

Justification/Reason for Appeal

TENTEN Hollywood Project

CPC-2020-3253-DB-SPR-HCA (ENV-2020-3254-CE; VTT-82714-HCA-1A; ZA-1997-797-ZV-PA1-1A)

I. REASON FOR THE APPEAL

Supporters Alliance for Environmental Responsibility (“SAFER”) appeals the City Planning Commission’s approval of the Site Plan Review entitlements for the TENTEN Hollywood Project (CPC-2020-3253-DB-SPR-HCA) (“Project”). The Plan Approval, Density Bonus Compliance review approval, and Site Plan Review approval are all rendered invalid because they are based on incorrect findings. Specifically, the Planning Commission’s finding number 5 was incorrect because it claims that the project is categorically exempt from the California Environmental Quality Act (“CEQA”), which it is not. The City of Los Angeles (“City”) prepared a CEQA categorical exemption for the Project pursuant to Section 15332 of the CEQA Guidelines (“Infill Exemption”). However, the Infill Exemption is not applicable due to the Project’s significant indoor and outdoor air quality impacts and noise impacts. Approval of the Site Plan Review was therefore in error. Since the Project is not exempt from CEQA, the City must prepare an initial study and determine the appropriate level of review required under CEQA prior to *any approvals* in furtherance of the Project.

II. SPECIFICALLY THE POINTS AT ISSUE

The specific points at issue are set forth in the attached comment letter dated September 21, 2022. The Planning Commission’s finding number 5 was incorrect. As detailed in the letter, the Project does not qualify for an Infill Exemption because the Project will have significant indoor and outdoor air quality impacts and noise impacts, and it therefore does not meet the terms of the exemption. Because proper CEQA review must be complete *before* the City approves the Project’s entitlements (*Orinda Ass’n. v. Bd. of Supervisors* (1986) 182 Cal.App.3d 1145, 1171 [“No agency may approve a project subject to CEQA until the entire CEQA process is completed and the overall project is lawfully approved”]), the approval of the Project’s Site Plan Review entitlements was in error. Additionally, by failing to properly conduct environmental review under CEQA, the City lacks substantial evidence to support its findings for the Site Plan Review entitlements.

III. HOW YOU ARE AGGRIEVED BY THE DECISION

Members of appellant, SAFER, live and/or work in the vicinity of the proposed Project. They breathe the air, suffer noise impacts, and will suffer other environmental impacts of the Project unless those impacts are properly mitigated.

IV. WHY YOU BELIEVE THE DECISION-MAKER ERRED OR ABUSED THEIR DISCRETION

The City Planning Commission approved the Site Plan Review based on an incorrect finding, specifically, finding number 5. The CPC approved an Infill Exemption despite substantial evidence presented by SAFER of the Project’s significant indoor and outdoor air quality impacts and noise impacts. Rather than exempt the Project from CEQA, the City should have prepared an initial study followed by an EIR or negative declaration in accordance with CEQA prior to consideration of approvals for the Project. The City is not permitted to approve the Project’s entitlements until proper CEQA review has been completed.



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September 21, 2022

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Re: Comment on Categorical Exemption for the TENTEN Hollywood Project (CPC-2020-3253-DB-SPR-HCA; ENV-2020-3254-CE) September 22, 2022 City Planning Commission Agenda Items 8-10

Dear President Millman, Vice President Choe, Honorable Members of the Planning Commission, and Mr. Song:

I am writing on behalf of Supporters Alliance for Environmental Responsibility ("SAFER"), regarding the California Environmental Quality Act ("CEQA") Class 32 (In-fill Development) Categorical Exemption prepared for the proposed TENTEN Hollywood Project (CPC-2020-3253-DB-SPR-HCA; ENV-2020-3254-CE), including all actions related or referring to the construction of two five- to six-story buildings with a total of 169 residential dwelling units and three levels of subterranean parking, located at 1125 North Gower Street in the City of Los Angeles ("Project"), which is scheduled to be heard by the City Planning Commission on September 22, 2022.

SAFER objects to the City's decision to exempt the Project from review under the California Environmental Quality Act ("CEQA") pursuant to Section 15332 of the CEQA Guidelines, also known as the "Class 32" or "infill exemption." SAFER requests that the Planning Commission decline to approve the Project unless and until proper CEQA review is conducted. CEQA review is required to analyze the Project's significant impacts and to propose feasible mitigation measures.

This comment is supported by the comments of industrial hygienist, Francis Offermann, P.E., who concludes that the Project will have significant indoor air quality

impacts. (Exhibit A). Dr. Paul Rosenfeld, Ph.D., and Matthew Hagemann, C.Hg. of expert environmental consulting firm Soil Water Air Protection Enterprise, (SWAPE), who conclude that the Project's emissions would exceed SCAQMD thresholds, and therefore air quality impacts are significant. (Exhibit B). Acoustical Engineer, Deborah Jue, M.S., of the Wilson Ihrig consulting firm, concludes that the Project will have significant noise impacts. (Exhibit C). Due to these impacts, the City of Los Angeles cannot rely on the Class 32 Categorical Exemption because the terms of the exemption do not apply. Since the Project is not exempt from CEQA, an initial study must be prepared to determine the appropriate level of CEQA review required.

I. LEGAL STANDARD

As the California Supreme Court has held, “[i]f no EIR has been prepared for a nonexempt project, but substantial evidence in the record supports a fair argument that the project may result in significant adverse impacts, the proper remedy is to order preparation of an EIR.” (*Communities for a Better Env't v. South Coast Air Quality Mgmt. Dist.* (2010) 48 Cal.4th 310, 319-20 [citing *No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.3d 68, 75, 88]; *Brentwood Assn. for No Drilling, Inc. v. City of Los Angeles* (1982) 134 Cal.App.3d 491, 504–505). “Significant environmental effect” is defined very broadly as “a substantial or potentially substantial adverse change in the environment.” (Pub. Res. Code (“PRC”) § 21068; see also, 14 CCR § 15382). An effect on the environment need not be “momentous” to meet the CEQA test for significance; it is enough that the impacts are “not trivial.” (*No Oil, Inc.*, 13 Cal.3d at 83). “The ‘foremost principle’ in interpreting CEQA is that the Legislature intended the act to be read so as to afford the fullest possible protection to the environment within the reasonable scope of the statutory language.” (*Communities for a Better Env't v. Cal. Res. Agency* (2002) 103 Cal.App.4th 98, 109).

To achieve its objectives of environmental protection, CEQA has a three-tiered structure. (14 CCR § 15002(k); *Committee to Save the Hollywoodland Specific Plan v. City of Los Angeles* (2008) 161 Cal.App.4th 1168, 1185-86). First, if a project falls into an exempt category, or it can be seen with certainty that the activity in question will not have a significant effect on the environment, no further agency evaluation is required. (*Id.*). Second, if there is a possibility the project will have a significant effect on the environment, the agency must perform an initial threshold study. (*Id.*; 14 CCR § 15063(a)). If the study indicates that there is no substantial evidence that the project or any of its aspects may cause a significant effect on the environment the agency may issue a negative declaration. (*Id.*; 14 CCR §§ 15063(b)(2), 15070). Finally, if the project will have a significant effect on the environment, an EIR is required. (*Id.*).

The classes of projects which are exempt from the provisions of CEQA are called categorical exemptions. (14 CCR §§ 15300, 15354). “Exemptions to CEQA are narrowly construed and [e]xemption categories are not to be expanded beyond the reasonable

scope of their statutory language.’ [Citations].” (*Mountain Lion Foundation v. Fish & Game Com.* (1997) 16 Cal.4th 105, 125). The determination as to the appropriate scope of a categorical exemption is a question of law subject to independent, or de novo, review. (*San Lorenzo Valley Community Advocates for Responsible Education v. San Lorenzo Valley Unified School Dist.*, (2006) 139 Cal. App. 4th 1356, 1375 [“[Q]uestions of interpretation or application of the requirements of CEQA are matters of law. [Citations.] Thus, for example, interpreting the scope of a CEQA exemption presents ‘a question of law, subject to de novo review by this court.’ [Citations].”). In addition, there are several exceptions to CEQA’s categorical exemptions. (See, 14 CCR § 15300.2). The City has chosen to proceed under a Categorical Exemption for In-Fill Development, but as demonstrated below, the Project does not qualify for that exemption and the City must prepare an initial study and determine the appropriate level of CEQA review.

II. DISCUSSION

A. The City Incorrectly Applied CEQA’s Class 32 Categorical Exemption to the Project and Thus a Full CEQA Analysis Is Required.

The proposed Project does not qualify for a Class 32 categorical exemption under CEQA because of the Project’s potentially significant air quality and noise impacts, and the Project site may have value to the threatened California Gnatcatcher. The City must prepare an Initial Study and a mitigated negative declaration or an environmental impact report to analyze the Project’s impacts and propose feasible mitigation measures.

1. The Class 32 Exemption Does Not Apply on its Face.

The City is relying on the Class 32 (in-fill development) categorical exemption for this project. The Class 32 exemption provides:

Class 32 consists of projects characterized as in-fill development meeting the conditions described in this section.

- (a) The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.
- (b) The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.
- (c) The project site has ***no value, as habitat for endangered, rare or threatened species.***
- (d) Approval of the project would not result in any significant effects relating to ***traffic, noise, air quality, or water quality.***

(e) The site can be adequately served by all required utilities and public services.

(14 CCR § 15332 [emph. added]).

A key limitation of the Class 32 exemption is that it does not apply if the project will have any significant effects relating to traffic, noise, air quality, or water quality. (14 CCR § 15332(d)). Here, the exemption cannot apply because there is evidence which demonstrates that the Project may have significant impacts on air quality and noise.

2. The Project Will Have a Significant Health Risk Impact from Indoor Air Quality Impacts, Precluding Reliance on the Class 32 Exemption.

Certified Industrial Hygienist, Francis “Bud” Offermann, PE, CIH, has conducted a review of the proposed Project and relevant documents regarding the Project’s indoor air emissions. Indoor Environmental Engineering Comments (Exhibit A). Mr. Offermann concludes that it is likely that the Project will expose residents and commercial employees of the Project to significant impacts related to indoor air quality, and in particular, emissions of the cancer-causing chemical formaldehyde. Mr. Offermann is a leading expert on indoor air quality and has published extensively on the topic. Mr. Offermann’s expert comments and curriculum vitae are attached as Exhibit A.

Mr. Offermann explains that many composite wood products used in building materials and furnishings commonly found in offices, warehouses, residences, and hotels contain formaldehyde-based glues which off-gas formaldehyde over a very long time period. He states, “The primary source of formaldehyde indoors is composite wood products manufactured with urea-formaldehyde resins, such as plywood, medium density fiberboard, and particleboard. These materials are commonly used in building construction for flooring, cabinetry, baseboards, window shades, interior doors, and window and door trims.” (Ex. A, pp. 2-3.)

Formaldehyde is a known human carcinogen. Mr. Offermann states that there is a fair argument that future residents of the commercial spaces will be exposed to a cancer risk from formaldehyde of approximately 120 per million, assuming all materials are compliant with the California Air Resources Board’s formaldehyde airborne toxics control measure. (*Id.*, pp. 3-4.) This exceeds the SCAQMD CEQA significance threshold for airborne cancer risk of 10 per million. (*Id.*, pp. 2-4.)

Mr. Offermann also notes that the high cancer risk that may be posed by the Project’s indoor air emissions likely will be exacerbated by the additional cancer risk that exists as a result of the Project’s location near roadways with moderate to high traffic (i.e. West Manchester Avenue, South Budlong Avenue, Raymond Avenue, West 85th

Street, West 87th Street, etc.) and the high levels of PM 2.5 already present in the ambient air. (*Id.*, pp. 10-11.)

This air quality impact precludes the applicability of the Class 32 Exemption. (14 CCR § 15332(d).) Mr. Offermann points out that there are feasible mitigation measures that could be imposed through a CEQA process, such as requiring the use of no-added-formaldehyde building materials and flooring, or solid wood products. These measures would drastically reduce formaldehyde exposure and have been implemented in many similar projects. CEQA review is required to analyze such mitigation measures.

3. The Project Will Have a Significant Air Quality Impacts from Diesel Particulate Matter, Precluding Reliance on the Class 32 Exemption.

Environmental chemist Dr. Paul Rosenfeld and certified hydrogeologist Matt Hagemann of the environmental consulting firm SWAPE reviewed the Staff Report prepared in support of the Exemption and found potentially significant air quality impacts. SWAPE's comment letter is attached as Exhibit B and incorporated herein by reference.

In order to estimate the Project's construction-related and operational emissions, SWAPE used California Emissions Estimator Model (CalEEMod) Version 2020.4.0, and Project-specific information from the Project's Staff Report. SWAPE determined that the City's consultant manipulated the CalEEMod model by manually adjusting default parameters without justification. This resulted in an improper undercalculation of Project emissions. For example:

- The City's model uses significantly different construction equipment projections than provided in CalEEMod. (SWAPE, p.3).
- The City's model underestimates worker trips by 20-30%. (SWAPE p. 4).
- The City's model overestimates carbon sequestration from the planting of trees. The City assumes that 43 trees will be planted as part of the Project, which will result in carbon sequestration. However, the City fails to take into account that the Project includes the removal of 22 existing trees. Therefore, the net number of new trees is only 21 net new trees, not 43. As a result, the carbon sequestration numbers are vastly overestimated. (SWAPE, p. 5).
- The City's model assumes the use of low-VOC cleaning supplies. However, this measure is not an enforceable mitigation measure, so the CatEx may not

take credit for emission reductions related to the unenforceable measure.¹
(SWAPE, p. 6).

All of these model manipulations and errors result in an underestimation of Project emissions.

Correcting for the above errors and manipulations, SWAPE calculates that the Project will have highly significant emission of Diesel Particulate Matter (DPM). Using the AERSCREEN model recommended by the California Office of Environmental Health Hazard Assessment (OEHHA) and the California Air Pollution Control Officers Association (CAPCOA), SWAPE calculates that DPM emissions generated by the Project will create a **cancer risk of 130 per million, far above the 10 per million CEQA significance threshold.** (SWAPE, p. 12). The City failed to conduct any health risk assessment (HRA), and there is therefore no substantial evidence to rebut SWAPE's conclusion.

