 , L0002771 , L0002772 , L0002773 , L0002774 , . . . ,

\*\*\* DISCRETE CARTESIAN RECEPTOR POINTS \*\*\*

\*\* CONC OF DPM IN MICROGRAMS/M\*\*3

X-COORD (M) Y-COORD (M) CONC			X-COORD (M) Y-COORD (M) CONC		
364380.00	3761490.00	11.29705	364390.00	3761490.00	9.16082
364400.00	3761490.00	7.54064	364410.00	3761490.00	6.28696
364420.00	3761490.00	5.30122	364430.00	3761490.00	4.51462
364440.00	3761490.00	3.87892	364450.00	3761490.00	3.35942
364460.00	3761490.00	2.93063	364470.00	3761490.00	2.57345
364180.00	3761500.00	8.04361	364190.00	3761500.00	10.10369
364200.00	3761500.00	12.99403	364390.00	3761500.00	10.17312
364400.00	3761500.00	8.39758	364410.00	3761500.00	7.01125
364420.00	3761500.00	5.91405	364430.00	3761500.00	5.03476
364440.00	3761500.00	4.32220	364450.00	3761500.00	3.73888
364460.00	3761500.00	3.25687	364470.00	3761500.00	2.85508
364480.00	3761500.00	2.51751	364180.00	3761510.00	7.26372
364190.00	3761510.00	8.92871	364200.00	3761510.00	11.16763
364210.00	3761510.00	14.26062	364220.00	3761510.00	18.63763
364240.00	3761510.00	32.00396	364250.00	3761510.00	42.22693
364260.00	3761510.00	55.06133	364400.00	3761510.00	9.10189
364410.00	3761510.00	7.63861	364420.00	3761510.00	6.46641
364430.00	3761510.00	5.51844	364440.00	3761510.00	4.74474
364450.00	3761510.00	4.10791	364460.00	3761510.00	3.57936
364470.00	3761510.00	3.13720	364480.00	3761510.00	2.76466
364180.00	3761520.00	6.47596	364190.00	3761520.00	7.82614
364200.00	3761520.00	9.58099	364210.00	3761520.00	11.85358
364220.00	3761520.00	14.80151	364230.00	3761520.00	18.47781
364240.00	3761520.00	23.07603	364250.00	3761520.00	28.87918
364260.00	3761520.00	35.82639	364270.00	3761520.00	43.23253
364420.00	3761520.00	6.91806	364430.00	3761520.00	5.93360
364440.00	3761520.00	5.12112	364450.00	3761520.00	4.44602
364460.00	3761520.00	3.88163	364470.00	3761520.00	3.40676
364480.00	3761520.00	3.00489	364200.00	3761530.00	8.18755
364210.00	3761530.00	9.84905	364220.00	3761530.00	11.84671
364230.00	3761530.00	14.25145	364240.00	3761530.00	17.15339
364250.00	3761530.00	20.65725	364260.00	3761530.00	24.74950
364270.00	3761530.00	29.24081	364280.00	3761530.00	33.62034
364430.00	3761530.00	6.25511	364440.00	3761530.00	5.42977
364450.00	3761530.00	4.73521	364460.00	3761530.00	4.14865
364470.00	3761530.00	3.65145	364480.00	3761530.00	3.22800
364210.00	3761540.00	8.18021	364220.00	3761540.00	9.56875
364230.00	3761540.00	11.19884	364240.00	3761540.00	13.11319
364250.00	3761540.00	15.36292	364260.00	3761540.00	17.96577
364270.00	3761540.00	20.88592	364280.00	3761540.00	23.87855
*** AERMOD - VERSION 21112 ***			***		
*** AERMOD - VERSION 16216 ***			***		
*** C:\AERMOD\Venice\Venice.lsc			***		
*** MODELPTS: RegDFault CONC Elev Urban Adj_U*			PAGE 75		
*** THE PERIOD ( 4384 HRS) AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP:			***		
LOADING ***			***		
INCLUDING SOURCE(S):			***		
L0002752 , L0002753 , L0002754 , L0002755 , L0002756 , L0002757 , L0002758 , L0002759 , L0002760 , L0002761 , L0002762 , L0002763 , L0002764 , L0002765 , L0002766 , L0002767 , L0002768 , L0002769 , L0002770 , L0002771 , L0002772 , L0002773 , L0002774 , . . . ,			***		
*** DISCRETE CARTESIAN RECEPTOR POINTS ***			***		
*** CONC OF DPM IN MICROGRAMS/M**3			***		
X-COORD (M) Y-COORD (M) CONC			X-COORD (M) Y-COORD (M) CONC		
364290.00	3761540.00	26.46254	364300.00	3761540.00	28.01243
364450.00	3761540.00	4.96172	364460.00	3761540.00	4.36822

*** THE PERIOD ( 43848 HRS) AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP:									
LOADING ***									
*** MODEL OPTS: RegDFAULT CONC ELEV URBAN ADJ_U" PAGE 76									
INCLUDING SOURCE(S): L0002747 , L0002748 , L0002749 , L0002750 , L0002751 ,									
L0002752 , L0002753 , L0002754 , L0002755 , L0002756 , L0002757 , L0002758 , L0002759 ,									
L0002760 , L0002761 , L0002762 , L0002763 , L0002764 , L0002765 , L0002766 , L0002767 ,									
L0002768 , L0002769 , L0002770 , L0002771 , L0002772 , L0002773 , L0002774 , . . . ,									
*** DISCRETE CARTESIAN RECEPTOR POINTS ***									
** CONC OF DPM IN MICROGRAMS/M**3 **									
X-COORD (M)	Y-COORD (M)	CONC	X-COORD (M)	Y-COORD (M)	CONC				
-----									
364320.00	3761590.00	9.35467	364330.00	3761590.00	9.65285				
364340.00	3761590.00	9.76474	364350.00	3761590.00	9.69623				
364360.00	3761590.00	9.46957	364370.00	3761590.00	9.11616				
364390.00	3761590.00	8.16331	364400.00	3761590.00	7.62416				
364410.00	3761590.00	7.07468	364420.00	3761590.00	6.53102				
364430.00	3761590.00	6.00542	364440.00	3761590.00	5.50609				
*** AERMOD - VERSION 21112 *** ** C:\AERMOD\Venice\src									
*** AERMET - VERSION 16216 *** ** 10/01/21									
*** MODEL OPTS: RegDFAULT CONC ELEV URBAN ADJ_U" PAGE 76									
LOADING ***									
INCLUDING SOURCE(S): L0002747 , L0002748 , L0002749 , L0002750 , L0002751 ,									
L0002752 , L0002753 , L0002754 , L0002755 , L0002756 , L0002757 , L0002758 , L0002759 ,									
L0002760 , L0002761 , L0002762 , L0002763 , L0002764 , L0002765 , L0002766 , L0002767 ,									
L0002768 , L0002769 , L0002770 , L0002771 , L0002772 , L0002773 , L0002774 , . . . ,									
*** DISCRETE CARTESIAN RECEPTOR POINTS ***									
** CONC OF DPM IN MICROGRAMS/M**3 **									
X-COORD (M)	Y-COORD (M)	CONC	X-COORD (M)	Y-COORD (M)	CONC				
-----									
364320.00	3761590.00	9.35467	364330.00	3761590.00	9.65285				
364340.00	3761590.00	9.76474	364350.00	3761590.00	9.69623				
364360.00	3761590.00	9.46957	364370.00	3761590.00	9.11616				
364390.00	3761590.00	8.16331	364400.00	3761590.00	7.62416				
364410.00	3761590.00	7.07468	364420.00	3761590.00	6.53102				
364430.00	3761590.00	6.00542	364440.00	3761590.00	5.50609				

4TH HIGHEST VALUE IS 35.82639 AT ( 364260.00, 3761520.00, 2.66, 2.66, 0.00) DC  
5TH HIGHEST VALUE IS 35.52022 AT ( 364290.00, 3761430.00, 3.43, 3.43, 0.00) DC  
6TH HIGHEST VALUE IS 33.62034 AT ( 364280.00, 3761530.00, 2.36, 2.36, 0.00) DC  
7TH HIGHEST VALUE IS 32.00396 AT ( 364240.00, 3761510.00, 3.12, 3.12, 0.00) DC  
8TH HIGHEST VALUE IS 29.72385 AT ( 364310.00, 3761440.00, 3.07, 3.07, 0.00) DC  
9TH HIGHEST VALUE IS 29.24081 AT ( 364270.00, 3761530.00, 2.45, 2.45, 0.00) DC  
10TH HIGHEST VALUE IS 28.87918 AT ( 364250.00, 3761520.00, 2.82, 2.82, 0.00) DC

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

\*\*\* AERMOD - VERSION 21112 \*\*\* C:\AERMOD\Venice\Venice.isc  
\*\*\* AERMET - VERSION 16216 \*\*\*

\*\*\* MODELOPTs: RegDFAULT CONC ELEV URBAN ADJ\_U\*  
10/01/21

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

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

A Total of 0 Fatal Error Message(s)  
A Total of 2 Warning Message(s)  
A Total of 799 Informational Message(s)

A Total of 43848 Hours Were Processed

A Total of 455 Calm Hours Identified

A Total of 344 Missing Hours Identified ( 0.78 Percent)

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

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*  
ME W186 1571 MEOPEN: THRESH\_1MIN 1-min ASOS wind speed threshold used  
ME W187 1571 MEOPEN: ADJ\_U\* Option for Stable Low Winds used in AERMET