4. The Project Will Have a Significant Greenhouse Gas Impacts, Precluding Reliance on the Class 32 Exemption.

SWAPE also concludes that the Project will have significant Greenhouse Gas (GHG) impacts. The City concludes that the Project's GHG emissions will be 1,642 metric tons per year, which is below the South Coast Air Quality Management District (SCAQMD) bright-line threshold of 3,000 MT/year. (CatEx, p. 65).

However, as discussed above, the CatEx underestimates Project emissions and overestimates carbon sequestration. Thus, the City's calculation is erroneous. (SWAPE, p. 14). Also, the CatEx's reliance on the 3,000 MT/yr threshold is improper. That threshold is based on AB32 2020 targets. The Association of Environmental Professionals (AEP) suggests, relying on published case law, that the AB32 threshold is inappropriate for projects with a "post-2020 horizon." SWAPE recommends using the SCAMQD's 2035 efficiency target of 3.0 MT/yr/service population. SWAPE calculates that the Project will exceed this threshold, and will therefore have a significant GHG impact. (SWAPE, p. 15). SWAPE also concludes that the CatEx fails to consider the Project's compliance with GHG plans including the CARB 2017 Scoping Plan, VMT benchmarks of SB 375 per capita GHG emission goals, Southern California Association of Government's (SCAG) Regional Transportation Plan (RTP) and Sustainable Community Strategy (SCS).

¹ Mitigation measures must be fully enforceable through permit conditions, agreements or other legally binding instruments. 14 CCR § 15126.4(a)(2). See *Woodward Park Homeowners Assn., Inc. v. City of Fresno* (2007) 150 Cal. App. 4th 683, 730 (project proponent's agreement to a mitigation by itself is insufficient; mitigation measure must be an enforceable requirement).

Where a local or regional policy of general applicability is adopted in order to avoid or mitigate environmental effects, a conflict with that policy in itself indicates a potentially significant impact on the environment. (*Pocket Protectors v. Sacramento* (2005) 124 Cal.App.4th 903; *Georgetown Preservation Society v. County of El Dorado* (2018) 30 Cal.App.5th 358.) Indeed, any inconsistencies between a proposed project and applicable plans must be discussed in an EIR. (14 CCR § 15125(d); *City of Long Beach v. Los Angeles Unif. School Dist.* (2009) 176 Cal. App. 4th 889, 918; *Friends of the Eel River v. Sonoma County Water Agency* (2003) 108 Cal. App. 4th 859, 874 (EIR inadequate when Lead Agency failed to identify relationship of project to relevant local plans).) A Project's inconsistencies with local plans and policies constitute significant impacts under CEQA. (*Endangered Habitats League, Inc. v. County of Orange* (2005) 131 Cal.App.4th 777, 783-4).

"CEQA places the burden of environmental investigation on government rather than the public. If the local agency has failed to study an area of possible environmental impact, a fair argument may be based on the limited facts in the record." (*Gentry v. City of Murrieta* (1995) 36 Cal.App.4th 1359, 1378–79 [quotations omitted].) Indeed, "[d]eficiencies in the record may actually enlarge the scope of fair argument by lending a logical plausibility to a wider range of inferences." (*Id.*; see also *Christward Ministry v. Superior Court* (1986) 184 Cal.App.3d 180, 197 [holding that city's failure to undertake adequate environmental analysis further supported fair argument that project would have significant impacts].)

The City must therefore analyze the Project's consistency with the aforementioned plans and policies. Failure to conduct such analysis creates a fair argument of a significant impact.

5. The Project Will Have Significant Noise Impacts Precluding the Reliance on the CEQA Infill Exemption.

Acoustical Engineer, Deborah Jue, M.S., of the consulting firm, Wilson Ihrig, concludes that the Project will have significant noise impacts. (Exhibit C). The Class 32 exemption is therefore precluded and a CEQA document is required to analyze the Project's noise impacts and to propose feasible mitigation measures.

Ms. Jue notes that the Project is surrounded by noise sensitive uses, including residences to the north on Lexington Avenue, to the west facing Lodi Place, and to the east on North Gower Street. (Ex. C, p.1). Jue notes that the CatEx contains no baseline data for nighttime noise. (Ex. C, p.2). Without the baseline data, an adequate analysis cannot be conducted.

Every CEQA document must start from a “baseline” assumption. The CEQA “baseline” is the set of environmental conditions against which to compare a project’s anticipated impacts. (*Communities for a Better Environment v. So. Coast Air Qual. Mgmt. Dist.* (2010) 48 Cal. 4th 310, 321). Section 15125(a) of the CEQA Guidelines (14 C.C.R., § 15125(a)) states in pertinent part that a lead agency’s environmental review under CEQA:

“...must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time [environmental analysis] is commenced, from both a local and regional perspective. This environmental setting will normally constitute the baseline physical conditions by which a Lead Agency determines whether an impact is significant.”

(See, *Save Our Peninsula Committee v. County of Monterey* (2001) 87 Cal.App.4th 99, 124-125 (“*Save Our Peninsula.*”) As the court of appeal has explained, “the impacts of the project must be measured against the ‘real conditions on the ground,’” and not against hypothetical permitted levels. (*Save Our Peninsula*, 87 Cal.App.4th 99, 121-123.) As the court has explained, using such a skewed baseline “mislead(s) the public” and “draws a red herring across the path of public input.” (*San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645, 656; *Woodward Park Homeowners v. City of Fresno* (2007) 150 Cal.App.4th 683, 708-711.)

Jue concludes that 50 voices on the rooftop deck/terraces proposed in the Project would generate 72 dBA of noise at a distance of 90 feet. This would be much higher than 5 dBA above daytime noise levels, and likely much higher than 5 dBA above nighttime ambient levels. (Ex. C., p.3).

Jue points out that the CatEx assumes that the HVAC equipment would be similar to that in use at the existing building on the Project site. This is erroneous. The existing building is a 2-story commercial building. The proposed Project is a 6-story residential project. Residential buildings require nighttime ventilation, while commercial buildings often turn off the ventilation during nighttime hours. Jue concludes that the nighttime HVAC could create noise much greater than 5 dBA above ambient nighttime levels, which would be significant. (Ex. C., p. 3). The nighttime HVAC would create noise at a level of 51 dBA at a distance of 100 feet

Jue states that there are numerous feasible mitigation measures that could reduce these impacts. These measures should be analyzed in a CEQA document. (Ex. C., p.3).

6. The Site May Have Value to as Habitat for Endangered, Rare or Threatened Species, Precluding Reliance on the Class 32 Exemption.

CEQA's Infill Exemption can only apply if, based on substantial evidence, "[t]he project site has **no value, as habitat for endangered, rare or threatened species.**" (14 CCR § 15332(c) (emphasis added).) The City's Categorical Exemption states, that the California Gnatcatcher "occurs within the broader project locale," but the project site "is located outside of the designated critical habitat." (Cat.Ex., p. 43). The California gnatcatcher, is identified under the U.S. Endangered Species Act as a "threatened" species and as a Bird Species of Special Concern by the State of California.

The subsection "c" exception to the Class 32 exemption is not limited to areas designated as "critical habitat." The exception is far broader, encompassing any area that "has value" to "endangered, rare or threatened species." Since the California Gnatcatcher "occurs within the broader project locale," the Project site "has value" to the Gnatcatcher. Therefore, the Class 32 exemption does not apply.

CEQA review is required to analyze the Project's potential impacts on the California Gnatcatcher, and to propose feasible mitigation measures. Possible mitigation may include pre-construction site surveys to identify any Gnatcatchers, relocation of any individuals, avoidance during nesting season, or provision or offset habitat. Such measures should be analyzed in a CEQA document.

B. The Unusual Circumstances Exception Precludes Reliance on the Class 32 Exemption.

A categorical exemption is inapplicable "where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances." (14 CCR 15300.2(c)). Here, the Project does not present the same general risk of environmental impacts as other projects falling under Class 32 exemptions and therefore the exemption cannot apply.

In *Berkeley Hillside Preservation v. City of Berkeley*, the California Supreme Court explained that there are two ways a party may invoke the unusual circumstances exception. First, "a party may establish an unusual circumstance with evidence that the project *will* have a significant environmental effect. That evidence, if convincing, necessarily also establishes 'a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.'" (*Berkeley Hillside Preservation v. City of Berkeley* (2015) 60 Cal.4th 1086, 1105 [emph. added]). Alternatively, "[a] party invoking the exception may establish an unusual circumstance without evidence of an environmental effect, by showing that the project has some feature that distinguishes it from others in the exempt class, such as its size or location. In such a case, to render the exception applicable, the party need only show a reasonable possibility of a significant effect due to that unusual circumstance." (*Id.*).

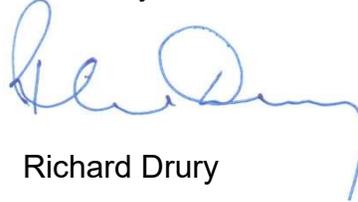
As discussed above, we have submitted substantial evidence that the Project will have significant air quality impacts and noise impacts. The fact that these significant impacts will occur constitutes an unusual circumstance, precluding the City's reliance on an exemption.

In addition, the fact that the Project site has value to the threatened California Gnatcatcher is an unusual circumstance, precluding reliance on the CEQA exemption.

III. CONCLUSION

The City cannot rely on a Class 32 exemption because the Project does not meet the terms of the exemption. Accordingly, the City must prepare an initial study followed by a mitigated negative declaration or EIR. The CEQ document must analyze the Project's environmental impacts and propose feasible mitigation measures. Thank you for considering these comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "Richard Drury", with a long, sweeping tail extending to the right.

Richard Drury

EXHIBIT A



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From: Francis J. Offermann PE CIH

Subject: Indoor Air Quality: TENTEN Hollywood Project, Los Angeles, CA
(IEE File Reference: P-4631)

Pages: 18

Indoor Air Quality Impacts

Indoor air quality (IAQ) directly impacts the comfort and health of building occupants, and the achievement of acceptable IAQ in newly constructed and renovated buildings is a well-recognized design objective. For example, IAQ is addressed by major high-performance building rating systems and building codes (California Building Standards Commission, 2014; USGBC, 2014). Indoor air quality in homes is particularly important because occupants, on average, spend approximately ninety percent of their time indoors with the majority of this time spent at home (EPA, 2011). Some segments of the population that are most susceptible to the effects of poor IAQ, such as the very young and the elderly, occupy their homes almost continuously. Additionally, an increasing number of adults are working from home at least some of the time during the workweek. Indoor air quality also is a serious concern for workers in hotels, offices and other business establishments.

The concentrations of many air pollutants often are elevated in homes and other buildings relative to outdoor air because many of the materials and products used indoors contain and release a variety of pollutants to air (Hodgson et al., 2002; Offermann and Hodgson, 2011). With respect to indoor air contaminants for which inhalation is the primary route of

exposure, the critical design and construction parameters are the provision of adequate ventilation and the reduction of indoor sources of the contaminants.

Indoor Formaldehyde Concentrations Impact. In the California New Home Study (CNHS) of 108 new homes in California (Offermann, 2009), 25 air contaminants were measured, and formaldehyde was identified as the indoor air contaminant with the highest cancer risk as determined by the California Proposition 65 Safe Harbor Levels (OEHHA, 2017a), No Significant Risk Levels (NSRL) for carcinogens. The NSRL is the daily intake level calculated to result in one excess case of cancer in an exposed population of 100,000 (i.e., ten in one million cancer risk) and for formaldehyde is 40 µg/day. The NSRL concentration of formaldehyde that represents a daily dose of 40 µg is 2 µg/m³, assuming a continuous 24-hour exposure, a total daily inhaled air volume of 20 m³, and 100% absorption by the respiratory system. All of the CNHS homes exceeded this NSRL concentration of 2 µg/m³. The median indoor formaldehyde concentration was 36 µg/m³, and ranged from 4.8 to 136 µg/m³, which corresponds to a median exceedance of the 2 µg/m³ NSRL concentration of 18 and a range of 2.3 to 68.

Therefore, the cancer risk of a resident living in a California home with the median indoor formaldehyde concentration of 36 µg/m³, is 180 per million as a result of formaldehyde alone. The CEQA significance threshold for airborne cancer risk is 10 per million, as established by the South Coast Air Quality Management District (SCAQMD, 2015).

Besides being a human carcinogen, formaldehyde is also a potent eye and respiratory irritant. In the CNHS, many homes exceeded the non-cancer reference exposure levels (RELs) prescribed by California Office of Environmental Health Hazard Assessment (OEHHA, 2017b). The percentage of homes exceeding the RELs ranged from 98% for the Chronic REL of 9 µg/m³ to 28% for the Acute REL of 55 µg/m³.

The primary source of formaldehyde indoors is composite wood products manufactured with urea-formaldehyde resins, such as plywood, medium density fiberboard, and particleboard. These materials are commonly used in building construction for flooring, cabinetry, baseboards, window shades, interior doors, and window and door trims.

In January 2009, the California Air Resources Board (CARB) adopted an airborne toxics control measure (ATCM) to reduce formaldehyde emissions from composite wood products, including hardwood plywood, particleboard, medium density fiberboard, and also furniture and other finished products made with these wood products (California Air Resources Board 2009). While this formaldehyde ATCM has resulted in reduced emissions from composite wood products sold in California, they do not preclude that homes built with composite wood products meeting the CARB ATCM will have indoor formaldehyde concentrations below cancer and non-cancer exposure guidelines.

A follow up study to the California New Home Study (CNHS) was conducted in 2016-2018 (Singer et. al., 2019), and found that the median indoor formaldehyde in new homes built after 2009 with CARB Phase 2 Formaldehyde ATCM materials had lower indoor formaldehyde concentrations, with a median indoor concentrations of $22.4 \mu\text{g}/\text{m}^3$ (18.2 ppb) as compared to a median of $36 \mu\text{g}/\text{m}^3$ found in the 2007 CNHS. Unlike in the CNHS study where formaldehyde concentrations were measured with pumped DNPH samplers, the formaldehyde concentrations in the HENGH study were measured with passive samplers, which were estimated to under-measure the true indoor formaldehyde concentrations by approximately 7.5%. Applying this correction to the HENGH indoor formaldehyde concentrations results in a median indoor concentration of $24.1 \mu\text{g}/\text{m}^3$, which is 33% lower than the $36 \mu\text{g}/\text{m}^3$ found in the 2007 CNHS.

Thus, while new homes built after the 2009 CARB formaldehyde ATCM have a 33% lower median indoor formaldehyde concentration and cancer risk, the median lifetime cancer risk is still 120 per million for homes built with CARB compliant composite wood products. This median lifetime cancer risk is more than 12 times the OEHHA 10 in a million cancer risk threshold (OEHHA, 2017a).

With respect to the TENTEN Hollywood Project, Los Angeles, CA, the buildings consist of residential spaces.

The residential occupants will potentially have continuous exposure (e.g. 24 hours per day, 52 weeks per year). These exposures are anticipated to result in significant cancer risks

resulting from exposures to formaldehyde released by the building materials and furnishing commonly found in residential construction.

Because these residences will be constructed with CARB Phase 2 Formaldehyde ATCM materials, and be ventilated with the minimum code required amount of outdoor air, the indoor residential formaldehyde concentrations are likely similar to those concentrations observed in residences built with CARB Phase 2 Formaldehyde ATCM materials, which is a median of 24.1 $\mu\text{g}/\text{m}^3$ (Singer et. al., 2020).

Assuming that the residential occupants inhale 20 m^3 of air per day, the average 70-year lifetime formaldehyde daily dose is 482 $\mu\text{g}/\text{day}$ for continuous exposure in the residences. This exposure represents a cancer risk of 120 per million, which is more than 12 times the CEQA cancer risk of 10 per million. For occupants that do not have continuous exposure, the cancer risk will be proportionally less but still substantially over the CEQA cancer risk of 10 per million (e.g. for 12/hour/day occupancy, more than 6 times the CEQA cancer risk of 10 per million).

Appendix A, Indoor Formaldehyde Concentrations and the CARB Formaldehyde ATCM, provides analyses that show utilization of CARB Phase 2 Formaldehyde ATCM materials will not ensure acceptable cancer risks with respect to formaldehyde emissions from composite wood products.

Even composite wood products manufactured with CARB certified ultra low emitting formaldehyde (ULEF) resins do not insure that the indoor air will have concentrations of formaldehyde that meet the OEHHA cancer risks that substantially exceed 10 per million. The permissible emission rates for ULEF composite wood products are only 11-15% lower than the CARB Phase 2 emission rates. Only use of composite wood products made with no-added formaldehyde resins (NAF), such as resins made from soy, polyvinyl acetate, or methylene diisocyanate can insure that the OEHHA cancer risk of 10 per million is met.

The following describes a method that should be used, prior to construction in the environmental review under CEQA, for determining whether the indoor concentrations

resulting from the formaldehyde emissions of specific building materials/furnishings selected exceed cancer and non-cancer guidelines. Such a design analyses can be used to identify those materials/furnishings prior to the completion of the City's CEQA review and project approval, that have formaldehyde emission rates that contribute to indoor concentrations that exceed cancer and non-cancer guidelines, so that alternative lower emitting materials/furnishings may be selected and/or higher minimum outdoor air ventilation rates can be increased to achieve acceptable indoor concentrations and incorporated as mitigation measures for this project.

Pre-Construction Building Material/Furnishing Formaldehyde Emissions Assessment

This formaldehyde emissions assessment should be used in the environmental review under CEQA to assess the indoor formaldehyde concentrations from the proposed loading of building materials/furnishings, the area-specific formaldehyde emission rate data for building materials/furnishings, and the design minimum outdoor air ventilation rates. This assessment allows the applicant (and the City) to determine, before the conclusion of the environmental review process and the building materials/furnishings are specified, purchased, and installed, if the total chemical emissions will exceed cancer and non-cancer guidelines, and if so, allow for changes in the selection of specific material/furnishings and/or the design minimum outdoor air ventilations rates such that cancer and non-cancer guidelines are not exceeded.

1.) Define Indoor Air Quality Zones. Divide the building into separate indoor air quality zones, (IAQ Zones). IAQ Zones are defined as areas of well-mixed air. Thus, each ventilation system with recirculating air is considered a single zone, and each room or group of rooms where air is not recirculated (e.g. 100% outdoor air) is considered a separate zone. For IAQ Zones with the same construction material/furnishings and design minimum outdoor air ventilation rates. (e.g. hotel rooms, apartments, condominiums, etc.) the formaldehyde emission rates need only be assessed for a single IAQ Zone of that type.

2.) Calculate Material/Furnishing Loading. For each IAQ Zone, determine the building material and furnishing loadings (e.g., m² of material/m² floor area, units of furnishings/m² floor area) from an inventory of all potential indoor formaldehyde sources, including

flooring, ceiling tiles, furnishings, finishes, insulation, sealants, adhesives, and any products constructed with composite wood products containing urea-formaldehyde resins (e.g., plywood, medium density fiberboard, particleboard).

3.) Calculate the Formaldehyde Emission Rate. For each building material, calculate the formaldehyde emission rate ($\mu\text{g}/\text{h}$) from the product of the area-specific formaldehyde emission rate ($\mu\text{g}/\text{m}^2\text{-h}$) and the area (m^2) of material in the IAQ Zone, and from each furnishing (e.g. chairs, desks, etc.) from the unit-specific formaldehyde emission rate ($\mu\text{g}/\text{unit-h}$) and the number of units in the IAQ Zone.

NOTE: As a result of the high-performance building rating systems and building codes (California Building Standards Commission, 2014; USGBC, 2014), most manufacturers of building materials furnishings sold in the United States conduct chemical emission rate tests using the California Department of Health “Standard Method for the Testing and Evaluation of Volatile Organic Chemical Emissions for Indoor Sources Using Environmental Chambers,” (CDPH, 2017), or other equivalent chemical emission rate testing methods. Most manufacturers of building furnishings sold in the United States conduct chemical emission rate tests using ANSI/BIFMA M7.1 Standard Test Method for Determining VOC Emissions (BIFMA, 2018), or other equivalent chemical emission rate testing methods.

CDPH, BIFMA, and other chemical emission rate testing programs, typically certify that a material or furnishing does not create indoor chemical concentrations in excess of the maximum concentrations permitted by their certification. For instance, the CDPH emission rate testing requires that the measured emission rates when input into an office, school, or residential model do not exceed one-half of the OEHHA Chronic Exposure Guidelines (OEHHA, 2017b) for the 35 specific VOCs, including formaldehyde, listed in Table 4-1 of the CDPH test method (CDPH, 2017). These certifications themselves do not provide the actual area-specific formaldehyde emission rate (i.e., $\mu\text{g}/\text{m}^2\text{-h}$) of the product, but rather provide data that the formaldehyde emission rates do not exceed the maximum rate allowed for the certification. Thus, for example, the data for a certification of a specific type of flooring may be used to calculate that the area-specific emission rate of formaldehyde is less than $31 \mu\text{g}/\text{m}^2\text{-h}$, but not the actual measured specific emission rate, which may be 3,

18, or 30 $\mu\text{g}/\text{m}^2\text{-h}$. These area-specific emission rates determined from the product certifications of CDPH, BIFA, and other certification programs can be used as an initial estimate of the formaldehyde emission rate.

If the actual area-specific emission rates of a building material or furnishing is needed (i.e. the initial emission rates estimates from the product certifications are higher than desired), then that data can be acquired by requesting from the manufacturer the complete chemical emission rate test report. For instance if the complete CDPH emission test report is requested for a CDHP certified product, that report will provide the actual area-specific emission rates for not only the 35 specific VOCs, including formaldehyde, listed in Table 4-1 of the CDPH test method (CDPH, 2017), but also all of the cancer and reproductive/developmental chemicals listed in the California Proposition 65 Safe Harbor Levels (OEHHA, 2017a), all of the toxic air contaminants (TACs) in the California Air Resources Board Toxic Air Contamination List (CARB, 2011), and the 10 chemicals with the greatest emission rates.

Alternatively, a sample of the building material or furnishing can be submitted to a chemical emission rate testing laboratory, such as Berkeley Analytical Laboratory (<https://berkeleyanalytical.com>), to measure the formaldehyde emission rate.

4.) Calculate the Total Formaldehyde Emission Rate. For each IAQ Zone, calculate the total formaldehyde emission rate (i.e. $\mu\text{g}/\text{h}$) from the individual formaldehyde emission rates from each of the building material/furnishings as determined in Step 3.

5.) Calculate the Indoor Formaldehyde Concentration. For each IAQ Zone, calculate the indoor formaldehyde concentration ($\mu\text{g}/\text{m}^3$) from Equation 1 by dividing the total formaldehyde emission rates (i.e. $\mu\text{g}/\text{h}$) as determined in Step 4, by the design minimum outdoor air ventilation rate (m^3/h) for the IAQ Zone.

$$C_{in} = \frac{E_{tot}}{Q_{oa}} \quad (\text{Equation 1})$$

where:

C_{in} = indoor formaldehyde concentration ($\mu\text{g}/\text{m}^3$)

E_{total} = total formaldehyde emission rate ($\mu\text{g}/\text{h}$) into the IAQ Zone.

Q_{oa} = design minimum outdoor air ventilation rate to the IAQ Zone (m^3/h)

The above Equation 1 is based upon mass balance theory, and is referenced in Section 3.10.2 “Calculation of Estimated Building Concentrations” of the California Department of Health “Standard Method for the Testing and Evaluation of Volatile Organic Chemical Emissions for Indoor Sources Using Environmental Chambers”, (CDPH, 2017).

6.) Calculate the Indoor Exposure Cancer and Non-Cancer Health Risks. For each IAQ Zone, calculate the cancer and non-cancer health risks from the indoor formaldehyde concentrations determined in Step 5 and as described in the OEHHA Air Toxics Hot Spots Program Risk Assessment Guidelines; Guidance Manual for Preparation of Health Risk Assessments (OEHHA, 2015).

7.) Mitigate Indoor Formaldehyde Exposures of exceeding the CEQA Cancer and/or Non-Cancer Health Risks. In each IAQ Zone, provide mitigation for any formaldehyde exposure risk as determined in Step 6, that exceeds the CEQA cancer risk of 10 per million or the CEQA non-cancer Hazard Quotient of 1.0.

Provide the source and/or ventilation mitigation required in all IAQ Zones to reduce the health risks of the chemical exposures below the CEQA cancer and non-cancer health risks.

Source mitigation for formaldehyde may include:

- 1.) reducing the amount materials and/or furnishings that emit formaldehyde
- 2.) substituting a different material with a lower area-specific emission rate of formaldehyde

Ventilation mitigation for formaldehyde emitted from building materials and/or furnishings may include:

- 1.) increasing the design minimum outdoor air ventilation rate to the IAQ Zone.

NOTE: Mitigating the formaldehyde emissions through use of less material/furnishings, or use of lower emitting materials/furnishings, is the preferred mitigation option, as mitigation

with increased outdoor air ventilation increases initial and operating costs associated with the heating/cooling systems.

Further, we are not asking that the builder “speculate” on what and how much composite materials be used, but rather at the design stage to select composite wood materials based on the formaldehyde emission rates that manufacturers routinely conduct using the California Department of Health “Standard Method for the Testing and Evaluation of Volatile Organic Chemical Emissions for Indoor Sources Using Environmental Chambers,” (CDPH, 2017), and use the procedure described earlier above (i.e. Pre-Construction Building Material/Furnishing Formaldehyde Emissions Assessment) to insure that the materials selected achieve acceptable cancer risks from material off gassing of formaldehyde.

Outdoor Air Ventilation Impact. Another important finding of the CNHS, was that the outdoor air ventilation rates in the homes were very low. Outdoor air ventilation is a very important factor influencing the indoor concentrations of air contaminants, as it is the primary removal mechanism of all indoor air generated contaminants. Lower outdoor air exchange rates cause indoor generated air contaminants to accumulate to higher indoor air concentrations. Many homeowners rarely open their windows or doors for ventilation as a result of their concerns for security/safety, noise, dust, and odor concerns (Price, 2007). In the CNHS field study, 32% of the homes did not use their windows during the 24-hour Test Day, and 15% of the homes did not use their windows during the entire preceding week. Most of the homes with no window usage were homes in the winter field session. Thus, a substantial percentage of homeowners never open their windows, especially in the winter season. The median 24-hour measurement was 0.26 air changes per hour (ach), with a range of 0.09 ach to 5.3 ach. A total of 67% of the homes had outdoor air exchange rates below the minimum California Building Code (2001) requirement of 0.35 ach. Thus, the relatively tight envelope construction, combined with the fact that many people never open their windows for ventilation, results in homes with low outdoor air exchange rates and higher indoor air contaminant concentrations.

According to the Justification to Support a Categorical Exemption – TENTEN Hollywood Project (Parker Environmental Consultants, 2022) the Project is close to roads with moderate to high traffic (e.g., Santa Monica Boulevard – Route 66, North Gower Street, Lexington Avenue, West Beachwood Lane, North El Centro Avenue etc.). As a result the Project site is a sound impacted site.

The Justification to Support a Categorical Exemption – TENTEN Hollywood Project (Parker Environmental Consultants, 2022) contains only short-term monitoring periods of just 15 minutes and do not report the CNEL or Ldn dBA sound levels. In order to design the building such that the interior noise levels are acceptable, long-term one-week measurements need to be conducted to assess the ambient CNEL or Ldn dBA sound levels for the purpose of selecting the appropriate STC for the windows.

As a result of the high outdoor noise levels, the current project will require a mechanical supply of outdoor air ventilation to allow for a habitable interior environment with closed windows and doors. Such a ventilation system would allow windows and doors to be kept closed at the occupant's discretion to control exterior noise within building interiors.

PM_{2.5} Outdoor Concentrations Impact. An additional impact of the nearby motor vehicle traffic associated with this project, are the outdoor concentrations of PM_{2.5}. According to the Justification to Support a Categorical Exemption – TENTEN Hollywood Project (Parker Environmental Consultants, 2022), the Project is located in the South Coast Air Basin, which is a State and Federal non-attainment area for PM_{2.5}.