\*\*\*\*\* AERMOD Finishes Successfully \*\*\*\*\*

364450.00	3761590.00	5.03781	364460.00	3761590.00	4.60302
364300.00	3761600.00	6.84107	364310.00	3761600.00	7.34685
364320.00	3761600.00	7.77421	364330.00	3761600.00	8.08936
364340.00	3761600.00	8.27214	364350.00	3761600.00	8.31765
364360.00	3761600.00	8.23391	364370.00	3761600.00	8.03787
364380.00	3761600.00	7.75150	364410.00	3761600.00	6.57507
364420.00	3761600.00	6.13975	364430.00	3761600.00	5.70590
364440.00	3761600.00	5.28311	364450.00	3761600.00	4.87723
364460.00	3761600.00	4.49296	364320.00	3761610.00	6.52186
364330.00	3761610.00	6.82729	364340.00	3761610.00	7.04006
364350.00	3761610.00	7.15065	364360.00	3761610.00	7.15886
364370.00	3761610.00	7.07231	364380.00	3761610.00	6.90400
364390.00	3761610.00	6.66958	364410.00	3761610.00	6.06616
364420.00	3761610.00	5.72602	364430.00	3761610.00	5.37614
364440.00	3761610.00	5.02560	364450.00	3761610.00	4.68079
364340.00	3761620.00	6.02299	364350.00	3761620.00	6.16689
364360.00	3761620.00	6.23160	364370.00	3761620.00	6.21888
364380.00	3761620.00	6.13553	364390.00	3761620.00	5.99118
364400.00	3761620.00	5.79694	364410.00	3761620.00	5.56480
364420.00	3761620.00	5.30597	364430.00	3761620.00	5.03026
364440.00	3761620.00	4.74568	364350.00	3761630.00	5.33882
364360.00	3761630.00	5.43583	364370.00	3761630.00	5.47117
364380.00	3761630.00	5.44728	364390.00	3761630.00	5.36958
364400.00	3761630.00	5.24525	364410.00	3761630.00	5.08286
364420.00	3761630.00	4.89178	364430.00	3761630.00	4.67979
364440.00	3761630.00	4.45361	364370.00	3761640.00	4.81874
364380.00	3761640.00	4.83537	364390.00	3761640.00	4.80600
364400.00	3761640.00	4.73474	364410.00	3761640.00	4.62776
364420.00	3761640.00	4.49178	364430.00	3761640.00	4.33296
364380.00	3761650.00	4.29498	364390.00	3761650.00	4.29976
364400.00	3761650.00	4.26818	364410.00	3761650.00	4.20410
364420.00	3761650.00	4.11212	364430.00	3761650.00	3.84561
364410.00	3761660.00	3.81403	364420.00	3761660.00	3.75664

\*\*\* AERMOD - VERSION 21112 \*\*\* C:\AERMOD\Venice\Venice.isc  
\*\*\* AERMET - VERSION 16216 \*\*\*

\*\*\* CONC OF DPM IN MICROGRAMS/M\*\*3

\*\*\* 13:24:08

\*\*\* THE SUMMARY OF MAXIMUM PERIOD ( 43848 HRS) RESULTS \*\*\*

\*\*\* MODELOPTs: RegDFAULT CONC ELEV URBAN ADJ\_U\*

GROUP ID	AVERAGE CONC	RECEPTOR (XR, YR, ZELEV, ZHILL, ZFLAG) OF TYPE	GRID-ID
-----			

CONST	1ST HIGHEST VALUE IS	52.09906 AT ( 364380.00, 3761550.00, 2.24, 2.24, 0.00) DC
2ND HIGHEST VALUE IS	48.94329 AT ( 364370.00, 3761560.00, 2.09, 2.09, 0.00) DC	
3RD HIGHEST VALUE IS	42.59200 AT ( 364380.00, 3761560.00, 2.17, 2.17, 0.00) DC	
4TH HIGHEST VALUE IS	39.62995 AT ( 364400.00, 3761560.00, 2.28, 2.28, 0.00) DC	
5TH HIGHEST VALUE IS	39.32868 AT ( 364390.00, 3761560.00, 2.25, 2.25, 0.00) DC	
6TH HIGHEST VALUE IS	38.29698 AT ( 364300.00, 3761540.00, 2.11, 2.11, 0.00) DC	
7TH HIGHEST VALUE IS	36.92998 AT ( 364370.00, 3761570.00, 2.01, 2.01, 0.00) DC	
8TH HIGHEST VALUE IS	36.40265 AT ( 364260.00, 3761510.00, 2.80, 2.80, 0.00) DC	
9TH HIGHEST VALUE IS	34.56410 AT ( 364270.00, 3761520.00, 2.50, 2.50, 0.00) DC	
10TH HIGHEST VALUE IS	34.45569 AT ( 364310.00, 3761550.00, 1.92, 1.92, 0.00) DC	

LOADING	1ST HIGHEST VALUE IS	55.06133 AT ( 364260.00, 3761510.00, 2.80, 2.80, 0.00) DC
2ND HIGHEST VALUE IS	43.23253 AT ( 364270.00, 3761520.00, 2.50, 2.50, 0.00) DC	
3RD HIGHEST VALUE IS	42.22693 AT ( 364250.00, 3761510.00, 2.97, 2.97, 0.00) DC	



## Appendix D

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### MATES V Cancer Risk



Residential Air Toxics Cancer Risk  
Calculated from Model Data in Grid  
Cells

Cancer Risk [per million]



MATES Version is  
MATES V (2018)

Risk Calculation Type is  
Multi-Pathway

About Air Toxics Cancer Risk

Download PCIF



County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, INCREMENT P, Intermap, USGS, METN/NAASA, EPA, USDOA

# **EXHIBIT D**

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# LATHAM & WATKINS<sup>LLP</sup>

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April 21, 2020

Mr. Bradley Furuya  
 Los Angeles City Planning  
 Major Planning  
 221 N. Figueroa St., Suite 1350  
 Los Angeles, CA 90012  
 (213) 847-3642  
 bradley.furuya@lacity.org

Re: Reese Davidson Community Project: AB 1197 CEQA Exemption

Dear Mr. Furuya,

We represent Venice Community Housing Corporation (“VCHC”) and Hollywood Community Housing Corporation (“HCHC”), collectively the “Applicants” for the proposed Reese Davidson Community Project (“Project”), a 100-percent affordable housing, mixed-use development in the Venice Neighborhood in the City of Los Angeles. We request that this urgently needed project be processed utilizing the recently approved Assembly Bill 1197, which exempts from the requirements of CEQA certain activities and actions that are approved or carried out by the City related to the provision of supportive housing. As detailed below and in the attached AB 1197 Compliance Checklist, the Project meets all of the requirements of AB 1197 and is entitled to its statutory CEQA exemption.

## Project Summary

The Project is a new, supportive housing development that will provide affordable housing and services – including to formerly homeless individuals. Specifically, the Applicants propose a 100-percent affordable housing, mixed-use development on an approximately 115,674-square-foot site located in Venice (the “Project Site”). The Project Site is currently developed with a surface parking lot, the Pacific Electric Venice Short Line Bridge, and a two-story, 1,970-square-foot residential building containing four dwelling units. The surface parking lot and residential building are proposed to be demolished, and the bridge would be retained.

Once constructed, the Project will consist of two buildings that will provide a total of 140 residential units (a mix of artist live/work units, studio units, one-bedroom units, and two-bedroom units), which will consist of 136 affordable and permanent supportive housing units, along with four units for on-site property management staff, and 685 square feet of supportive services for low-income residents to be operated by a non-profit entity. The Project will reserve

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68 units (50 percent of the affordable units in the project) for the target population of low-income formerly homeless households. Supportive services will be available to all residents, and include, among other things, comprehensive psychosocial assessments; individualized case management plans; helping residents to access basic necessities; helping residents to obtain health services, as well as medication and treatment; and helping residents to obtain income and establish healthcare benefits.

The Project also will provide 3,155 square feet of community arts/community meeting space, as well as 3,065 square feet for retail/restaurant uses. Various residential amenities, including lobby space, laundry rooms, and common areas will be provided throughout the two proposed buildings. The Project's principal objectives include increasing the supply of affordable housing and lower-income households in the Venice community by providing permanent supportive housing and housing for low-income artists with a mix of artist live/work units, studio units, one-bedroom units, and two-bedroom units; and integrating affordable residential uses with supportive services, and community-serving uses, which include community arts and meeting spaces that are centrally located in the Venice community and in close proximity to public transit.

Parking for all residential and commercial uses will be provided on the Project Site. In addition, a minimum of 188 vehicular parking spaces will be provided in a public parking structure located onsite and will include both replacement parking for the existing surface parking spaces and additional parking to promote beach access for the general public. The public parking structure would be operated by the City's Department of Transportation.

### **The Project is Eligible for the Exemption Under AB 1197**

The Project is eligible for the statutory exemption from CEQA provided under AB 1197 because it (1) qualifies as a supportive housing project pursuant to Health and Safety Code Section 50675.14(b)(2); (2) meets the eligibility requirements of Government Code Section 65650 (AB 2162); and (3) is funded by County of Los Angeles Measure H Funds.

### ***Supportive Housing***

Health and Safety Code 50674.14(b)(2) defines "supportive housing" as "housing with no limit on length of stay, that is occupied by the target population, and that is linked to onsite or offsite services that assist the supportive housing resident in retaining the housing, improving their health status, and maximizing their ability to live and, when possible, work in the community." Health & Safety Code Section 50675.14(b)(3)(A) defines "target population" as "persons, including persons with disabilities, and families who are 'homeless' as that term is defined by Section 11302 of Title 42 of the United States Code[.]" Gov. Code Section 65651(3) requires that at least 25 percent of the units in the development must be restricted to residents in supportive housing who meet the criteria of the target population as defined in Health and Safety Code Section 50675.14(b)(3)(A), which includes are individuals and households who are homeless, or who were homeless when approved for tenancy in the supportive housing project in which they currently reside. The Project does not limit the length of stay for its residents, will

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reserve 68 of the 136 non-manager residential units (50 percent of the affordable units in the Project and above the 25 percent minimum requirement) for low-income formerly homeless members of the target population, and is linked to onsite supportive services. These low-income formerly homeless households meet the criteria of the target population, which includes individuals and households who are homeless, or who were homeless when approved for tenancy in the supportive housing project in which they currently reside, consistent with both the California and U.S. Department of Housing and Urban Development definitions of “homeless.” As such, the Project qualifies as a supportive housing project under Health and Safety Code 50674.14(b)(2).

***Gov. Code 65651 Checklist***

Government Code 65650 et. seq. sets out various requirements that a project must meet to be considered a “supportive housing” project. As set forth in Attachment A, Gov. Code 65651 Compliance Checklist, the Project meets all of the eligibility requirements of Government Code Section 65650.

***Funding***

On February 16, 2018, VCHC received a Measure H funding commitment letter from the Los Angeles County Department of Health Services Housing for Health Division (“Department”) for the Project. That letter is included as Attachment B. The funding commitment provides that the Department will enter into a contract with an approved Intensive Case Management Services (“ICMS”) provider at an estimated funding amount of up to \$367,200 per year, which will provide supportive services for 68 formerly homeless households in the Project. The term of the current supportive services funding commitment is through June 30, 2022, and includes the Department’s authority to exercise extension options.

Further, the Applicants will be pursuing funding from the No Place Like Home Program, the City’s Housing Impact Trust Fund, and the Building Homes and Jobs Trust Fund, depending on availability.

**Service Plan**

The supportive services to be provided by the Project will satisfy the requirements of the Measure H funding program. Such supportive services will include, among others: conducting comprehensive psychosocial assessments; developing individualized case management plans; helping residents to access temporary housing, food, clothes, and other basic necessities; helping residents to obtain health, mental health, and substance abuse services, as well as medication and treatment; and helping residents to obtain income and establish healthcare benefits. These supportive services will be provided by an approved ICMS provider and funded with Measure H funds, as described above. The proposed staffing for the services to be provided by the Project includes four case managers, one for every 17 supportive housing units, which satisfies the Measure H requirements for staffing (i.e., a required range of one case manager for every 15 households to one case manager for every 20 households).

LATHAM & WATKINS<sup>LLP</sup>**Conclusion**

As set forth in this letter and its attachments, the Project is consistent with AB 1197's requirement because it (1) qualifies as a supportive housing project pursuant to Health and Safety Code Section 50675.14(b)(2); (2) satisfies all of the eligibility requirements of Government Code Section 65650; and (3) has a Measure H funding commitment from the County. Therefore, the Project is consistent with AB 1197's requirements and is eligible for statutory CEQA exemption.

Please feel free to contact me at 213-891-7758 if you have any questions or need any additional information.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Duncan Joseph Moore", is positioned above the printed name.

Duncan Joseph Moore  
of LATHAM & WATKINS LLP

cc: Becky Dennison, VCHC  
Sarah Letts, HCHC  
Beth Gordie, Latham & Watkins LLP



**Attachment A**

**Reese-Davidson Project**  
**Gov. Code 65651 Compliance Checklist**

<b>Gov. Code Section 65651 Requirements</b>	<b>Project Compliance with Gov. Code Section 65651 Requirements</b>
Gov. Code Section 65651(1). Units within the development must be subject to a 55-year recorded affordability restriction.	All of the affordable units within the development will be subject to a covenant that reserves and maintains the units as restricted affordable for at least 55 years, consistent with this requirement. The covenant will be recorded after the Project closes on its construction financing, and before the certificate of occupancy is issued.
Gov. Code Section 65651(2). One hundred percent of the units, excluding managers' units, within the development must be dedicated to lower income households and must be receiving public funding to ensure affordability of the housing to lower income households. For purposes of this paragraph, "lower income households" has the same meaning as defined in Section 50079.5 of the Health and Safety Code.	The Project is 100-percent affordable housing and plans to provide a total of 140 residential units, which will consist of up to 136 affordable and permanent supportive housing units, along with up to four units for on-site property management staff. The 136 affordable units will meet the eligibility requirements for lower income households, as defined in Section 50079.5 of the Health and Safety Code, as these units will be restricted to those whose income does not exceed the qualifying limits for low, very low, and extremely low income households. 68 of the units will be reserved for formerly homeless households with an area median income (AMI) of 30 percent, while the remaining 68 affordable units will be reserved for households with an AMI of 60 percent. In the event the number of residential units change from the totals provided herein, the Project will still dedicate all of the units to lower income households, consistent with this requirement.

Gov. Code Section 65651 Requirements	Project Compliance with Gov. Code Section 65651 Requirements
<p>Gov. Code Section 65651(3). At least 25 percent of the units in the development must be restricted to residents in supportive housing who meet the criteria of the target population as defined in Health and Safety Code Section 50675.14(b)(3)(A), which includes individuals and households who are homeless, or who were homeless when approved for tenancy in the supportive housing project in which they currently reside.</p>	<p>The Project will reserve 68 of the 136 non-manager residential units (50 percent) for low-income formerly homeless households, which is above the minimum requirement of 25 percent of the total units. These formerly homeless households meet the criteria of the target population, which includes individuals and households who are homeless, or who were homeless when approved for tenancy in the supportive housing project in which they currently reside, consistent with both the California and U.S. Department of Housing and Urban Development definitions of “homeless.”<sup>1</sup> In the event that the number of units change from the totals provided herein, the Project will restrict at least 25 percent of the units to low-income formerly homeless households, consistent with this requirement.</p>
<p>Gov. Code Section 65651(4); Gov. Code Section 65652. The developer must provide the planning agency with a plan for providing supportive services and documentation demonstrating that supportive services will be provided onsite and describing those services.</p>	<p>The supportive services to be provided by the Project will satisfy the requirements of the Measure H funding program. Such supportive services will include, among others: conducting comprehensive psychosocial assessments; developing individualized case management plans; helping residents to access temporary housing, food, clothes, and other basic necessities; helping residents to obtain health, mental health, and substance abuse services, as well as medication and treatment; and helping residents to obtain income and establish healthcare benefits. These supportive services will be provided by an approved Intensive Case Management Services (“ICMS”) provider and funded with Measure H funds. The proposed staffing for the services to be provided by the Project includes four case managers, one for every 17 supportive housing units, which satisfies the Measure H requirements for staffing (i.e., a required range of one case manager for every 15 households to one case manager for every 20 households). This information will be provided to the planning agency, as required by Gov. Code Section 65651(4).</p>

<sup>1</sup> Health and Safety Code 50675.14(b)(2)-(3); 42 U.S.C. § 11302; HUD, [https://files.hudexchange.info/resources/documents/HomelessDefinition\\_RecordkeepingRequirementsandCriteria.pdf](https://files.hudexchange.info/resources/documents/HomelessDefinition_RecordkeepingRequirementsandCriteria.pdf), March 2019.

<b>Gov. Code Section 65651 Requirements</b>	<b>Project Compliance with Gov. Code Section 65651 Requirements</b>
<p>Gov. Code Section 65651(5). At least 3 percent of the total nonresidential floor area must be provided for onsite supportive services that are limited to tenant use, including, but not limited to, community rooms, case management offices, computer rooms, and community kitchens.</p>	<p>The total nonresidential floor area of the Project is estimated to be 6,905 square feet, with 685 square feet dedicated to onsite supportive services that are limited to tenant use (i.e., 9.9 percent of the total nonresidential floor area). This amount is above the 3 percent of total nonresidential floor area required under Section 65651(5). The planned 685 square feet of supportive services will be limited to tenant use, and include areas dedicated to conducting tenant assessments and helping tenants obtain access to other benefits and services.</p> <p>The Project also plans to include 3,155 square feet of community arts/community meeting spaces, which are anticipated to be available to both the Project's tenants and the public. In the event any of the square footage allocations change from the calculations provided herein, the Project's onsite supportive services will stay above the 3 percent nonresidential floor area threshold consistent with this requirement.</p>
<p>Gov. Code Section 65651(6). The developer must replace any dwelling units on the site of the supportive housing development in the manner provided in paragraph (3) of subdivision (c) of Section 65915.</p>	<p>The Project Site is currently developed with a two-story, 1,970-square-foot residential building containing four dwelling units deemed "affordable" by the City at their current rent levels. The Project will restrict all units to low, very low, and extremely low income households, and provide at least four units of equivalent size to households in the same or lower income category as the four households currently on the Project Site.</p>
<p>Gov. Code Section 65651(7). Units within the development, excluding managers' units, must include at least one bathroom and a kitchen or other cooking facilities, including, at a minimum, a stovetop, a sink, and a refrigerator.</p>	<p>Each unit within the Project will include at least one bathroom and a kitchen or other cooking facilities, including, at a minimum, a stovetop, a sink, and a refrigerator.</p>

**Attachment B**

**(see attached)**



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February 16, 2018

Ms. Becky Dennison  
Executive Director  
Venice Community Housing Corporation  
720 Rose Ave  
Los Angeles, CA 90291

### Re: Reese-Davidson Community Project

Dear Ms. Dennison:

The Los Angeles County Department of Health Services (County) Housing for Health (HFH) division is partnering with affordable housing developments to provide affordable housing linked to appropriate services for DHS patients who are homeless, who have a chronic illness or physical disability or are a high utilizer of DHS services. DHS greatly appreciates the collaboration with Venice Community Housing Corporation (VCHC) for the purpose of delivering supportive housing to prospective DHS tenants. We look forward to assisting in the development and successful operation of the proposed development.