An air quality analyses should to be conducted to determine the concentrations of PM_{2.5} in the outdoor and indoor air that people inhale each day. This air quality analyses needs to consider the cumulative impacts of the project related emissions, existing and projected future emissions from local PM_{2.5} sources (e.g. stationary sources, motor vehicles, and airport traffic) upon the outdoor air concentrations at the Project site. If the outdoor concentrations are determined to exceed the California and National annual average PM_{2.5} exceedence concentration of 12 µg/m³, or the National 24-hour average exceedence concentration of 35 µg/m³, then the buildings need to have a mechanical supply of outdoor

air that has air filtration with sufficient removal efficiency, such that the indoor concentrations of outdoor PM_{2.5} particles is less than the California and National PM_{2.5} annual and 24-hour standards.

It is my experience that based on the projected high traffic noise levels, the annual average concentration of PM_{2.5} will exceed the California and National PM_{2.5} annual and 24-hour standards and warrant installation of high efficiency air filters (i.e. MERV 13 or higher) in all mechanically supplied outdoor air ventilation systems.

Indoor Air Quality Impact Mitigation Measures

The following are recommended mitigation measures to minimize the impacts upon indoor quality:

Indoor Formaldehyde Concentrations Mitigation. Use only composite wood materials (e.g. hardwood plywood, medium density fiberboard, particleboard) for all interior finish systems that are made with CARB approved no-added formaldehyde (NAF) resins (CARB, 2009). CARB Phase 2 certified composite wood products, or ultra-low emitting formaldehyde (ULEF) resins, do not insure indoor formaldehyde concentrations that are below the CEQA cancer risk of 10 per million. Only composite wood products manufactured with CARB approved no-added formaldehyde (NAF) resins, such as resins made from soy, polyvinyl acetate, or methylene diisocyanate can insure that the OEHHA cancer risk of 10 per million is met.

Alternatively, conduct the previously described Pre-Construction Building Material/Furnishing Chemical Emissions Assessment, to determine that the combination of formaldehyde emissions from building materials and furnishings do not create indoor formaldehyde concentrations that exceed the CEQA cancer and non-cancer health risks.

It is important to note that we are not asking that the builder “speculate” on what and how much composite materials be used, but rather at the design stage to select composite wood materials based on the formaldehyde emission rates that manufacturers routinely conduct

using the California Department of Health “Standard Method for the Testing and Evaluation of Volatile Organic Chemical Emissions for Indoor Sources Using Environmental Chambers”, (CDPH, 2017), and use the procedure described above (i.e. Pre-Construction Building Material/Furnishing Formaldehyde Emissions Assessment) to insure that the materials selected achieve acceptable cancer risks from material off gassing of formaldehyde.

Outdoor Air Ventilation Mitigation. Provide each habitable room with a continuous mechanical supply of outdoor air that meets or exceeds the California 2016 Building Energy Efficiency Standards (California Energy Commission, 2015) requirements of the greater of 15 cfm/occupant or 0.15 cfm/ft² of floor area. Following installation of the system conduct testing and balancing to insure that required amount of outdoor air is entering each habitable room and provide a written report documenting the outdoor airflow rates. Do not use exhaust only mechanical outdoor air systems, use only balanced outdoor air supply and exhaust systems or outdoor air supply only systems. Provide a manual for the occupants or maintenance personnel, that describes the purpose of the mechanical outdoor air system and the operation and maintenance requirements of the system.

PM_{2.5} Outdoor Air Concentration Mitigation. Install air filtration with sufficient PM_{2.5} removal efficiency (e.g. MERV 13 or higher) to filter the outdoor air entering the mechanical outdoor air supply systems, such that the indoor concentrations of outdoor PM_{2.5} particles are less than the California and National PM_{2.5} annual and 24-hour standards. Install the air filters in the system such that they are accessible for replacement by the occupants or maintenance personnel. Include in the mechanical outdoor air ventilation system manual instructions on how to replace the air filters and the estimated frequency of replacement.

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APPENDIX A

INDOOR FORMALDEHYDE CONCENTRATIONS AND THE CARB FORMALDEHYDE ATCM

With respect to formaldehyde emissions from composite wood products, the CARB ATCM regulations of formaldehyde emissions from composite wood products, do not assure healthful indoor air quality. The following is the stated purpose of the CARB ATCM regulation - *The purpose of this airborne toxic control measure is to “reduce formaldehyde emissions from composite wood products, and finished goods that contain composite wood products, that are sold, offered for sale, supplied, used, or manufactured for sale in California”*. In other words, the CARB ATCM regulations do not “assure healthful indoor air quality”, but rather “reduce formaldehyde emissions from composite wood products”.

Just how much protection do the CARB ATCM regulations provide building occupants from the formaldehyde emissions generated by composite wood products? Definitely some, but certainly the regulations do not “*assure healthful indoor air quality*” when CARB Phase 2 products are utilized. As shown in the Chan 2019 study of new California homes, the median indoor formaldehyde concentration was of 22.4 $\mu\text{g}/\text{m}^3$ (18.2 ppb), which corresponds to a cancer risk of 112 per million for occupants with continuous exposure, which is more than 11 times the CEQA cancer risk of 10 per million.

Another way of looking at how much protection the CARB ATCM regulations provide building occupants from the formaldehyde emissions generated by composite wood products is to calculate the maximum number of square feet of composite wood product that can be in a residence without exceeding the CEQA cancer risk of 10 per million for occupants with continuous occupancy.

For this calculation I utilized the floor area (2,272 ft^2), the ceiling height (8.5 ft), and the number of bedrooms (4) as defined in Appendix B (New Single-Family Residence Scenario) of the Standard Method for the Testing and Evaluation of Volatile Organic Chemical Emissions for Indoor Sources Using Environmental Chambers, Version 1.1, 2017, California Department of Public Health,

For the outdoor air ventilation rate I used the 2019 Title 24 code required mechanical ventilation rate (ASHRAE 62.2) of 106 cfm (180 m³/h) calculated for this model residence. For the composite wood formaldehyde emission rates I used the CARB ATCM Phase 2 rates.

The calculated maximum number of square feet of composite wood product that can be in a residence, without exceeding the CEQA cancer risk of 10 per million for occupants with continuous occupancy are as follows for the different types of regulated composite wood products.

Medium Density Fiberboard (MDF) – 15 ft² (0.7% of the floor area), or
Particle Board – 30 ft² (1.3% of the floor area), or
Hardwood Plywood – 54 ft² (2.4% of the floor area), or
Thin MDF – 46 ft² (2.0 % of the floor area).

For offices and hotels the calculated maximum amount of composite wood product (% of floor area) that can be used without exceeding the CEQA cancer risk of 10 per million for occupants, assuming 8 hours/day occupancy, and the California Mechanical Code minimum outdoor air ventilation rates are as follows for the different types of regulated composite wood products.

Medium Density Fiberboard (MDF) – 3.6 % (offices) and 4.6% (hotel rooms), or
Particle Board – 7.2 % (offices) and 9.4% (hotel rooms), or
Hardwood Plywood – 13 % (offices) and 17% (hotel rooms), or
Thin MDF – 11 % (offices) and 14 % (hotel rooms)

Clearly the CARB ATCM does not regulate the formaldehyde emissions from composite wood products such that the potentially large areas of these products, such as for flooring, baseboards, interior doors, window and door trims, and kitchen and bathroom cabinetry, could be used without causing indoor formaldehyde concentrations that result in CEQA

cancer risks that substantially exceed 10 per million for occupants with continuous occupancy.

Even composite wood products manufactured with CARB certified ultra low emitting formaldehyde (ULEF) resins do not insure that the indoor air will have concentrations of formaldehyde that meet the OEHHA cancer risks that substantially exceed 10 per million. The permissible emission rates for ULEF composite wood products are only 11-15% lower than the CARB Phase 2 emission rates. Only use of composite wood products made with no-added formaldehyde resins (NAF), such as resins made from soy, polyvinyl acetate, or methylene diisocyanate can insure that the OEHHA cancer risk of 10 per million is met.

If CARB Phase 2 compliant or ULEF composite wood products are utilized in construction, then the resulting indoor formaldehyde concentrations should be determined in the design phase using the specific amounts of each type of composite wood product, the specific formaldehyde emission rates, and the volume and outdoor air ventilation rates of the indoor spaces, and all feasible mitigation measures employed to reduce this impact (e.g. use less formaldehyde containing composite wood products and/or incorporate mechanical systems capable of higher outdoor air ventilation rates). See the procedure described earlier (i.e. Pre-Construction Building Material/Furnishing Formaldehyde Emissions Assessment) to insure that the materials selected achieve acceptable cancer risks from material off gassing of formaldehyde.

Alternatively, and perhaps a simpler approach, is to use only composite wood products (e.g. hardwood plywood, medium density fiberboard, particleboard) for all interior finish systems that are made with CARB approved no-added formaldehyde (NAF) resins.

EXHIBIT B



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September 20, 2022

Richard Drury
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Subject: Comments on the TENTEN Hollywood Project

Dear Mr. Drury,

We have reviewed the August 2021 Categorical Exemption (“Exemption”) for the TENTEN Hollywood Project (“Project”) located in the City of Los Angeles (“City”). The Project proposes to retain 64,384-SF of an existing commercial building and construct 185,357-square-feet (“SF”) of residential space with 169 dwelling units and 278 parking spaces on the 2.09-acre site.

Our review concludes that the Exemption fails to adequately evaluate the Project’s air quality, health risk, and greenhouse gas impacts. As a result of our findings, the proposed Project does not qualify for a Class 32 Categorical Exemption under the California Environmental Quality Act (“CEQA”) and 14 Cal. Code of Regs. 1500 et seq. (“CEQA Guidelines”) and, therefore, a full CEQA analysis must be prepared to adequately assess and mitigate the potential air quality, health risk, and greenhouse gas impacts that the Project may have on the environment.

Air Quality

Incorrect Reliance on Class 32 Categorical Exemption

The Exemption claims that the Project is categorically exempt pursuant to CEQA Guidelines § 15332, stating:

“For the reasons discussed in this document, the Project is categorically exempt from the requirement for the preparation of environmental documents under Class 32 in Section 15332, Article 19, Chapter 3, Title 14 of the California Code of Regulations. Class 32 is intended to promote infill development within urbanized areas. The class consists of environmentally benign in-fill projects that are consistent with local general plan and zoning requirements. Class 32 is

not intended to be applied to projects that would result in any significant traffic, noise, air quality, or water quality effects. Application of this exemption, as all categorical exemptions, is limited by certain exceptions identified in Section 15300.2 of the CEQA Guidelines” (p. 6).

As demonstrated above, according to CEQA Guidelines § 15332, a project can only be characterized as an in-fill development and qualify for a Class 32 Categorical Exemption if approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality. The Exemption claims that the Project would result in less-than-significant air quality impacts (p. 2). However, this claim is unsubstantiated and the Project’s air quality analysis is insufficient for the following reasons:

- 1) The Exemption relies upon an incorrect and unsubstantiated air model;
- 2) The Exemption fails to adequately evaluate diesel particulate matter emissions; and
- 3) SWAPE’s screening-level HRA indicates a potentially significant health risk impact.

1) Incorrect and Unsubstantiated Air Model

The Project’s air quality analysis relies on emissions calculated with the California Emissions Estimator Model (“CalEEMod”) Version 2016.3.2 (p. 52).¹ CalEEMod provides recommended default values based on site-specific information, such as land use type, meteorological data, total lot acreage, project type and typical equipment associated with project type. If more specific project information is known, the user can change the default values and input project-specific values, but the California Environmental Quality Act (“CEQA”) requires that such changes be justified by substantial evidence. Once all of the values are inputted into the model, the Project’s construction and operational emissions are calculated, and “output files” are generated. These output files disclose to the reader what parameters are utilized in calculating the Project’s air pollutant emissions and make known which default values are changed as well as provide justification for the values selected.

When reviewing the Project’s CalEEMod output files, provided in the Air Quality Modeling Worksheets (“AQ Worksheet”) and Greenhouse Gas Emissions Worksheets (“GHG Worksheet”) as Attachments 5 and 6 to the Exemption, respectively, we found that several model inputs were not consistent with information disclosed in the Project documents. As a result, the Project’s construction and operational emissions are underestimated. A full CEQA analysis should be prepared to include an updated air quality analysis that adequately evaluates the impacts that construction and operation of the Project will have on local and regional air quality.

Unsubstantiated Changes to Off-Road Construction Equipment Input Parameters

Review of the CalEEMod output files demonstrates that the “TENTEN Hollywood Project – Phase I Construction and Operation” and “TENTEN Hollywood Project – Phase II Construction and Operation” models include several changes to the default off-road construction equipment input parameters (see excerpt below) (Attachment 5, pp. 370, 399, 428, 457; Attachment 6, pp. 531, 566).

¹ “CalEEMod Version 2020.4.0.” California Air Pollution Control Officers Association (CAPCOA), May 2021, available at: <https://www.aqmd.gov/caleemod/download-model>.

TENTEN Hollywood Project – Phase I Construction and Operation:

Table Name	Column Name	Default Value	New Value
tblOffRoadEquipment	LoadFactor	0.31	0.31
tblOffRoadEquipment	LoadFactor	0.38	0.38
tblOffRoadEquipment	OffRoadEquipmentType		Aerial Lifts
tblOffRoadEquipment	OffRoadEquipmentType		Aerial Lifts
tblOffRoadEquipment	OffRoadEquipmentType		Excavators
tblOffRoadEquipment	OffRoadEquipmentType		Concrete/Industrial Saws
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00

TENTEN Hollywood Project – Phase II Construction and Operation:

Table Name	Column Name	Default Value	New Value
tblOffRoadEquipment	LoadFactor	0.38	0.38
tblOffRoadEquipment	LoadFactor	0.31	0.31
tblOffRoadEquipment	LoadFactor	0.31	0.31
tblOffRoadEquipment	OffRoadEquipmentType		Excavators
tblOffRoadEquipment	OffRoadEquipmentType		Aerial Lifts
tblOffRoadEquipment	OffRoadEquipmentType		Aerial Lifts
tblOffRoadEquipment	OffRoadEquipmentType		Concrete/Industrial Saws
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	4.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00

As previously mentioned, the CalEEMod User’s Guide requires any changes to model defaults be justified.² According to the “User Entered Comments & Non-Default Data” table, the justification provided for these changes is:

“Equipment use on worst-case day” (Attachment 5, pp. 369, 398; Attachment 6, pp. 530).