### Project Description

It is DHS' intention to assist VCHC with all 68 PSH units in the Reese-Davidson Community project with Intensive Case Management Services (ICMS) support. These units will be reserved for homeless and chronically homeless individuals.

The project will be located at 204 N. Venice Boulevard in the Venice neighborhood of Los Angeles. This project is a new construction of rental apartments. The Reese-Davidson Community project will be designed to complement the neighborhood while providing a high quality and safe environment for its residents.

There will be a total of 140 units, including 68 PSH units for chronically homeless persons, 68 units reserved for low income households, and 4 units reserved for on-site management. Barker Management will provide onsite property management. This project will also include recreation rooms, laundry and open space for tenants, as well as small-scale retail, a community arts center, and street level garden/green space.

The Reese-Davidson Community project will begin construction in December of 2019 and the Certificate of Occupancy is expected in summer 2021.

### Support Services Commitment

The County intends to provide supportive services for up to 68 homeless DHS patients at the Reese-Davidson Community project. The County shall enter into contract with an approved Intensive Case Management Services (ICMS) provider at an estimated funding amount of up to \$367,200 per year. The County, the ICMS provider, and VCHC will collaborate to ensure tenants receive the support they need to remain housed and stable, including attending and/or convening periodic meetings with partners to problem-solve around tenant, building, and community issues. DHS will also provide in-kind clinical services on-site and through referral to primary care homes to ensure that each tenant receives high quality medical care.

### Rental Subsidy Commitment

VCHC will apply for an allocation of Project Based Section 8 vouchers from the Housing Authority of the City of Los Angeles in December 2019. However, in the event they are unable to secure all of the necessary Project Based Section 8

vouchers for the Reese-Davidson Community project, it is DHS' intention to assist VCHC to receive the Flexible Housing Subsidy Pool (FHSP) rental subsidy for the 68 PSH units.

Should VCHC require FHSP rental subsidies, unit rent will be set according to the Housing Authority of the City of Los Angeles' Fair Market Rents at the time of lease up. Residents will pay thirty percent (30%) of their certified income towards rent, and the FHSP subsidy will cover total rent minus tenant rent contribution.

Upon receiving the various capital funding commitments necessary to ensure project feasibility, DHS will, through our established funding approval and contracting procedures, engage in contract negotiations with appropriate parties to provide the services and funding described above.

The term of current DHS supportive services agreement is through June 30, 2022, inclusive of DHS' authority to exercise extension options and the term of the Brilliant Corners rental subsidy agreement is fifteen years. In all likelihood, barring unforeseen financial difficulties for the County, and assuming the project continues to operate in good standing, contracts for this project would be renewed at the end of the contract term to ensure that formerly homeless tenants of the project continue to receive high quality housing.

Once again, we are extremely enthusiastic about this project and happy to be partnering with Venice Community Housing Corporation.

Sincerely,

A handwritten signature in blue ink, appearing to read "Marc Trotz".

Marc Trotz, Director  
Housing for Health

# **EXHIBIT E**



## LATHAM & WATKINS<sup>LLP</sup>

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January 27, 2021

Jordann Turner  
Deputy Advisory Agency and City Hearing Officer  
City of Los Angeles Department of City Planning  
221 N. Figueroa St., Suite 1350  
Los Angeles, CA 90012

Re: Reese Davidson Community: VTT-82288; CPC-2018-7344-GPAJ-VZCJ-HD-SP-SPP-CDP-MEL-WDI-SPR-PHP; ENV-2018-6667-SE

Dear Ms. Turner:

We write on behalf of our clients, Hollywood Community Housing Corporation and Venice Community Housing, in support of the Reese Davidson Community Project and in response to those opposed to this needed supportive housing project on an underutilized City-owned parking lot. We appreciate the City's consideration of this Project and applaud the City's efforts to utilize City-owned properties for developing affordable housing that our region desperately needs. These efforts are particularly notable in light of the current affordable housing crisis in Los Angeles and COVID-19 pandemic, which have severely impacted the housing security of many Angelenos and jeopardized the ability of the lower-income community to continue to prosper in Venice.

The Project is proposed on approximately two and a half acres of City-owned parking lots located at 2102 - 2120 S. Pacific Avenue, 116-302 E. North Venice Boulevard, 2106-2116 S. Canal Street, and 319 E. South Venice Boulevard (the "Project Site"). In place of these surface parking lots will be 136 affordable and permanent supportive housing units, four property management units, on-site social services, open space, a community arts center, community meeting rooms, small-scale retail, resident parking, and replacement public parking. Lush landscaping and artist-serving uses will activate the Venice Canals area and the pedestrian experience for the surrounding residential and small-scale retail and commercial uses. This is a remarkable example of land recycling and putting a property to a better, more beneficial use. Further, while possibly unnecessary in light of shifting transportation patterns, the Project will provide more than the number of existing public parking spaces.

A small group of individuals are opposed to our clients' efforts to provide support and homes for our City's neediest residents. In an effort to delay the Project, they argue that the Project does not qualify for a statutory exemption under the California Environmental Quality Act. These claims are erroneous, were addressed in our letter dated April 21, 2020, enclosed as **Exhibit A**, and are merely an excuse to try and derail this Project.

The City should not be deterred. The Project is exempt from CEQA. The Project fully satisfies each of AB 1197's requirements. Below is a further response to these baseless arguments.

**A. AB 1197's Statutory Exemption Is Clear—Permanent Supportive Housing Projects Do Not Require CEQA Review**

The Legislature adopted AB 1197 as an urgency measure to facilitate the construction of supportive housing in the City of Los Angeles. The author of the bill explained that "AB 1197 responds to the homeless crisis in Los Angeles by removing barriers that slow the construction of supportive housing and emergency shelters for homeless families and individuals in the City of Los Angeles . . . Given this year's homeless count increases in Los Angeles, AB 1197 is a timely tool that can be used to continue to develop housing and move Angelenos suffering from homelessness off the streets and into safe and decent housing." (Assemb. Floor Analysis at 1–2 (Cal. Sept. 10, 2019), Assemb. B. 1197, 2019-2020 Leg., Reg. Sess. (Cal. 2019) (passed).) The law's sole and critical purpose is to expedite supportive housing and emergency shelter projects in response to our City's homeless crisis.

AB 1197, codified at Public Resources Code Section 21080.27, is a statutory exemption. Therefore, the only question the City must ask is whether a project fits within its terms. This is in stark contrast to categorical exemptions, which are more limited. Categorical exemptions require an additional step that asks whether an exception to the exemption may apply to defeat use of the exemption. No second step is required here. The California Supreme Court explained, "statutory exemptions have in common only this: the Legislature determined that each promoted an interest important enough to justify forgoing the benefits of environmental review." (*Napa Valley Wine Train, Inc. v. Public Utilities Com.* (1990) 50 Cal. 3d 370, 382.) AB 1197 specifically exempts from CEQA "any activity approved by or carried out by the City of Los Angeles in furtherance of providing emergency shelters or supportive housing in the City of Los Angeles." (Pub. Res. Code Sec. 21080.27(b)(1).)

On September 26, 2019, the City of Los Angeles Department of City Planning issued a memorandum ("DCP Implementation Memo"), **Exhibit B**, summarizing how the City would implement the exemption. The City's memorandum explains that the exemption covers all discretionary planning entitlements a supportive housing use requires. This includes any necessary Zone Change, General Plan Amendment, Conditional Use Permit, or other required land use action. In other words, the City's approval of the land use entitlements for a supportive housing project that meets the eligibility requirements of AB 1197, is exempt from CEQA.

**B. The Project Satisfies Each of AB 1197's Requirements**

The Project is consistent with every eligibility requirement in AB 1197. Therefore, it is statutorily exempt from CEQA. Opponents argue that the Project does not satisfy the eligibility requirements for the exemption due to the Project's retail, commercial, and parking uses, and because the Project Site is not currently zoned for multifamily uses. Opponents are wrong on each count.

## **1. The Project's Mix Of Uses Are Consistent With AB 1197**

Opponents claim that the Project's nonresidential square footage renders it ineligible for the exemption. This is wrong. Opponents read in a limitation that does not exist.

AB 1197 applies to all actions "in furtherance of providing emergency shelters or supportive housing." AB 1197 does not preclude nonresidential floor area from homeless housing projects.

The definition of "supportive housing," only requires compliance with the eligibility requirements of Government Code, Title 7, Division 1, Chapter 3, Article II. This includes that: (i) 100% of the units (excluding managers units) be restricted to lower income households; and (ii) developments of more than 20 units include at least 3% of the total nonresidential floor area for onsite supportive services. (Cal. Gov. Code Sec. 65651.) Thus, the definition of supportive housing itself contemplates nonresidential uses—onsite supportive services and others.

Here, the nonresidential floor area for the Project is 6,905 square feet. The Project's total floor area is 104,140 square feet. Of the approximately 6,900 square feet of nonresidential uses, nearly ten percent, or 685 square feet is dedicated to onsite supportive services limited to tenant use.<sup>1</sup> This far exceeds AB 1197's requirement that a minimum of three percent of nonresidential uses be devoted to supportive services. The supportive services available to tenants will include, among other things, comprehensive psychosocial assessments, individualized case management plans, assistance with accessing basic necessities, help in obtaining health services, as well as medication and treatment, and assistance with obtaining income and establish healthcare benefits.

The Project's other nonresidential square footage is devoted to 255 sf of retail, 810 sf of restaurant, and 3,155 sf of art studio space. While not directly allocated for social services, the Project's nominal 6,220 square feet of space allocated to retail, restaurant, and art spaces is an important component of the supportive housing project. These uses serve both tenants and the public and promote the Project's integration within the community. These uses are complementary to the primary supportive housing uses and are "in furtherance of providing emergency shelters or supportive housing in the City of Los Angeles."

## **2. The Project's Replacement of the City's Public Parking Spaces Is Consistent with AB 1197**

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<sup>1</sup> Even if the calculation of total nonresidential floor area included covered alcoves (1,750 sf) and building overhang areas (4,366 sf) associated with nonresidential uses, the 685 sf dedicated to supportive services would still represent 4.8% of the total nonresidential floor area, which is consistent the 3% minimum requirement. This analysis conservatively assumes that 50% of the ground floor covered alcoves and building overhang areas would be assigned to nonresidential uses. However, this percentage would be considerably less if assigned by adjacent use.

LATHAM & WATKINS LLP

The Project's public parking also does not render it ineligible for the exemption. The Project's public parking spaces are intended to replace the existing public parking spaces on the Project Site, which is necessary in order to provide supportive housing on the Project Site. The Project Site currently contains a City-operated surface parking lot with 196 public parking spaces. Due to City and Coastal Act requirements, the Project is required to provide, at minimum, 196 replacement parking spaces. AB 1197 also does not preclude development of other uses as part of an exempt project, and the parking amount is not limited by the requirement that 3% of the total nonresidential floor area be dedicated to onsite supportive services because parking areas, associated driveways and ramps are not included within the City's definition of "Floor Area." (Los Angeles Municipal Code Sec. 12.03.) The Project's proximity to the beach also implicates numerous policies regarding additional public parking for enhanced coastal access that must be met in order for the site to be developed.

For example, Policy II. A. 2 of the Venice Local Coastal Program Land Use Plan provides, "[t]he construction of new public parking facilities should be implemented, as well as maximizing the use of existing ones by restriping existing parking lots or converting them to multi-level structures where consistent with other Coastal Act policies." In addition, Policy II.A.3 provides parking requirements for all new developments, noting that public beach parking lots shall not be used to satisfy the parking requirements of the policy. Numerous other policies are directed at protecting existing public parking and increasing parking facilities, including Policies II.A.1<sup>2</sup> and II.A.9. The Venice Community Plan "Parking" section states that it "encourages the development of City-owned parking facilities in the community so that an adequate supply of parking can be provided to meet the demand for both year-long and seasonal peaks." Finally, California Coastal Act Section 30212.5 provides that "[w]herever appropriate and feasible, public facilities, including parking areas or facilities, shall be distributed throughout an area so as to mitigate against the impacts, social and otherwise, of overcrowding or overuse by the public of any single area." Accordingly, the City's Request for Proposals for the Project Site specified that any affordable housing development on the site would be required to replace the existing public parking spaces as part of its future parking program.

AB 1197's sole purpose is to facilitate development of emergency and supportive housing. Each supportive housing project must be developed within the constraints of its site. Here, the Project Site includes existing public parking that must be replaced. Similar to the required residential parking, replacement public parking also must be provided to develop supportive housing on the Project Site. Therefore, all of the Project's parking is in furtherance of providing supportive housing, and is consistent with the AB 1197 exemption.

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<sup>2</sup> "General. It is the policy of the City to provide increased parking opportunities for both visitors and residents of Venice, and improve summer weekend conditions with respect to Venice Beach parking and traffic control. A comprehensive package of parking measures and strategies that addresses the needs and balances the competing demands of residents and beach visitors is proposed. Parking facilities shall be increased, subject to the availability of funding, to meet existing unmet needs for residents and beach visitors in order to improve public access opportunities and reduce conflicts between residential and beach visitor parking. Parking facilities for beach overload parking shall be located outside of the Beach Impact Zone. The development of parking facilities shall be consistent with Coastal Act policies." (Policy II.A.1.)

**C. The Project Meets the Definition of Supportive Housing**

The Project opponents suggest that the Project Site needs to be zoned multifamily for the AB 1197 exemption to apply. They are wrong. To qualify as supportive housing under AB 1197, a project must meet the definition of supportive housing in Health and Safety Code Section 50675.14 as well as the eligibility requirements in Government Code Sections 65650 - 65656. Government Code Section 65650 is consistent with AB 1197, as it provides that supportive housing is defined in Health and Safety Code Section 50675.14. As explained in our letter enclosed as Exhibit A, the Project meets the definition of supportive housing.

Government Code Section 65651(a) explains that “[s]upportive housing shall be a use by right in zones where multifamily and mixed uses are permitted, including nonresidential zones permitting multifamily uses, if the proposed housing development satisfies all of the following requirements.” This section is followed by a checklist of eligibility requirements.

The opponents argue that the Project is not consistent with Government Code Section 65651(a) because the underlying Open Space zone does not currently permit multifamily uses. However, the opponents are misreading the statute. AB 1197 does not require that the Project be located in a multifamily zone, but rather that it meet the eligibility requirements within Section 65651. The checklist of requirements under Government Code Section 65651(a) sets forth the eligibility requirements for the AB 1197 exemption. The language allowing supportive housing to be a by right use in multifamily zones is simply a benefit that projects can obtain by complying with the requirements of that Government Code section. Here, the Project is not seeking a by right determination. The Project is merely seeking a CEQA exemption. Therefore, the underlying zoning is irrelevant to the AB 1197 exemption determination.

Further, as explained in Exhibit A, the Project satisfies every eligibility requirement of Government Code Section 65651.

**D. The Project Satisfies All Funding Requirements**

The Project satisfies each of AB 1197’s funding requirements.

AB 1197 requires that the supportive housing be funded in whole or in part by The No Place Like Home Program, the Building Homes and Jobs Trust Fund, Measure H sales tax proceeds, general bond obligations issued pursuant to Proposition HHH, or the City of Los Angeles Housing Impact Trust Fund.

To demonstrate funding, the City requires an approved letter of funding commitment from the applicable funding agency as part of the application for the exemption. The letter must indicate that the project has been awarded funds from an eligible funding source. That was done here.

Venice Community Housing Corporation submitted a Measure H funding commitment letter from the Los Angeles Department of Health Services Housing for Health Division. (See Attachment B to Exhibit A.) The funding commitment states that the Department will enter into a contract with an approved Intensive Case Management Services provider at an estimated

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funding amount of up to \$367,200 per year. This funding will provide supportive services for 68 formerly homeless households in the Project. Measure H sales tax proceeds are also an eligible funding source under Public Resources Code Section 21080.27(a)(3)(C). Accordingly, the funding sources comply with AB 1197.

**E. Conclusion**

At every step of the City's process, our clients have diligently demonstrated compliance with AB 1197's requirements. Further, as detailed here and in prior correspondence, the Project is statutorily exempt from CEQA.

In consideration of the urgent need for affordable housing in the City, we appreciate your consideration of our responses, and a prompt approval of the requested entitlements.

Please do not hesitate to contact us if you have any additional questions.

Very truly yours,



Beth Gordie  
of LATHAM & WATKINS LLP

Enclosures

cc: Councilmember Mike Bonin  
Sarah Letts, Hollywood Community Housing Corporation  
Becky Dennison, Venice Community Housing

# **EXHIBIT A**



April 21, 2020

Mr. Bradley Furuya  
Los Angeles City Planning  
Major Planning  
221 N. Figueroa St., Suite 1350  
Los Angeles, CA 90012  
(213) 847-3642  
bradley.furuya@lacity.org

Re: Reese Davidson Community Project: AB 1197 CEQA Exemption

Dear Mr. Furuya,

We represent Venice Community Housing Corporation (“VCHC”) and Hollywood Community Housing Corporation (“HCHC”), collectively the “Applicants” for the proposed Reese Davidson Community Project (“Project”), a 100-percent affordable housing, mixed-use development in the Venice Neighborhood in the City of Los Angeles. We request that this urgently needed project be processed utilizing the recently approved Assembly Bill 1197, which exempts from the requirements of CEQA certain activities and actions that are approved or carried out by the City related to the provision of supportive housing. As detailed below and in the attached AB 1197 Compliance Checklist, the Project meets all of the requirements of AB 1197 and is entitled to its statutory CEQA exemption.

### **Project Summary**

The Project is a new, supportive housing development that will provide affordable housing and services – including to formerly homeless individuals. Specifically, the Applicants propose a 100-percent affordable housing, mixed-use development on an approximately 115,674-square-foot site located in Venice (the “Project Site”). The Project Site is currently developed with a surface parking lot, the Pacific Electric Venice Short Line Bridge, and a two-story, 1,970-square-foot residential building containing four dwelling units. The surface parking lot and residential building are proposed to be demolished, and the bridge would be retained.

Once constructed, the Project will consist of two buildings that will provide a total of 140 residential units (a mix of artist live/work units, studio units, one-bedroom units, and two-bedroom units), which will consist of 136 affordable and permanent supportive housing units, along with four units for on-site property management staff, and 685 square feet of supportive services for low-income residents to be operated by a non-profit entity. The Project will reserve

68 units (50 percent of the affordable units in the project) for the target population of low-income formerly homeless households. Supportive services will be available to all residents, and include, among other things, comprehensive psychosocial assessments; individualized case management plans; helping residents to access basic necessities; helping residents to obtain health services, as well as medication and treatment; and helping residents to obtain income and establish healthcare benefits.

The Project also will provide 3,155 square feet of community arts/community meeting space, as well as 3,065 square feet for retail/restaurant uses. Various residential amenities, including lobby space, laundry rooms, and common areas will be provided throughout the two proposed buildings. The Project's principal objectives include increasing the supply of affordable housing and lower-income households in the Venice community by providing permanent supportive housing and housing for low-income artists with a mix of artist live/work units, studio units, one-bedroom units, and two-bedroom units; and integrating affordable residential uses with supportive services, and community-serving uses, which include community arts and meeting spaces that are centrally located in the Venice community and in close proximity to public transit.