However, this justification is insufficient, as the Exemption and associated documents fail to mention or justify revised off-road construction equipment input parameters whatsoever. This is incorrect, as according to the CalEEMod User’s Guide:

“CalEEMod was also designed to allow the user to change the defaults to reflect site- or project-specific information, when available, provided that the information is supported by substantial evidence as required by CEQA.”³

As such, until additional information becomes available that substantiates the revised load factors, equipment types, and unit amounts, we are unable to verify that the changes included in the models are an accurate reflection of the proposed construction equipment.

² “CalEEMod User’s Guide.” California Air Pollution Control Officers Association (CAPCOA), May 2021, available at: <https://www.aqmd.gov/caleemod/user's-guide>, p. 1, 14.

³ “CalEEMod User’s Guide.” California Air Pollution Control Officers Association (CAPCOA), May 2021, available at: <https://www.aqmd.gov/caleemod/user's-guide>, p. 13, 14.

These unsubstantiated changes present an issue, as CalEEMod uses the off-road equipment input parameters to calculate the emissions associated with off-road construction equipment.⁴ By including unsubstantiated changes to the default off-road construction equipment unit amounts, the models may underestimate the Project’s construction-related emissions and should not be relied upon to determine Project significance.

Unsubstantiated Reductions to Number of Worker Trips

Review of the CalEEMod output files demonstrates that the “TENTEN Hollywood Project – Phase I Construction and Operation” and “TENTEN Hollywood Project – Phase II Construction and Operation” models include several changes to the default worker trips numbers (see excerpt below) (Attachment 5, pp. 371, 400, 429, 458; Attachment 6, pp. 532, 567).

Table Name	Column Name	Default Value	New Value
tblTripsAndVMT	WorkerTripNumber	10.00	8.00
tblTripsAndVMT	WorkerTripNumber	15.00	10.00

As previously mentioned, the CalEEMod User’s Guide requires any changes to model defaults be justified.⁵ According to the “User Entered Comments & Non-Default Data” table, the justification provided for these changes is:

“Export based on 14 cy haul truck capacity” (Attachment 5, pp. 369, 398, 427, 456; Attachment 6, pp. 530, 565).

However, these changes remain unsupported, as the justification only references hauling trips and fails to acknowledge the number of worker trips included in the model. Furthermore, the Exemption and associated documents fail to mention or justify the revised worker trip numbers whatsoever. As such, we cannot verify the changes.

These unsubstantiated reductions present an issue, as CalEEMod uses the worker trip numbers to estimate the construction-related emissions associated with on-road vehicles.⁶ Thus, by including unsubstantiated changes to the default worker trip numbers, the models may underestimate the Project’s mobile-source construction-related emissions and should not be relied upon to determine Project significance.

Overestimated Number of Trees for Sequestration

Review of the CalEEMod output files demonstrates that the “TENTEN Hollywood Project – Phase I Construction and Operation,” “TENTEN Hollywood Project – Phase II Construction and Operation,” and

⁴ “CalEEMod User’s Guide.” California Air Pollution Control Officers Association (CAPCOA), May 2021, available at: <https://www.aqmd.gov/caleemod/user's-guide>, p. 33, 34.

⁵ “CalEEMod User’s Guide.” California Air Pollution Control Officers Association (CAPCOA), May 2021, available at: <https://www.aqmd.gov/caleemod/user's-guide>, p. 1, 14.

⁶ “CalEEMod User’s Guide.” California Air Pollution Control Officers Association (CAPCOA), May 2021, available at: <https://www.aqmd.gov/caleemod/user's-guide>, p. 34.

“TENTEN Hollywood Project – Combined Operational Emissions Only” models include the sequestration of 43 new trees (see excerpts below) (Attachment 5, pp. 370, 399, 428, 457; Attachment 5 pp. 531, 566):

TENTEN Hollywood Project – Phase I Construction and Operation:

Table Name	Column Name	Default Value	New Value
tblSequestration	NumberOfNewTrees	0.00	12.00

TENTEN Hollywood Project – Phase II Construction and Operation:

Table Name	Column Name	Default Value	New Value
tblSequestration	NumberOfNewTrees	0.00	31.00

TENTEN Hollywood Project – Combined Operational Emissions Only:

Table Name	Column Name	Default Value	New Value
tblSequestration	NumberOfNewTrees	0.00	43.00

As demonstrated above, the models assume that the proposed Project would plant a total of 43 new trees. As previously mentioned, the CalEEMod User’s Guide requires any changes to model defaults be justified.⁷ According to the “User Entered Comments & Non-Default Data” table, the justifications provided for these assumptions are:

- “12 trees required per LAMC” (Attachment 5, pp. 369, 398, Attachment 6, pp. 530);
- “31 trees required per LAMC” (Attachment 5, pp. 427, 456; Attachment 6, pp. 565); and
- “43 trees provided per LAMC” (Attachment 5, pp. 485, 506; Attachment 6, pp. 600).

However, the Exemption states:

“The Proposed Project includes the removal of 22 on-site trees... The Proposed Project would include 20,440 square feet of common open space, with 10,726 square feet of landscaped area and 43 trees in accordance with the LAMC” (p. 1).

As the Project also proposes to remove 22 on-site trees, the Project would only plant 21 net trees.⁸ Thus, the model should have only included a total of 21 trees for sequestration. Therefore, the models are inconsistent with the information provided in the Exemption and overestimate the number of net trees.

This presents an issue, as CalEEMod uses the number of new trees to reduce the Project’s greenhouse gas (“GHG”) emissions due to the sequestration from new trees (see excerpt below).⁹

⁷ “CalEEMod User’s Guide.” California Air Pollution Control Officers Association (CAPCOA), May 2021, available at: <https://www.aqmd.gov/caleemod/user's-guide>, p. 1, 14.

⁸ Calculated: 43 proposed new trees – 22 removed trees = 21 total trees for sequestration.

⁹ “Appendix A – Calculation Details for CalEEMod.” California Air Pollution Control Officers Association (CAPCOA), May 2021, available at: <https://www.aqmd.gov/caleemod/user's-guide>, p. 58.

$$\text{Total Sequestered CO}_2 = (\text{Growing Period} \times \sum_{i=1}^n [\text{Sequestration } i \times \text{Trees } i])$$

Where:

Growing Period = Growing period for all trees, expressed in years (20).

n = Number of broad species classes.

Sequestration i = Default annual CO₂ accumulation per tree for broad species class i .

Trees i = Number of net new trees of broad species class i .

As demonstrated above, there is a direct relationship between the number of net new trees and total sequestered carbon dioxide (“CO₂”). Thus, when the number of new trees is increased, the total CO₂ emitted as a result of the proposed Project decreases. As such, by including an overestimated number of net new trees, the models may artificially reduce the Project’s GHG emissions and should not be relied upon to determine Project significance.

Incorrect Application of Operational Area-Related Mitigation Measure

Review of the CalEEMod output files demonstrates that the “TENTEN Hollywood Project – Combined Operational Emissions Only” model includes the following energy-related mitigation measures (see excerpt below) (Attachment 6, pp. 391, 392, 420, 421, 449, 450, 478, 479, 520, 521, Attachment 6, pp. 554, 555, 589, 590, 616, 617):

6.1 Mitigation Measures Area

No Hearths Installed
Use Low VOC Cleaning Supplies

As previously mentioned, the CalEEMod User’s Guide requires any changes to model defaults be justified.¹⁰ However, the “User Entered Comments & Non-Default Data” table fails to provide a justification for the inclusion of the above-mentioned operational energy-related mitigation measure. Furthermore, the Exemption states:

The Proposed Project, once operational, would not use hazardous materials other than modest amounts of typical cleaning supplies and solvents used for housekeeping and janitorial purposes that are typically associated with the operation of the Proposed Project and the use of these substances would comply with State Health Codes and Regulations” (p. 68, 69).

However, the inclusion of the above-mentioned mitigation measure remains unsupported, as the Exemption only indicates that the Project would use typical cleaning supplies and therefore fails to mention or explicitly require the use of low VOC supplies whatsoever. This is incorrect, as according to the AEP *CEQA Portal Topic Paper* on Mitigation Measures:

¹⁰ “CalEEMod User’s Guide.” California Air Pollution Control Officers Association (CAPCOA), May 2021, available at: <https://www.aqmd.gov/calceemod/user's-guide>, p. 1, 14.

“While not ‘mitigation’, a good practice is to include those project design feature(s) that address environmental impacts in the mitigation monitoring and reporting program (MMRP). Often the MMRP is all that accompanies building and construction plans through the permit process. If the design features are not listed as important to addressing an environmental impact, it is easy for someone not involved in the original environmental process to approve a change to the project that could eliminate one or more of the design features without understanding the resulting environmental impact.”¹¹

As demonstrated above, project design features are not mitigation measures and may be eliminated from the Project’s design. Thus, as use of low VOC cleaning supplies on the Project site is not formally included as a mitigation measure, we cannot guarantee that it would be implemented, monitored, and enforced on the Project site. As a result, the inclusion of the above-mentioned area-related operational mitigation measure in the model is incorrect. By including an operational mitigation measure without properly committing to its implementation, the model may underestimate the Project’s operational emissions and should not be relied upon to determine Project significance.

2) Diesel Particulate Matter Emissions Inadequately Evaluated

The Exemption fails to mention the toxic air contaminant (“TAC”) emissions associated with Project construction or operation or evaluate the Project’s health risk impacts whatsoever. This is incorrect for three reasons.

First, by failing to prepare a quantified construction and operational health risk analysis (“HRA”), the Project is inconsistent with CEQA’s requirement to make “a reasonable effort to substantively connect a project’s air quality impacts to likely health consequences.”¹² This poses a problem, as construction of the Project would produce DPM emissions through the exhaust stacks of construction equipment over a duration of approximately 48 months (p. 29). Furthermore, the VMT Analysis/Transportation Impact Study (“TIS”), provided as Attachment 3 to the Exemption, indicates that operation of the Project is anticipated to generate 508 daily vehicle trips, which would produce additional exhaust emissions and continue to expose nearby, existing sensitive receptors to DPM emissions (pp. 123). However, the Exemption fails to evaluate the TAC emissions associated with Project construction and operation or indicate the concentrations at which such pollutants would trigger adverse health effects. Thus, without making a reasonable effort to connect the Project’s TAC emissions to the potential health risks posed to nearby receptors, the Exemption is inconsistent with CEQA’s requirement to correlate Project-generated emissions with potential adverse impacts on human health.

Second, the Office of Environmental Health Hazard Assessment (“OEHHA”), the organization responsible for providing guidance on conducting HRAs in California, released its most recent *Risk Assessment Guidelines: Guidance Manual for Preparation of Health Risk Assessments* in February 2015. This guidance document describes the types of projects that warrant the preparation of an HRA. Specifically,

¹¹ “CEQA Portal Topic Paper Mitigation Measures.” AEP, February 2020, available at: <https://cegaportal.org/tp/CEQA%20Mitigation%202020.pdf>, p. 6.

¹² “Sierra Club v. County of Fresno.” Supreme Court of California, December 2018, available at: <https://cegaportal.org/decisions/1907/Sierra%20Club%20v.%20County%20of%20Fresno.pdf>.

OEHHA recommends that all short-term projects lasting at least 2 months assess cancer risks.¹³ Furthermore, according to OEHHA:

“Exposure from projects lasting more than 6 months should be evaluated for the duration of the project. In all cases, for assessing risk to residential receptors, the exposure should be assumed to start in the third trimester to allow for the use of the ASFs (OEHHA, 2009).”¹⁴

Thus, as the Project’s anticipated construction duration exceeds the 2-month and 6-month requirements set forth by OEHHA, construction of the Project meets the threshold warranting a quantified HRA under OEHHA guidance and should be evaluated for the entire 48-month construction period. Furthermore, OEHHA recommends that an exposure duration of 30 years should be used to estimate the individual cancer risk at the maximally exposed individual resident (“MEIR”).¹⁵ While the Exemption fails to provide the expected lifetime of the proposed Project, we can reasonably assume that the Project would operate for at least 30 years, if not more. Therefore, operation of the Project also exceeds the 2-month and 6-month requirements set forth by OEHHA and should be evaluated for the entire 30-year residential exposure duration, as indicated by OEHHA guidance. These recommendations reflect the most recent state health risk policies, and as such, a full CEQA analysis should be prepared to include an analysis of health risk impacts posed to nearby sensitive receptors from Project-generated DPM emissions.

Third, by claiming a less-than-significant impact without conducting a quantified construction or operational HRA for nearby, existing sensitive receptors, the Exemption fails to compare the Project’s excess cancer risk to the SCAQMD’s specific numeric threshold of 10 in one million.¹⁶ Thus, in accordance with the most relevant guidance, an assessment of the health risk posed to nearby, existing receptors as a result of Project construction and operation should be conducted.

3) Screening-Level Analysis Demonstrates Potentially Significant Health Risk Impact

In order to conduct our screening-level risk assessment we relied upon AERSCREEN, which is a screening level air quality dispersion model.¹⁷ The model replaced SCREEN3, and AERSCREEN is included in the OEHHA and the California Air Pollution Control Officers Associated (“CAPCOA”) guidance as the appropriate air dispersion model for Level 2 health risk screening assessments (“HRSAs”).^{18, 19} A Level 2

¹³ “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. 8-18.

¹⁴ “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. 8-18.

¹⁵ “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. 2-4.

¹⁶ “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>.

¹⁷ “AERSCREEN Released as the EPA Recommended Screening Model,” U.S. EPA, April 2011, available at: http://www.epa.gov/ttn/scram/guidance/clarification/20110411_AERSCREEN_Release_Memo.pdf

¹⁸ “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>.

¹⁹ “Health Risk Assessments for Proposed Land Use Projects.” CAPCOA, July 2009, available at: http://www.capcoa.org/wp-content/uploads/2012/03/CAPCOA_HRA_LU_Guidelines_8-6-09.pdf.