Parking for all residential and commercial uses will be provided on the Project Site. In addition, a minimum of 188 vehicular parking spaces will be provided in a public parking structure located onsite and will include both replacement parking for the existing surface parking spaces and additional parking to promote beach access for the general public. The public parking structure would be operated by the City's Department of Transportation.

### **The Project is Eligible for the Exemption Under AB 1197**

The Project is eligible for the statutory exemption from CEQA provided under AB 1197 because it (1) qualifies as a supportive housing project pursuant to Health and Safety Code Section 50675.14(b)(2); (2) meets the eligibility requirements of Government Code Section 65650 (AB 2162); and (3) is funded by County of Los Angeles Measure H Funds.

### ***Supportive Housing***

Health and Safety Code 50674.14(b)(2) defines "supportive housing" as "housing with no limit on length of stay, that is occupied by the target population, and that is linked to onsite or offsite services that assist the supportive housing resident in retaining the housing, improving their health status, and maximizing their ability to live and, when possible, work in the community." Health & Safety Code Section 50675.14(b)(3)(A) defines "target population" as "persons, including persons with disabilities, and families who are 'homeless' as that term is defined by Section 11302 of Title 42 of the United States Code[.]" Gov. Code Section 65651(3) requires that at least 25 percent of the units in the development must be restricted to residents in supportive housing who meet the criteria of the target population as defined in Health and Safety Code Section 50675.14(b)(3)(A), which includes are individuals and households who are homeless, or who were homeless when approved for tenancy in the supportive housing project in which they currently reside. The Project does not limit the length of stay for its residents, will

reserve 68 of the 136 non-manager residential units (50 percent of the affordable units in the Project and above the 25 percent minimum requirement) for low-income formerly homeless members of the target population, and is linked to onsite supportive services. These low-income formerly homeless households meet the criteria of the target population, which includes individuals and households who are homeless, or who were homeless when approved for tenancy in the supportive housing project in which they currently reside, consistent with both the California and U.S. Department of Housing and Urban Development definitions of “homeless.” As such, the Project qualifies as a supportive housing project under Health and Safety Code 50674.14(b)(2).

### ***Gov. Code 65651 Checklist***

Government Code 65650 et. seq. sets out various requirements that a project must meet to be considered a “supportive housing” project. As set forth in Attachment A, Gov. Code 65651 Compliance Checklist, the Project meets all of the eligibility requirements of Government Code Section 65650.

### ***Funding***

On February 16, 2018, VCHC received a Measure H funding commitment letter from the Los Angeles County Department of Health Services Housing for Health Division (“Department”) for the Project. That letter is included as Attachment B. The funding commitment provides that the Department will enter into a contract with an approved Intensive Case Management Services (“ICMS”) provider at an estimated funding amount of up to \$367,200 per year, which will provide supportive services for 68 formerly homeless households in the Project. The term of the current supportive services funding commitment is through June 30, 2022, and includes the Department’s authority to exercise extension options.

Further, the Applicants will be pursuing funding from the No Place Like Home Program, the City’s Housing Impact Trust Fund, and the Building Homes and Jobs Trust Fund, depending on availability.

### **Service Plan**

The supportive services to be provided by the Project will satisfy the requirements of the Measure H funding program. Such supportive services will include, among others: conducting comprehensive psychosocial assessments; developing individualized case management plans; helping residents to access temporary housing, food, clothes, and other basic necessities; helping residents to obtain health, mental health, and substance abuse services, as well as medication and treatment; and helping residents to obtain income and establish healthcare benefits. These supportive services will be provided by an approved ICMS provider and funded with Measure H funds, as described above. The proposed staffing for the services to be provided by the Project includes four case managers, one for every 17 supportive housing units, which satisfies the Measure H requirements for staffing (i.e., a required range of one case manager for every 15 households to one case manager for every 20 households).

## **Conclusion**

As set forth in this letter and its attachments, the Project is consistent with AB 1197's requirement because it (1) qualifies as a supportive housing project pursuant to Health and Safety Code Section 50675.14(b)(2); (2) satisfies all of the eligibility requirements of Government Code Section 65650; and (3) has a Measure H funding commitment from the County. Therefore, the Project is consistent with AB 1197's requirements and is eligible for statutory CEQA exemption.

Please feel free to contact me at 213-891-7758 if you have any questions or need any additional information.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Duncan Joseph Moore".

Duncan Joseph Moore  
of LATHAM & WATKINS LLP

cc: Becky Dennison, VCHC  
Sarah Letts, HCHC  
Beth Gordie, Latham & Watkins LLP

## Attachment A

### Reese-Davidson Project Gov. Code 65651 Compliance Checklist

Gov. Code Section 65651 Requirements	Project Compliance with Gov. Code Section 65651 Requirements
Gov. Code Section 65651(1). Units within the development must be subject to a 55-year recorded affordability restriction.	All of the affordable units within the development will be subject to a covenant that reserves and maintains the units as restricted affordable for at least 55 years, consistent with this requirement. The covenant will be recorded after the Project closes on its construction financing, and before the certificate of occupancy is issued.
Gov. Code Section 65651(2). One hundred percent of the units, excluding managers' units, within the development must be dedicated to lower income households and must be receiving public funding to ensure affordability of the housing to lower income households. For purposes of this paragraph, "lower income households" has the same meaning as defined in Section 50079.5 of the Health and Safety Code.	The Project is 100-percent affordable housing and plans to provide a total of 140 residential units, which will consist of up to 136 affordable and permanent supportive housing units, along with up to four units for on-site property management staff. The 136 affordable units will meet the eligibility requirements for lower income households, as defined in Section 50079.5 of the Health and Safety Code, as these units will be restricted to those whose income does not exceed the qualifying limits for low, very low, and extremely low income households. 68 of the units will be reserved for formerly homeless households with an area median income (AMI) of 30 percent, while the remaining 68 affordable units will be reserved for households with an AMI of 60 percent. In the event the number of residential units change from the totals provided herein, the Project will still dedicate all of the units to lower income households, consistent with this requirement.

<b>Gov. Code Section 65651 Requirements</b>	<b>Project Compliance with Gov. Code Section 65651 Requirements</b>
<p>Gov. Code Section 65651(3). At least 25 percent of the units in the development must be restricted to residents in supportive housing who meet the criteria of the target population as defined in Health and Safety Code Section 50675.14(b)(3)(A), which includes individuals and households who are homeless, or who were homeless when approved for tenancy in the supportive housing project in which they currently reside.</p>	<p>The Project will reserve 68 of the 136 non-manager residential units (50 percent) for low-income formerly homeless households, which is above the minimum requirement of 25 percent of the total units. These formerly homeless households meet the criteria of the target population, which includes individuals and households who are homeless, or who were homeless when approved for tenancy in the supportive housing project in which they currently reside, consistent with both the California and U.S. Department of Housing and Urban Development definitions of “homeless.”<sup>1</sup> In the event that the number of units change from the totals provided herein, the Project will restrict at least 25 percent of the units to low-income formerly homeless households, consistent with this requirement.</p>
<p>Gov. Code Section 65651(4); Gov. Code Section 65652. The developer must provide the planning agency with a plan for providing supportive services and documentation demonstrating that supportive services will be provided onsite and describing those services.</p>	<p>The supportive services to be provided by the Project will satisfy the requirements of the Measure H funding program. Such supportive services will include, among others: conducting comprehensive psychosocial assessments; developing individualized case management plans; helping residents to access temporary housing, food, clothes, and other basic necessities; helping residents to obtain health, mental health, and substance abuse services, as well as medication and treatment; and helping residents to obtain income and establish healthcare benefits. These supportive services will be provided by an approved Intensive Case Management Services (“ICMS”) provider and funded with Measure H funds. The proposed staffing for the services to be provided by the Project includes four case managers, one for every 17 supportive housing units, which satisfies the Measure H requirements for staffing (i.e., a required range of one case manager for every 15 households to one case manager for every 20 households). This information will be provided to the planning agency, as required by Gov. Code Section 65651(4).</p>

<sup>1</sup> Health and Safety Code 50675.14(b)(2)-(3); 42 U.S.C. § 11302; HUD, [https://files.hudexchange.info/resources/documents/HomelessDefinition\\_RecordkeepingRequirementsandCriteria.pdf](https://files.hudexchange.info/resources/documents/HomelessDefinition_RecordkeepingRequirementsandCriteria.pdf), March 2019.

<b>Gov. Code Section 65651 Requirements</b>	<b>Project Compliance with Gov. Code Section 65651 Requirements</b>
<p>Gov. Code Section 65651(5). At least 3 percent of the total nonresidential floor area must be provided for onsite supportive services that are limited to tenant use, including, but not limited to, community rooms, case management offices, computer rooms, and community kitchens.</p>	<p>The total nonresidential floor area of the Project is estimated to be 6,905 square feet, with 685 square feet dedicated to onsite supportive services that are limited to tenant use (i.e., 9.9 percent of the total nonresidential floor area). This amount is above the 3 percent of total nonresidential floor area required under Section 65651(5). The planned 685 square feet of supportive services will be limited to tenant use, and include areas dedicated to conducting tenant assessments and helping tenants obtain access to other benefits and services.</p> <p>The Project also plans to include 3,155 square feet of community arts/community meeting spaces, which are anticipated to be available to both the Project's tenants and the public. In the event any of the square footage allocations change from the calculations provided herein, the Project's onsite supportive services will stay above the 3 percent nonresidential floor area threshold consistent with this requirement.</p>
<p>Gov. Code Section 65651(6). The developer must replace any dwelling units on the site of the supportive housing development in the manner provided in paragraph (3) of subdivision (c) of Section 65915.</p>	<p>The Project Site is currently developed with a two-story, 1,970-square-foot residential building containing four dwelling units deemed "affordable" by the City at their current rent levels. The Project will restrict all units to low, very low, and extremely low income households, and provide at least four units of equivalent size to households in the same or lower income category as the four households currently on the Project Site.</p>
<p>Gov. Code Section 65651(7). Units within the development, excluding managers' units, must include at least one bathroom and a kitchen or other cooking facilities, including, at a minimum, a stovetop, a sink, and a refrigerator.</p>	<p>Each unit within the Project will include at least one bathroom and a kitchen or other cooking facilities, including, at a minimum, a stovetop, a sink, and a refrigerator.</p>



**Attachment B**

**(see attached)**



Los Angeles County  
Board of Supervisors

Hilda L. Solis  
First District

Mark Ridley-Thomas  
Second District

Sheila Kuehl  
Third District

Janice Hahn  
Fourth District

Kathryn Barger  
Fifth District

Fred Leaf  
Interim Director

Hal F. Yee, Jr., M.D., Ph.D.  
Chief Medical Officer

Christina R. Ghaly, M.D.  
Chief Operating Officer

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February 16, 2018

Ms. Becky Dennison  
Executive Director  
Venice Community Housing Corporation  
720 Rose Ave  
Los Angeles, CA 90291

### **Re: Reese-Davidson Community Project**

Dear Ms. Dennison:

The Los Angeles County Department of Health Services (County) Housing for Health (HFH) division is partnering with affordable housing developments to provide affordable housing linked to appropriate services for DHS patients who are homeless, who have a chronic illness or physical disability or are a high utilizer of DHS services. DHS greatly appreciates the collaboration with Venice Community Housing Corporation (VCHC) for the purpose of delivering supportive housing to prospective DHS tenants. We look forward to assisting in the development and successful operation of the proposed development.

### **Project Description**

It is DHS' intention to assist VCHC with all 68 PSH units in the Reese-Davidson Community project with Intensive Case Management Services (ICMS) support. These units will be reserved for homeless and chronically homeless individuals.

The project will be located at 204 N. Venice Boulevard in the Venice neighborhood of Los Angeles. This project is a new construction of rental apartments. The Reese-Davidson Community project will be designed to complement the neighborhood while providing a high quality and safe environment for its residents.

There will be a total of 140 units, including 68 PSH units for chronically homeless persons, 68 units reserved for low income households, and 4 units reserved for on-site management. Barker Management will provide onsite property management. This project will also include recreation rooms, laundry and open space for tenants, as well as small-scale retail, a community arts center, and street level garden/green space.

The Reese-Davidson Community project will begin construction in December of 2019 and the Certificate of Occupancy is expected in summer 2021.

### **Support Services Commitment**

The County intends to provide supportive services for up to 68 homeless DHS patients at the Reese-Davidson Community project. The County shall enter into contract with an approved Intensive Case Management Services (ICMS) provider at an estimated funding amount of up to \$367,200 per year. The County, the ICMS provider, and VCHC will collaborate to ensure tenants receive the support they need to remain housed and stable, including attending and/or convening periodic meetings with partners to problem-solve around tenant, building, and community issues. DHS will also provide in-kind clinical services on-site and through referral to primary care homes to ensure that each tenant receives high quality medical care.

### **Rental Subsidy Commitment**

VCHC will apply for an allocation of Project Based Section 8 vouchers from the Housing Authority of the City of Los Angeles in December 2019. However, in the event they are unable to secure all of the necessary Project Based Section 8

vouchers for the Reese-Davidson Community project, it is DHS' intention to assist VCHC to receive the Flexible Housing Subsidy Pool (FHSP) rental subsidy for the 68 PSH units.

Should VCHC require FHSP rental subsidies, unit rent will be set according to the Housing Authority of the City of Los Angeles' Fair Market Rents at the time of lease up. Residents will pay thirty percent (30%) of their certified income towards rent, and the FHSP subsidy will cover total rent minus tenant rent contribution.

Upon receiving the various capital funding commitments necessary to ensure project feasibility, DHS will, through our established funding approval and contracting procedures, engage in contract negotiations with appropriate parties to provide the services and funding described above.

The term of current DHS supportive services agreement is through June 30, 2022, inclusive of DHS' authority to exercise extension options and the term of the Brilliant Corners rental subsidy agreement is fifteen years. In all likelihood, barring unforeseen financial difficulties for the County, and assuming the project continues to operate in good standing, contracts for this project would be renewed at the end of the contract term to ensure that formerly homeless tenants of the project continue to receive high quality housing.

Once again, we are extremely enthusiastic about this project and happy to be partnering with Venice Community Housing Corporation.

Sincerely,

A handwritten signature in blue ink, appearing to read "Marc Trotz".


Marc Trotz, Director  
Housing for Health

# **EXHIBIT B**

**CITY OF LOS ANGELES**  
INTER-DEPARTMENTAL CORRESPONDENCE

October 16, 2019

TO: Interested Parties  
Department of City Planning Staff

FROM: Kevin J. Keller, AICP   
Executive Officer  
Department of City Planning

SUBJECT: IMPLEMENTATION OF AB 1197 – CEQA EXEMPTION FOR SUPPORTIVE  
HOUSING AND EMERGENCY SHELTERS

On September 26, 2019, Governor Newsom signed AB 1197 (Santiago), which went into effect upon signature and will remain in effect until January 1, 2025. The bill established a new Section 21080.27 of the California Public Resources Code (PRC) to exempt from the requirements of the California Environmental Quality Act (CEQA) certain activities and actions that are approved or carried out by the City of Los Angeles related to the provision of emergency shelters and supportive housing.

Specifically, the bill creates a CEQA exemption for three types of activities related to emergency shelters and supportive housing, including: (1) any activity approved by or carried out by the City of Los Angeles “in furtherance of providing emergency shelters or supportive housing” in the City; (2) any action taken by an eligible public agency to lease land owned by the agency or provide financial assistance “in furtherance of providing emergency shelters or supportive housing” in the City; and (3) the adoption of the City’s Permanent Supportive Housing Ordinance (No. 185,492) and Interim Motel Conversion Ordinance (No. 185,489) in 2018.

Please refer to California Public Resources Code Section 21080.27 for additional guidance.

**Definitions**

Emergency Shelter

An emergency shelter is defined for the purposes of this bill as, during a declaration of a shelter crisis described in Government Code Section 8698.2, any shelter that meets all of the following requirements:

1. The shelter meets the definition of a Low Barrier Navigation Center set forth in Government Code Section 65660; and
2. The shelter meets the requirements of Government Code Section 65662; and

3. The shelter is located in either a mixed-use or nonresidential zone permitting multifamily uses,<sup>1</sup> or infill site;<sup>2</sup> and
4. The shelter is funded, in whole or in part, by any of the following:
  - a. The Homeless Emergency Aid program (Health and Safety Code Section 50211); or
  - b. The Homeless Housing, Assistance, and Prevention (HEAP) program (Health and Safety Code Section 50217); or
  - c. County of Los Angeles Measure H funds; or
  - d. City of Los Angeles Measure HHH funds.

The City of Los Angeles is currently operating under a declared shelter crisis pursuant to Government Code Section 8698.2 (CF 15-1138-S33).

For the purposes of determining whether an emergency shelter is funded, in whole or in part, by one of the applicable funding sources, an approved letter of commitment from the applicable funding agency or an official record of final City Council action to issue funds will be required prior to determination of the exemption.

### Supportive Housing

Supportive housing is defined for the purposes of this bill as housing with no limit on length of stay, that is occupied by persons, including persons with disabilities, and families who are homeless or who are homeless youth, and that is linked to onsite or offsite services that assist the supportive housing resident in retaining the housing, improving his or her health status, and maximizing his or her ability to live and, when possible, work in the community. Such supportive housing development must additionally meet the following two requirements:

1. The supportive housing development meets the eligibility requirements of any of the following:
  - a. Government Code Section 65650 (AB 2162); or
  - b. An Interim Motel Housing Project pursuant to Los Angeles Municipal Code (LAMC) Section 14.00 A.12; or
  - c. Qualified Permanent Supportive Housing pursuant to LAMC Section 14.00 A.13; and
2. The supportive housing development is funded, in whole or in part, by any of the following:
  - a. The No Place Like Home Program (Part 3.9 (commencing with Section 5849.1) of Division 5 of the Welfare and Institutions Code); or

<sup>1</sup> For the purposes of determining whether a shelter is located in a mixed-use or nonresidential zone permitting multifamily uses, the following zones may be eligible: RAS3, RAS4, CR, C1, C1.5, C2, C4, C5, CM, and HI. Additionally, the PF zone may be eligible if the site is adjoining a zone that allows for mixed uses or a nonresidential zone permitting multifamily uses. Various Specific Plan zone designations may also be eligible; however, additional review may be necessary on a case-by-case basis to determine eligibility of sites with Specific Plan zone designations.

<sup>2</sup> A site may be considered an "infill site" if it meets the definition provided in PRC Sections 21061.3 and 21072, meaning that the site either: (1) was previously developed for a "qualified urban use," which includes most non-industrial uses; or (2) is adjacent to parcels that are developed with a "qualified urban use" (or at least 75 percent of the perimeter adjoins parcels that are so developed, and the remaining 25 percent were previously developed with a "qualified urban use"), and none of the parcels on the site had been created within the past 10 years except through a redevelopment agency plan. This definition is likely generally applicable to most non-industrial sites within the City of Los Angeles. Any industrial-zoned or industrial-zone-adjacent sites should be carefully evaluated to determine whether the site and/or adjacent sites are or were "developed with qualified urban uses," or whether they are instead developed with potentially non-qualifying "industrial" uses.