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.

We prepared a preliminary HRA of the Project's construction and operational health risk impact to residential sensitive receptors using the annual PM₁₀ exhaust estimates from the Exemption's CalEEMod output files. Consistent with recommendations set forth by OEHHA, we assumed residential exposure begins during the third trimester stage of life.²⁰ The Exemption's CalEEMod model indicates that construction activities will generate approximately 224 pounds of DPM over the 1,513-day construction period.²¹ 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:

$$\text{Emission Rate} \left(\frac{\text{grams}}{\text{second}} \right) = \frac{223.8 \text{ lbs}}{1,513 \text{ days}} \times \frac{453.6 \text{ grams}}{\text{lbs}} \times \frac{1 \text{ day}}{24 \text{ hours}} \times \frac{1 \text{ hour}}{3,600 \text{ seconds}} = \mathbf{0.000776 \text{ g/s}}$$

Using this equation, we estimated a construction emission rate of 0.000776 grams per second ("g/s"). Subtracting the 1513-day construction period from the total residential duration of 30 years, we assumed that after Project construction, the sensitive receptor would be exposed to the Project's operational DPM for an additional 29.5 years. The Exemption's operational CalEEMod emissions indicate that operational activities will generate approximately 47 net 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:

$$\text{Emission Rate} \left(\frac{\text{grams}}{\text{second}} \right) = \frac{46.6 \text{ lbs}}{365 \text{ days}} \times \frac{453.6 \text{ grams}}{\text{lbs}} \times \frac{1 \text{ day}}{24 \text{ hours}} \times \frac{1 \text{ hour}}{3,600 \text{ seconds}} = \mathbf{0.000670 \text{ g/s}}$$

Using this equation, we estimated an operational emission rate of 0.000670 g/s. Construction and operation were simulated as a 2.4-acre rectangular area source in AERSCREEN, with approximate dimensions of 139- by 70-meters. A release height of three meters was selected to represent the height of stacks of 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. The population of Los Angeles was obtained from U.S. 2020 Census data.²²

The AERSCREEN model generates maximum reasonable estimates of single-hour DPM concentrations from the Project Site. The United States Environmental Protection Agency ("U.S. EPA") suggests that the

²⁰ "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. 8-18.

²¹ See Attachment A for health risk calculations.

²² "Los Angeles." U.S. Census Bureau, 2020, available at: <https://datacommons.org/place/geold/0644000>.

annualized average concentration of an air pollutant be estimated by multiplying the single-hour concentration by 10% in screening procedures.²³ According to the Exemption, the nearest sensitive receptors are multi-family residences immediately surrounding the Project site (p. 53, 54). However, review of the AERSCREEN output files demonstrates that the MEIR is located approximately 75 meters from the Project site. Thus, the single-hour concentration estimated by AERSCREEN for Project construction is approximately 1.873 $\mu\text{g}/\text{m}^3$ DPM at approximately 75 meters downwind. Multiplying this single-hour concentration by 10%, we get an annualized average concentration of 0.1873 $\mu\text{g}/\text{m}^3$ for Project construction at the MEIR. For Project operation, the single-hour concentration estimated by AERSCREEN is 1.617 $\mu\text{g}/\text{m}^3$ DPM at approximately 75 meters downwind. Multiplying this single-hour concentration by 10%, we get an annualized average concentration of 0.1617 $\mu\text{g}/\text{m}^3$ for Project operation at the MEIR.

We calculated the excess cancer risk to the MEIR using applicable HRA methodologies prescribed by OEHHA, as recommended by SCAQMD.²⁴ Specifically, guidance from OEHHA and the California Air Resources Board (“CARB”) recommends the use of a standard point estimate approach, including high-point estimate (i.e. 95th percentile) breathing rates and age sensitivity factors (“ASF”) in order to account for the increased sensitivity to carcinogens during early-in-life exposure and accurately assess risk for susceptible subpopulations such as children. The residential exposure parameters, such as the daily breathing rates (“BR/BW”), exposure duration (“ED”), age sensitivity factors (“ASF”), fraction of time at home (“FAH”), and exposure frequency (“EF”) utilized for the various age groups in our screening-level HRA are as follows:

²³ “Screening Procedures for Estimating the Air Quality Impact of Stationary Sources Revised.” U.S. EPA, October 1992, available at: http://www.epa.gov/ttn/scram/guidance/guide/EPA-454R-92-019_OCR.pdf.

²⁴ “AB 2588 and Rule 1402 Supplemental Guidelines.” SCAQMD, October 2020, available at: <http://www.aqmd.gov/docs/default-source/planning/risk-assessment/ab-2588-supplemental-guidelines.pdf?sfvrsn=19>, p. 2.

Exposure Assumptions for Residential Individual Cancer Risk

Age Group	Breathing Rate (L/kg-day)²⁵	Age Sensitivity Factor²⁶	Exposure Duration (years)	Fraction of Time at Home²⁷	Exposure Frequency (days/year)²⁸	Exposure Time (hours/day)
3rd Trimester	361	10	0.25	1	350	24
Infant (0 - 2)	1090	10	2	1	350	24
Child (2 - 16)	572	3	14	1	350	24
Adult (16 - 30)	261	1	14	0.73	350	24

For the inhalation pathway, the procedure requires the incorporation of several discrete variates to effectively quantify dose for each age group. Once determined, contaminant dose is multiplied by the cancer potency factor (“CPF”) in units of inverse dose expressed in milligrams per kilogram per day (mg/kg/day⁻¹) to derive the cancer risk estimate. Therefore, to assess exposures, we utilized the following dose algorithm:

$$Dose_{AIR,per\ age\ group} = C_{air} \times EF \times \left[\frac{BR}{BW} \right] \times A \times CF$$

where:

- Dose_{AIR} = dose by inhalation (mg/kg/day), per age group
- C_{air} = concentration of contaminant in air (µg/m³)
- EF = exposure frequency (number of days/365 days)
- BR/BW = daily breathing rate normalized to body weight (L/kg/day)
- A = inhalation absorption factor (default = 1)
- CF = conversion factor (1x10⁻⁶, µg to mg, L to m³)

To calculate the overall cancer risk, we used the following equation for each appropriate age group:

$$Cancer\ Risk_{AIR} = Dose_{AIR} \times CPF \times ASF \times FAH \times \frac{ED}{AT}$$

²⁵ “Supplemental Guidelines for Preparing Risk Assessments for the Air Toxics ‘Hot Spots’ Information and Assessment Act.” SCAQMD, October 2020, available at: <http://www.aqmd.gov/docs/default-source/planning/risk-assessment/ab-2588-supplemental-guidelines.pdf?sfvrsn=19>, p. 19; 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>.

²⁶ “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. 8-5, Table 8.3.

²⁷ “Risk Assessment Procedures.” SCAQMD, August 2017, available at: http://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1401/riskassessmentprocedures_2017_080717.pdf, p. 7.

²⁸ “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. 5-24.

where:

- Dose_{AIR} = dose by inhalation (mg/kg/day), per age group
- CPF = cancer potency factor, chemical-specific (mg/kg/day)⁻¹
- ASF = age sensitivity factor, per age group
- FAH = fraction of time at home, per age group (for residential receptors only)
- ED = exposure duration (years)
- AT = averaging time period over which exposure duration is averaged (always 70 years)

Consistent with the 1,513-day construction schedule, the annualized average concentration for construction was used for the entire third trimester of pregnancy (0.25 years) and the first 1.12 years of the infantile stage of life (0 – 2 years). The annualized average concentration for operation was used for the remainder of the 30-year exposure period, which makes up the latter 0.88 years of the infantile stage of life, as well as the entire child (2 – 16) and adult (16 – 30 years) stages of life. The results of our calculations are shown in the table below.

The Maximally Exposed Individual at an Existing Residential Receptor				
Age Group	Emissions Source	Duration (years)	Concentration (ug/m3)	Cancer Risk
3rd Trimester	Construction	0.25	0.1873	2.55E-06
Infant (0 - 2)	Construction	2	0.1873	6.15E-05
	<i>Construction</i>	<i>1.90</i>	<i>0.1873</i>	<i>9.18E-06</i>
	<i>Operation</i>	<i>12.10</i>	<i>0.1617</i>	<i>5.06E-05</i>
Child (2 - 16)	Total	14		5.98E-05
Adult (16 - 30)	Operation	14	0.1617	6.50E-06
Lifetime		30		1.30E-04

As demonstrated, the excess cancer risks for the 3rd trimester of pregnancy, infants, children, and adults at the MEIR located approximately 75 meters away, over the course of Project construction and operation, are approximately 2.55, 61.5, 59.8, 6.50 in one million, respectively. The excess cancer risk over the course of a residential lifetime (30 years) is approximately 130 in one million. The infant and lifetime cancer risks exceed the SCAQMD threshold of 10 in one million, thus resulting in a potentially significant impact not previously addressed or identified by the Exemption.

Our analysis represents a screening-level HRA, which is known to be conservative and tends to err on the side of health protection. The purpose of the screening-level HRA is to demonstrate the potential link between Project-generated emissions and adverse health risk impacts. According to the U.S. EPA:

“EPA’s Exposure Assessment Guidelines recommend completing exposure assessments iteratively using a tiered approach to ‘strike a balance between the costs of adding detail and refinement to an assessment and the benefits associated with that additional refinement’ (U.S. EPA, 1992).

In other words, an assessment using basic tools (e.g., simple exposure calculations, default values, rules of thumb, conservative assumptions) can be conducted as the first phase (or tier) of the overall assessment (i.e., a screening-level assessment).

The exposure assessor or risk manager can then determine whether the results of the screening-level assessment warrant further evaluation through refinements of the input data and exposure assumptions or by using more advanced models.”

As demonstrated above, screening-level analyses warrant further evaluation in a refined modeling approach. Thus, as our screening-level HRA demonstrates that construction and operation of the Project could result in a potentially significant health risk impact, a full CEQA analysis should be prepared to include a refined health risk analysis which adequately and accurately evaluates health risk impacts associated with both Project construction and operation.

Greenhouse Gas

Failure to Adequately Evaluate Greenhouse Gas Impacts

As discussed above, the Exemption fails to demonstrate that the Project would result in a less-than-significant health risk impact. Thus, the Exemption’s claim that the Project is exempt pursuant to CEQA Guidelines § 15332 should not be relied upon. As a result, a full CEQA analysis should be prepared evaluating the Project’s potential greenhouse gas (“GHG”) emissions. The Exemption estimates that the Project would generate net annual greenhouse gas (“GHG”) emissions of 1,641.97 metric tons of carbon dioxide equivalents per year (“MT CO₂e/year”) (p. 66, Table 2.10).

**Table 2.10
Proposed Project Operational Greenhouse Gas Emissions**

Emissions Source	Estimated Project Generated CO₂e Emissions (Metric Tons per Year)
Area	2.92
Energy	820.80
Mobile (Motor Vehicles)	626.37
Stationary	9.17
Waste	19.55
Water	110.44
Construction Emissions ^a	52.72
Proposed Project Net Total:	1,641.97
<i>Notes: ^a The total construction GHG emissions were amortized over 30 years and added to the operation of the Project. Calculation data and results provided in Attachment 6 to this Categorical Exemption. Source: Parker Environmental Consultants, 2020.</i>	

The Exemption continues, stating:

“As shown in Table 2.10, below, the net increase in GHG emissions generated by the Proposed Project would result in a net increase of approximately 1,642 CO₂e MTY, which is well below the draft 3,000 MTCO₂e per year threshold of significance considered by the SCAQMD, but not adopted by the City” (p. 65).

As demonstrated above, the Exemption claims that the Project would not exceed the SCAQMD interim bright-line threshold of 3,000 MT CO₂e/year. Furthermore, the Exemption’s analysis relies upon the Project’s consistency with the CARB 2017 Scoping Plan and SCAG’s 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (“RTP/SCS”) to conclude that the Project would result in a less-than-significant GHG impact (p. 65 - 68). However, the Exemption’s analysis, as well as the subsequent less-than-significant impact conclusion, is incorrect for five reasons.

- (1) The IS’s quantitative GHG analysis relies upon an incorrect and unsubstantiated air model;
- (2) The IS’s quantitative GHG analysis relies upon an outdated threshold;
- (3) The IS fails to identify a potentially significant impact;
- (4) The IS fails to consider the performance-based standards under CARB’s *Scoping Plan*; and
- (5) The IS fails to consider the performance-based standards under SCAG’s RTP/SCS.

1) Incorrect and Unsubstantiated Quantitative Analysis of Emissions

As previously stated, the Exemption estimates that the Project would generate net annual GHG emissions of 1,641.97 MT CO₂e/year (p. 66, Table 2.10). However, the Exemption’s quantitative GHG analysis is unsubstantiated. As previously discussed, when we reviewed the Project’s CalEEMod output files, provided in the AQ Worksheet and the GHG Worksheet as Attachments 5 and 6 to the Exemption, we found that several of the values inputted into the models are not consistent with information disclosed in the Exemption. As a result, the models underestimate the Project’s emissions, and the Exemption’s quantitative GHG analysis should not be relied upon to determine Project significance. A full CEQA analysis should be prepared that adequately assesses the potential GHG impacts that construction and operation of the proposed Project may have on the environment.

2) Incorrect Reliance on an Outdated Quantitative GHG Threshold

As previously stated, the Exemption estimates that the Project would generate net annual GHG emissions of 1,641.97 MT CO₂e/year, which would not exceed the SCAQMD interim threshold of 3,000 MT CO₂e/year (p. 66, Table 2.10). However, the guidance that provided the 3,000 MT CO₂e/year threshold, SCAQMD’s 2008 *Interim CEQA GHG Significance Threshold for Stationary Sources, Rules, and Plans* report, was developed when the Global Warming Solutions Act of 2006, commonly known as “AB 32”, was the governing statute for GHG reductions in California. AB 32 requires California to reduce GHG emissions to 1990 levels by 2020.²⁹ Furthermore, AEP guidance states:

²⁹ HEALTH & SAFETY CODE 38550, available at: https://leginfo.ca.gov/faces/codes_displaySection.xhtml?lawCode=HSC§ionNum=38550.