- b. The Building Homes and Jobs Trust Fund (Health and Safety Code Section 50470); or
- c. County of Los Angeles Measure H funds; or
- d. City of Los Angeles Measure HHH funds; or
- e. The City of Los Angeles Housing Impact Trust Fund.

For the purposes of determining whether a supportive housing development is funded, in whole or in part, by one of the applicable funding sources, an approved letter of funding commitment from the applicable funding agency will be required of the applicant as part of the application for the exemption. Such letter must indicate that the project has been awarded funds from one of the five above-listed funding sources. Prior to issuance of a building permit, the Department of City Planning (DCP) will confirm that the project has received clearance from the Housing and Community Investment Department (HCIDLA), or other funding agency, as applicable, to ensure that the project continues to meet the eligibility criteria (i.e. that the award of funds has not been rescinded).

### **Activities Eligible for New Statutory Exemption (PRC Section 21080.27(b)(1))**

Any activity that is carried out by the City of Los Angeles in order to provide emergency shelters or supportive housing that meet the definitions set forth above would qualify for the CEQA exemption provided in PRC Section 21080.27(b)(1). This exemption would include, but is not limited to, approval of discretionary planning entitlements, haul routes, and/or funding decisions.

The CEQA exemption encompasses the approval of planning entitlements that solely enable the proposed emergency shelter or supportive housing use, including but not limited to any necessary Zone Change, General Plan Amendment, Conditional Use Permit, or other required land use action that results in a project that meets the requirements discussed above. In such cases, the Letter of Determination (LOD) issued by DCP should include a project description which specifies that the use is limited to a qualifying emergency shelter or supportive housing development as defined by the bill. The CEQA findings included in the LOD should specify how the project qualifies for the exemption, and the LOD should also include the condition that the project must receive clearance by HCIDLA, or other applicable funding agency, to confirm the qualifying funding source prior to issuance of a building permit.

### **Procedures**

Applicants for emergency shelter and supportive housing projects that are eligible for the CEQA exemption in PRC Section 21080.27 should file a Notice of Exemption with the Office of Planning and Research (OPR) and the Los Angeles County Clerk pursuant to the procedures set forth in PRC 21108 or PRC Section 21152. The Notice of Exemption should include a written justification supporting how the project qualifies as an “emergency shelter” or “supportive housing” under 21080.27(a).

For emergency shelter and supportive housing projects that are currently pending review of a discretionary planning entitlement, applicants are advised to consult with their assigned Department of City Planning project planner to evaluate the applicability of this CEQA exemption.

### **More Information**

For more information, please contact Cally Hardy in the Department of City Planning at [cally.hardy@lacity.org](mailto:cally.hardy@lacity.org) or (213) 978-1643.



# **ATTACHMENT B**



November 2, 2021

## Reese Davidson Community

Council File Nos. 21-0829, 21-0829-S1  
VTM No. 82288  
CPC-2018-7344-GPAJ-VZCJ-HD-SP-SPP-CDP-MEL-WDI-SPR-PHP



# Project Overview



# The Reese Davidson Community Balances Multiple Policy Objectives

- Responds to unprecedented housing crisis
  - 136 affordable and supportive housing units to address housing affordability and homelessness crisis
  - Will more than double existing supportive housing in Venice
  - On-site mental, physical, and educational supportive services, as well as case managers
  - Develops a site identified in the City's Comprehensive Homeless Strategy via the Affordable Housing Opportunities Sites Initiative
- Exceptional design respects Venice's history and character
- Provides extensive landscaping, open space and green features
  - Engages the community with an activated streetscape and site
- Enhances Coastal access, boat launch access, and increases public parking

# Building Design Integrates into Neighborhood Surroundings



- 68 apartments for people experiencing homeless and 68 apartments for low-income households
- Arts studio and community room for residents and the community
- Neighborhood-serving retail and café
- Revitalized Venice Grand Canal pedestrian area
- Emphasis on landscaped open space along pedestrian routes
- Public parking screened from view



# Design Reflects and Enlarges the History of Venice



# Community Engagement, Community Benefits, and Equity

- 3+ years of community engagement, including over 100 community outreach/engagement activities and more than 10 large scale community outreach/public input events
- Formation of Artists for RDC
- Over 2,000 support letters, including more than 530 from Venice
- Located in a neighborhood where ZERO affordable housing units were produced for more than 20 years, thus lessening racial and economic segregation, increasing access to jobs and transportation, and advancing equity principles
- Achieves City's priorities of the AHOS initiative
- Activates the site with multiple amenities for low-income tenants, visitors and the local community, thereby enhancing Coastal access



# Responses to Appeal

# The Project is Exempt from CEQA

- AB 1197 exempts permanent supportive housing from CEQA review
  - Provides supportive housing and approximately 10% of Project's non-residential square footage is dedicated to onsite supportive services
  - Obtained Measure H funding commitment letter
  - Applicant has provided a comprehensive supportive services plan and will provide a final plan to the planning agency at lease up
  - Supportive services include: comprehensive psychosocial assessments; individualized case management plans; access to food, clothes, and other basic necessities; health, mental health, and substance abuse services, and medication and treatment; and income programs and healthcare benefits

# The Map Is Consistent with the General and Specific Plans

- Appropriately conditioned VTTM approval on amendments to the general and specific plan
- City may process a general plan amendment here because the Project's geographic area has a social, economic, and physical identity
- Project will be consistent with the general uses, height, and bulk of development of the surrounding area and is not spot zoning
- Project complies with the Exclusive Negotiating Agreement



Proposed Roof Deck  
Design



# The Design and Improvements of the Proposed Subdivision are Consistent with the Applicable General and Specific Plans

- Parking
  - 27 additional parking spaces in East Garage
  - Beach parking automation will not impact parking at Project Site
  - Parking lots in Project Area have excess capacity to compensate for lost parking spaces during construction
- Park Space
  - Project improves open space and public access
  - LUP policy does not require the City to establish a park at the site

- Enhanced Public Access for Canal Boating



Existing Site is Primarily Paved Parking Lot with Minimal Vegetation

# The Proposed Amendments are Consistent with Open Space Requirements

- Improved public access to recreation along the Grand Canal, enhanced coastal access, and increased affordable housing
  - Currently an underutilized parking lot with four residential units
  - Project will provide over 16,000 square feet of open space, including nearly 5,000 square feet of landscaped space
  - Project will provide pedestrian pathways, terraced seating, landscaped space and plaza areas for public recreation along the Grand Canal



Existing Site with Limited Public Access and Minimal Landscaping



Proposed Site with Expanded Open Public Space 11





# The Site is Physically Suitable for the Proposed Type of Development

- Property has frontage on 4 streets, land is level, utilities are available, FAR is 1.15:1, the building height echoes surrounding buildings, and proposed residential, commercial, and parking uses conform with adjacent parcels
  - Project's merger of 40 existing lots irrelevant to site's physical suitability for proposed development
  - No evidence that existing infrastructure is insufficient to support the Project





## Subdivision Design and Improvements will not Conflict with Easements at Large for Access

- Canal and adjacent Esplanade will be maintained as a public right of way and access to the Canal will be maintained
- Project to provide direct canal access to Project residents and general public
- Project will observe all utility easements on property



Public Access Along Canal

# The Project Site is Suitable for the Proposed Density | The Project Site is Safe

- Sea Level Rise/Flood Risk: Site not susceptible to flooding from sea level risk for useful life
- Tsunami Inundation Zone: Site analysis demonstrated that Site not within tsunami inundation zone
- Methane Zone: Project will comply with City's Methane Ordinance
- Liquefaction Zone: Any potential for liquefaction addressed by Project's design, including foundation design that minimizes effects of settlement
- Left-turn Only Site Access/Egress: BOE and LADOT found the Project Site and abutting public rights-of-way sufficient to provide adequate public access through and adjacent to the Project Site

# The City's Approval was Based on Current Flood Information

- Project accounts for 8-foot base flood elevation in FEMA's flood insurance rate map
- Project meets Lowest First Finished Floor requirements of Flood Hazard Management Specific Plan
- Project accounted for current FEMA flood maps

# Public Welfare and Mello Act Compliance

- Project consistent with public necessity, convenience, general welfare and good zoning practice and California Coastal Act of 1976
- Mello Compliance Act: 100% of units in project are affordable housing units
  - 136 low-income units
  - 68 units designated for permanent supportive housing for those experiencing homelessness
  - 68 units designated for low-income individuals or households



High quality permanent, affordable homes with services and amenities

# The Project is not Likely to Cause Substantial Environmental Damage

- Findings in compliance with Gov. Code § 66474 (E)
  - Site is currently a developed asphalt parking lot
  - Project Site does not:
    - contain natural open spaces, riparian habitat, wetland habitat, migratory corridors, native species, or protected trees;
    - act as a wildlife corridor;
    - conflict with a Habitat Conservation Plan;
    - possess any areas of significant biological resource value; or
    - encroach or construct structures within the Grand Canal Esplanade or within the canal



Existing Project Site

# The Advisory Agency and City Planning Commission provided a Fair Hearing and Complied with the Brown Act

- The Advisory Agency provided a fair hearing
  - No evidence of significant defects or prejudice
- The City Planning Commission complied with the Brown Act
  - All Commissioners were present during the May 27, 2021 hearing through Zoom
  - The Brown Act states that teleconferencing includes a meeting *“through either audio or video, or both”*
  - No evidence Planning Commissioners had any conflicts of interest

# Conclusion

- We respectfully request that the City Council deny Appellant's appeals
  - Project is exempt from CEQA under AB 1197
  - Project will double the affordable housing stock in the Venice Beach Community
  - Project will provide essential services and training to underserved community
  - Project will increase open public space, expand beachside parking, and beautify the surrounding area
  - Appellants received a fair hearing