“[F]or evaluating projects with a post 2020 horizon, the threshold will need to be revised based on a new gap analysis that would examine 17 development and reduction potentials out to the next GHG reduction milestone.”³⁰

As it is currently September 2022, thresholds for 2020 are not applicable to the proposed Project and should be revised to reflect the current GHG reduction target. As such, the SCAQMD interim threshold of 3,000 MT CO₂e/year is outdated and inapplicable to the proposed Project, and the Exemption’s less-than-significant GHG impact conclusion should not be relied upon. Instead, we recommend that the Project apply the SCAQMD 2035 service population efficiency target of 3.0 metric tons of carbon dioxide equivalents per service population per year (“MT CO₂e/SP/year”), which was calculated by applying a 40% reduction to the 2020 targets.³¹

3) Failure to Identify a Potentially Significant GHG Impact

In an effort to quantitatively evaluate the Project’s GHG emissions, we compared the Project’s GHG emissions, as estimated by the Exemption, to the SCAQMD 2035 efficiency target of 3.0 MT CO₂e/SP/year. When applying this threshold, the Project’s incorrect and unsubstantiated air model indicates a potentially significant GHG impact.

As previously stated, the Exemption estimates that the Project would generate net annual GHG emissions of 1,641.97 MT CO₂e/year (p. 66, Table 2.10). According to CAPCOA’s *CEQA & Climate Change* report, a service population (“SP”) is defined as “the sum of the number of residents and the number of jobs supported by the project.”³² According to the Exemption, the Project would support 381 residents (p. 38). As the Project is not expected to support any employees, we estimate an SP of 381 people.³³ When dividing the Project’s net annual GHG emissions, as estimated by the IS, by a SP of 381 people, we find that the Project would emit approximately 3.6 MT CO₂e/SP/year (see table below).³⁴

IS Greenhouse Gas Emissions	
Annual Emissions (MT CO ₂ e/year)	1,641.97
Service Population	381
Service Population Efficiency (MT CO ₂ e/SP/year)	4.31
SCAQMD Threshold	3.0
<i>Exceeds?</i>	Yes

³⁰ “Beyond Newhall and 2020: A Field Guide to New CEQA Greenhouse Gas Thresholds and Climate Action Plan Targets for California.” Association of Environmental Professionals (AEP), October 2016, *available at*: https://califaep.org/docs/AEP-2016_Final_White_Paper.pdf, p. 39.

³¹ “Minutes for the GHG CEQA Significance Threshold Stakeholder Working Group #15.” SCAQMD, September 2010, *available at*: [http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-\(ghg\)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-15/ghg-meeting-15-minutes.pdf](http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-15/ghg-meeting-15-minutes.pdf), p. 2.

³² “CEQA & Climate Change.” California Air Pollution Control Officers Association (CAPCOA), January 2008, *available at*: <http://www.capcoa.org/wp-content/uploads/2012/03/CAPCOA-White-Paper.pdf>, p. 71, 72.

³³ Calculated: 381 residents + 0 employees = 381 total SP.

³⁴ Calculated: (1,641.97 MT CO₂e/year) / (381 SP) = (4.31 MT CO₂e/SP/year).

As demonstrated above, the Project’s service population efficiency value, as estimated by the IS’s net annual GHG emissions estimates and SP, exceeds the SCAQMD 2035 efficiency target of 3.0 MT CO₂e/SP/year, indicating a potentially significant impact not previously identified or addressed by the IS. As a result, the Exemption’s less-than-significant GHG impact conclusion should not be relied upon. An full CEQA analysis should be prepared, including an updated GHG analysis and incorporating additional mitigation measures to reduce the Project’s GHG emissions to less-than-significant levels.

4) Failure to Consider Performance-based Standards Under CARB’s 2017 Scoping Plan

As previously discussed, the Exemption concludes that the Project would be consistent with CARB’s 2017 Climate Change Scoping Plan (p. 65 - 68). However, this is incorrect, as the Exemption fails to consider performance-based measures proposed by CARB.

i. Passenger & Light Duty VMT Per Capita Benchmarks per SB 375

In reaching the State’s long-term GHG emission reduction goals, CARB’s 2017 *Scoping Plan* explicitly cites to SB 375 and the VMT reductions anticipated under the implementation of Sustainable Community Strategies.³⁵ CARB has identified the population and daily VMT from passenger autos and light-duty vehicles at the state and county level for each year between 2010 to 2050 under a “baseline scenario” that includes “current projections of VMT included in the existing Regional Transportation Plans/Sustainable Communities Strategies (RTP/SCSs) adopted by the State’s 18 Metropolitan Planning Organizations (MPOs) pursuant to SB 375 as of 2015.”³⁶ By dividing the projected daily VMT by the population, we calculated the daily VMT per capita for each year at the state and county level for 2010 (baseline year), 2025 (Project operational year), and 2030 (target years under SB 32) (see table below).

2017 Scoping Plan Daily VMT Per Capita

Year	Los Angeles County			State		
	Population	LDV VMT Baseline	VMT Per Capita	Population	LDV VMT Baseline	VMT Per Capita
2010	9,838,771	216,979,221.64	22.05	37,335,085	836,463,980.46	22.40
2025	10,671,800	217,340,094.90	20.37	42,326,397	929,443,512.65	21.96
2030	10,868,614	215,539,586.12	19.83	43,939,250	957,178,153.19	21.78

As the Exemption fails to evaluate the Project’s consistency with the CARB 2017 *Scoping Plan* performance-based daily VMT per capita projections, the Exemption’s claim that the proposed Project would not conflict with the CARB 2017 *Scoping Plan* is unsupported. A full CEQA analysis should be prepared for the proposed Project to provide additional information and analysis to conclude less-than-significant GHG impacts.

³⁵ “California’s 2017 Climate Change Scoping Plan.” CARB, November 2017, *available at*: https://ww3.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf, p. 25, 98, 101-103.

³⁶ “Supporting Calculations for 2017 Scoping Plan-Identified VMT Reductions,” California Air Resources Board (CARB), January 2019, *available at*: <https://ww2.arb.ca.gov/resources/documents/carb-2017-scoping-plan-identified-vmt-reductions-and-relationship-state-climate>; *see also*: https://ww2.arb.ca.gov/sites/default/files/2019-01/sp_mss_vmt_calculations_jan19_0.xlsx.

5) Failure to Consider Performance-based Standards under SCAG's RTP/SCS

As previously discussed, the Exemption concludes that the Project would be consistent with SCAG's RTP/SCS (p. 67, 68). However, the IS fails to consider whether or not the Project meets any of the specific performance-based goals underlying SCAG's RTP/SCS and SB 375, such as: i) per capita GHG emission targets, or ii) daily vehicles miles traveled ("VMT") per capita benchmarks.

i. SB 375 Per Capita GHG Emission Goals

SB 375 was signed into law in September 2008 to enhance the state's ability to reach AB 32 goals by directing CARB to develop regional 2020 and 2035 GHG emission reduction targets for passenger vehicles (autos and light-duty trucks). In March 2018, CARB adopted updated regional targets requiring a 19 percent decrease in VMT for the SCAG region by 2035. This goal is reflected in SCAG's 2020 RTP/SCS Program Environmental Impact Report ("PEIR"), in which the 2020 RTP/SCS PEIR updates the per capita emissions to 18.8 lbs/day in 2035 (see excerpt below).³⁷

**Table 3.8-10
SB 375 Analysis**

	2005 (Baseline)	2020 (Plan)	2035 (Plan)
Resident population (per 1,000)	17,161	19,194	21,110
CO2 emissions (per 1,000 tons)	204.0 ^{a/}	204.5 ^{b/}	198.6 ^{b/}
Per capita emissions (pounds/day)	23.8	21.3	18.8
% difference from Plan (2020) to Baseline (2005)			-8%
% difference from Plan (2035) to Baseline (2005)			-19% ^{c/}

Note:

/a/ Based on EMFAC2007

/b/ Based on EMFAC2014 and SCAG modeling, 2019.

/c/ Includes off-model adjustments for 2035 and 2045

Source: SCAG modeling, 2019.

<http://www.scag.ca.gov/committees/CommitteeDocLibrary/jointRCPC110515fullagn.pdf>

As the Exemption fails to evaluate the Project's consistency with the SCAG's per capita emissions, the Exemption's claim that the proposed Project would be consistent with SCAG's RTP/SCS is unsupported. A full CEQA analysis should be prepared for the proposed Project to provide additional information and analysis to conclude less-than-significant GHG impacts.

ii. SB 375 RTP/SCS Daily VMT Per Capita Target

Under the SCAG's 2020 RTP/SCS, daily VMT per capita in the SCAG region should decrease from 23.2 VMT in 2016 to 20.7 VMT by 2045.³⁸ Daily VMT per capita in Los Angeles County should decrease from 22.2 to 19.2 VMT during that same period.³⁹ Here, however, the Exemption fails to consider any of the

³⁷ "Connect SoCal Certified Final Program Environmental Impact Report." SCAG, May 2020, available at: https://scag.ca.gov/sites/main/files/file-attachments/fpeir_connectsocial_complete.pdf?1607981618, p. 3.8-74.

³⁸ "Connect SoCal." SCAG, September 2020, available at: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial-plan_0.pdf?1606001176, pp. 138.

³⁹ "Connect SoCal." SCAG, September 2020, available at: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial-plan_0.pdf?1606001176, pp. 138.

above-mentioned performance-based VMT targets. As the Exemption fails to evaluate the Project’s consistency with the SCAG’s performance-based daily VMT per capita projections, the IS’s claim that the proposed Project would be consistent with SCAG’s RTP/SCS is unsupported. A full CEQA analysis should be prepared for the proposed Project to provide additional information and analysis to conclude less-than-significant GHG impacts.

Mitigation

Feasible Mitigation Measures Available to Reduce Emissions

Our analysis demonstrates that the Project would result in potentially significant health risk and GHG impacts that should be mitigated further. As such, in an effort to reduce the Project’s emissions, we identified several mitigation measures that are applicable to the proposed Project. Therefore, to reduce the Project’s emissions, we recommend consideration of SCAG’s 2020 RTP/SCS PEIR’s Air Quality Project Level Mitigation Measures (“PMM-AQ-1”) and Greenhouse Gas Project Level Mitigation Measures (“PMM-GHG-1”), as described below:⁴⁰

SCAG RTP/SCS 2020-2045
Air Quality Project Level Mitigation Measures – PMM-AQ-1:
In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i> , a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to violating air quality standards. Such measures may include the following or other comparable measures identified by the Lead Agency:
a) Minimize land disturbance.
b) Suspend grading and earth moving when wind gusts exceed 25 miles per hour unless the soil is wet enough to prevent dust plumes.
c) Cover trucks when hauling dirt.
d) Stabilize the surface of dirt piles if not removed immediately.
e) Limit vehicular paths on unpaved surfaces and stabilize any temporary roads.
f) Minimize unnecessary vehicular and machinery activities.
g) Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway.
h) Revegetate disturbed land, including vehicular paths created during construction to avoid future off-road vehicular activities.
i) On Caltrans projects, Caltrans Standard Specifications 10-Dust Control, 17-Watering, and 18-Dust Palliative shall be incorporated into project specifications.

⁴⁰ “4.0 Mitigation Measures.” Connect SoCal Program Environmental Impact Report Addendum #1, September 2020, available at: https://scag.ca.gov/sites/main/files/file-attachments/fpeir_connectsocial_addendum_4_mitigationmeasures.pdf?1606004420, p. 4.0-2 – 4.0-10; 4.0-19 – 4.0-23; See also: “Certified Final Connect SoCal Program Environmental Impact Report.” Southern California Association of Governments (SCAG), May 2020, available at: <https://scag.ca.gov/peir>.

j) Require contractors to assemble a comprehensive inventory list (i.e., make, model, engine year, horsepower, emission rates) of all heavy-duty off-road (portable and mobile) equipment (50 horsepower and greater) that could be used an aggregate of 40 or more hours for the construction project. Prepare a plan for approval by the applicable air district demonstrating achievement of the applicable percent reduction for a CARB-approved fleet.
k) Ensure that all construction equipment is properly tuned and maintained.
l) Minimize idling time to 5 minutes—saves fuel and reduces emissions.
m) Provide an operational water truck on-site at all times. Use watering trucks to minimize dust; watering should be sufficient to confine dust plumes to the project work areas. Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway.
n) Utilize existing power sources (e.g., power poles) or clean fuel generators rather than temporary power generators.
o) Develop a traffic plan to minimize traffic flow interference from construction activities. The plan may include advance public notice of routing, use of public transportation, and satellite parking areas with a shuttle service. Schedule operations affecting traffic for off-peak hours. Minimize obstruction of through-traffic lanes. Provide a flag person to guide traffic properly and ensure safety at construction sites.
p) As appropriate require that portable engines and portable engine-driven equipment units used at the project work site, with the exception of on-road and off-road motor vehicles, obtain CARB Portable Equipment Registration with the state or a local district permit. Arrange appropriate consultations with the CARB or the District to determine registration and permitting requirements prior to equipment operation at the site.
q) Require projects within 500 feet of residences, hospitals, or schools to use Tier 4 equipment for all engines above 50 horsepower (hp) unless the individual project can demonstrate that Tier 4 engines would not be required to mitigate emissions below significance thresholds.
r) Projects located within the South Coast Air Basin should consider applying for South Coast AQMD “SOON” funds which provides funds to applicable fleets for the purchase of commercially available low-emission heavy-duty engines to achieve near-term reduction of NOx emissions from in-use off-road diesel vehicles.
s) Projects located within AB 617 communities should review the applicable Community Emissions Reduction Plan (CERP) for additional mitigation that can be applied to individual projects.
t) Where applicable, projects should provide information about air quality related programs to schools, including the Environmental Justice Community Partnerships (EJCP), Clean Air Ranger Education (CARE), and Why Air Quality Matters programs.
u) Projects should work with local cities and counties to install adequate signage that prohibits truck idling in certain locations (e.g., near schools and sensitive receptors).
v) As applicable for airport projects, the following measures should be considered...
w) As applicable for port projects, the following measures should be considered: <ul style="list-style-type: none"> - Develop specific timelines for transitioning to zero emission cargo handling equipment (CHE) - Develop interim performance standards with a minimum amount of CHE replacement each year to ensure adequate progress. - Use short side electric power for ships, which may include tugboats and other ocean-going vessels or develop incentives to gradually ramp up the usage of shore power. - Install the appropriate infrastructure to provide shore power to operate the ships. Electrical hookups should be appropriately sized. - Maximize participation in the Port of Los Angeles’ Vessel Speed Reduction Program or the Port of Long Beach’s Green Flag Initiation Program in order to reduce the speed of vessel transiting within 40 nautical miles of Point Fermin. - Encourage the participation in the Green Ship Incentives. - Offer incentives to encourage the use of on-dock rail.
x) As applicable for rail projects, the following measures should be considered...

y) Projects that will introduce sensitive receptors within 500 feet of freeways and other sources should consider installing high efficiency of enhanced filtration units, such as Minimum Efficiency Reporting Value (MERV) 13 or better. Installation of enhanced filtration units can be verified during occupancy inspection prior to the issuance of an occupancy permit.

z) Develop an ongoing monitoring, inspection, and maintenance program for the MERV filters.

aa) Consult the SCAG Environmental Justice Toolbox for potential measures to address impacts to low-income and/or minority communities.

bb) The following criteria related to diesel emissions shall be implemented on by individual project sponsors as appropriate and feasible:

- Diesel nonroad vehicles on site for more than 10 total days shall have either (1) engines that meet EPA on road emissions standards or (2) emission control technology verified by EPA or CARB to reduce PM emissions by a minimum of 85%
- Diesel generators on site for more than 10 total days shall be equipped with emission control technology verified by EPA or CARB to reduce PM emissions by a minimum of 85%.
- Nonroad diesel engines on site shall be Tier 2 or higher.
- Diesel nonroad construction equipment on site for more than 10 total days shall have either (1) engines meeting EPA Tier 4 nonroad emissions standards or (2) emission control technology verified by EPA or CARB for use with nonroad engines to reduce PM emissions by a minimum of 85% for engines for 50 hp and greater and by a minimum of 20% for engines less than 50 hp.
- Emission control technology shall be operated, maintained, and serviced as recommended by the emission control technology manufacturer.
- Diesel vehicles, construction equipment, and generators on site shall be fueled with ultra-low sulfur diesel fuel (ULSD) or a biodiesel blend approved by the original engine manufacturer with sulfur content of 15 ppm or less.
- The construction contractor shall maintain a list of all diesel vehicles, construction equipment, and generators to be used on site. The list shall include the following:
 - i. Contractor and subcontractor name and address, plus contact person responsible for the vehicles or equipment.
 - ii. Equipment type, equipment manufacturer, equipment serial number, engine manufacturer, engine model year, engine certification (Tier rating), horsepower, engine serial number, and expected fuel usage and hours of operation.
 - iii. For the emission control technology installed: technology type, serial number, make, model, manufacturer, EPA/CARB verification number/level, and installation date and hour-meter reading on installation date.
- The contractor shall establish generator sites and truck-staging zones for vehicles waiting to load or unload material on site. Such zones shall be located where diesel emissions have the least impact on abutters, the general public, and especially sensitive receptors such as hospitals, schools, daycare facilities, elderly housing, and convalescent facilities.
- The contractor shall maintain a monthly report that, for each on road diesel vehicle, nonroad construction equipment, or generator onsite, includes:
 - i. Hour-meter readings on arrival on-site, the first and last day of every month, and on off-site date.
 - ii. Any problems with the equipment or emission controls.
 - iii. Certified copies of fuel deliveries for the time period that identify:
 - 1. Source of supply
 - 2. Quantity of fuel
 - 3. Quantity of fuel, including sulfur content (percent by weight)

cc) Project should exceed Title-24 Building Envelope Energy Efficiency Standards (California Building Standards Code). The following measures can be used to increase energy efficiency:

- Provide pedestrian network improvements, such as interconnected street network, narrower roadways and shorter block lengths, sidewalks, accessibility to transit and transit shelters, traffic calming measures, parks and public spaces, minimize pedestrian barriers.

- Provide traffic calming measures, such as:
 - i. Marked crosswalks
 - ii. Count-down signal timers
 - iii. Curb extensions
 - iv. Speed tables
 - v. Raised crosswalks
 - vi. Raised intersections
 - vii. Median islands
 - viii. Tight corner radii
 - ix. Roundabouts or mini-circles
 - x. On-street parking
 - xi. Chicanes/chokers
- Create urban non-motorized zones
- Provide bike parking in non-residential and multi-unit residential projects
- Dedicate land for bike trails
- Limit parking supply through:
 - i. Elimination (or reduction) of minimum parking requirements
 - ii. Creation of maximum parking requirements
 - iii. Provision of shared parking
- Require residential area parking permit.
- Provide ride-sharing programs
 - i. Designate a certain percentage of parking spacing for ride sharing vehicles
 - ii. Designating adequate passenger loading and unloading and waiting areas for ride-sharing vehicles
 - iii. Providing a web site or messaging board for coordinating rides
 - iv. Permanent transportation management association membership and finding requirement.

Greenhouse Gas Project Level Mitigation Measures – PMM-GHG-1

In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the *State CEQA Guidelines*, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to violating air quality standards. Such measures may include the following or other comparable measures identified by the Lead Agency:

b) Reduce emissions resulting from projects through implementation of project features, project design, or other measures, such as those described in Appendix F of the State CEQA Guidelines.

c) Include off-site measures to mitigate a project’s emissions.

- d) Measures that consider incorporation of Best Available Control Technology (BACT) during design, construction and operation of projects to minimize GHG emissions, including but not limited to:
- i. Use energy and fuel-efficient vehicles and equipment;
 - ii. Deployment of zero- and/or near zero emission technologies;
 - iii. Use lighting systems that are energy efficient, such as LED technology;
 - iv. Use the minimum feasible amount of GHG-emitting construction materials;
 - v. Use cement blended with the maximum feasible amount of flash or other materials that reduce GHG emissions from cement production;
 - vi. Incorporate design measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse;
 - vii. Incorporate design measures to reduce energy consumption and increase use of renewable energy;
 - viii. Incorporate design measures to reduce water consumption;
 - ix. Use lighter-colored pavement where feasible;
 - x. Recycle construction debris to maximum extent feasible;

<ul style="list-style-type: none"> xi. Plant shade trees in or near construction projects where feasible; and xii. Solicit bids that include concepts listed above.
<p>e) Measures that encourage transit use, carpooling, bike-share and car-share programs, active transportation, and parking strategies, including, but not limited to the following:</p> <ul style="list-style-type: none"> i. Promote transit-active transportation coordinated strategies; ii. Increase bicycle carrying capacity on transit and rail vehicles; iii. Improve or increase access to transit; iv. Increase access to common goods and services, such as groceries, schools, and day care; v. Incorporate affordable housing into the project; vi. Incorporate the neighborhood electric vehicle network; vii. Orient the project toward transit, bicycle and pedestrian facilities; viii. Improve pedestrian or bicycle networks, or transit service; ix. Provide traffic calming measures; x. Provide bicycle parking; xi. Limit or eliminate park supply; xii. Unbundle parking costs; xiii. Provide parking cash-out programs; xiv. Implement or provide access to commute reduction program;
<p>f) Incorporate bicycle and pedestrian facilities into project designs, maintaining these facilities, and providing amenities incentivizing their use; and planning for and building local bicycle projects that connect with the regional network;</p>
<p>g) Improving transit access to rail and bus routes by incentives for construction and transit facilities within developments, and/or providing dedicated shuttle service to transit stations; and</p>
<p>h) Adopting employer trip reduction measures to reduce employee trips such as vanpool and carpool programs, providing end-of-trip facilities, and telecommuting programs including but not limited to measures that:</p> <ul style="list-style-type: none"> i. Provide car-sharing, bike sharing, and ride-sharing programs; ii. Provide transit passes; iii. Shift single occupancy vehicle trips to carpooling or vanpooling, for example providing ride-matching services; iv. Provide incentives or subsidies that increase that use of modes other than single-occupancy vehicle; v. Provide on-site amenities at places of work, such as priority parking for carpools and vanpools, secure bike parking, and showers and locker rooms; vi. Provide employee transportation coordinators at employment sites; vii. Provide a guaranteed ride home service to users of non-auto modes.
<p>i) Designate a percentage of parking spaces for ride-sharing vehicles or high-occupancy vehicles, and provide adequate passenger loading and unloading for those vehicles;</p>
<p>j) Land use siting and design measures that reduce GHG emissions, including:</p> <ul style="list-style-type: none"> i. Developing on infill and brownfields sites; ii. Building compact and mixed-use developments near transit; iii. Retaining on-site mature trees and vegetation, and planting new canopy trees; iv. Measures that increase vehicle efficiency, encourage use of zero and low emissions vehicles, or reduce the carbon content of fuels, including constructing or encouraging construction of electric vehicle charging stations or neighborhood electric vehicle networks, or charging for electric bicycles; and

v. Measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse.
k) Consult the SCAG Environmental Justice Toolbox for potential measures to address impacts to low-income and/or minority communities. The measures provided above are also intended to be applied in low income and minority communities as applicable and feasible.
l) Require at least five percent of all vehicle parking spaces include electric vehicle charging stations, or at a minimum, require the appropriate infrastructure to facilitate sufficient electric charging for passenger vehicles and trucks to plug-in.
m) Encourage telecommuting and alternative work schedules, such as: <ul style="list-style-type: none"> i. Staggered starting times ii. Flexible schedules iii. Compressed work weeks
n) Implement commute trip reduction marketing, such as: <ul style="list-style-type: none"> i. New employee orientation of trip reduction and alternative mode options ii. Event promotions iii. Publications
o) Implement preferential parking permit program
p) Implement school pool and bus programs
q) Price workplace parking, such as: <ul style="list-style-type: none"> i. Explicitly charging for parking for its employees; ii. Implementing above market rate pricing; iii. Validating parking only for invited guests; iv. Not providing employee parking and transportation allowances; and v. Educating employees about available alternatives.

These measures offer a cost-effective, feasible way to incorporate lower-emitting design features into the proposed Project, which subsequently, reduce emissions released during Project construction and operation. A full CEQA analysis should be prepared to include all feasible mitigation measures, as well as include updated health risk and GHG analyses to ensure that the necessary mitigation measures are implemented to reduce emissions to below thresholds. The analysis should also demonstrate a commitment to the implementation of these measures prior to Project approval, to ensure that the Project’s significant emissions are reduced to the maximum extent possible.

Disclaimer

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

Sincerely,

A handwritten signature in blue ink that reads "Matt Hagemann". The signature is fluid and cursive, with a long horizontal stroke at the end.

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

A handwritten signature in blue ink that reads "Paul Rosenfeld". The signature is cursive and clearly legible.

Paul E. Rosenfeld, Ph.D.

Attachment A: Health Risk Calculations
Attachment B: AERSCREEN Output Files
Attachment C: Matt Hagemann CV
Attachment D: Paul Rosenfeld CV

Construction		Total	
2021			
Annual Emissions (tons/year)	0.0399	Total DPM (lbs)	223.7682192
Daily Emissions (lbs/day)	0.218630137	Total DPM (g)	101501.2642
Construction Duration (days)	213	Emission Rate (g/s)	0.000776459
Total DPM (lbs)	46.56821918	Release Height (meters)	3
Total DPM (g)	21123.34422	Total Acreage	2.4
Start Date	6/2/2021	Max Horizontal (meters)	139.37
End Date	1/1/2022	Min Horizontal (meters)	69.69
Construction Days	213	Initial Vertical Dimension (meters)	1.5
2022		Setting	Urban
Annual Emissions (tons/year)	0.052	Population	3,849,297
Daily Emissions (lbs/day)	0.284931507	Start Date	6/2/2021
Construction Duration (days)	365	End Date	7/24/2025
Total DPM (lbs)	104	Total Construction Days	1513
Total DPM (g)	47174.4	Total Years of Construction	4.15
Start Date	1/1/2022	Total Years of Operation	25.85
End Date	1/1/2023		
Construction Days	365		
2023			
Annual Emissions (tons/year)	0.0366		
Daily Emissions (lbs/day)	0.200547945		
Construction Duration (days)	365		
Total DPM (lbs)	73.2		
Total DPM (g)	33203.52		
Start Date	1/1/2023		
End Date	1/1/2024		
Construction Days	365		
2024			
Annual Emissions (tons/year)	0.0408		
Daily Emissions (lbs/day)	0.223561644		
Construction Duration (days)	366		
Total DPM (lbs)	81.82356164		
Total DPM (g)	37115.16756		
Start Date	1/1/2024		
End Date	1/1/2025		
Construction Days	366		
2025			
Annual Emissions (tons/year)	0.0187		
Daily Emissions (lbs/day)	0.102465753		
Construction Duration (days)	204		
Total DPM (lbs)	20.9030137		
Total DPM (g)	9481.607014		
Start Date	1/1/2025		
End Date	7/24/2025		
Construction Days	204		

Operation	
Emission Rate	
Annual Emissions (tons/year)	0.0233
Daily Emissions (lbs/day)	0.127671233
Total DPM (lbs)	46.6
Emission Rate (g/s)	0.000670274
Release Height (meters)	3
Total Acreage	2.4
Max Horizontal (meters)	139.37
Min Horizontal (meters)	69.69
Initial Vertical Dimension (meters)	1.5
Setting	Urban
Population	3,849,297

Start date and time 09/16/22 13:34:09

AERSCREEN 21112

Tenten Hollywood, Construction

Tenten Hollywood, Construction

----- DATA ENTRY VALIDATION -----

METRIC

ENGLISH

** AREADATA **

Emission Rate:	0.776E-03 g/s	0.616E-02 lb/hr
Area Height:	3.00 meters	9.84 feet
Area Source Length:	139.37 meters	457.25 feet
Area Source Width:	69.69 meters	228.64 feet
Vertical Dimension:	1.50 meters	4.92 feet
Model Mode:	URBAN	
Population:	3849297	
Dist to Ambient Air:	1.0 meters	3. feet

** BUILDING DATA **

No Building Downwash Parameters

** TERRAIN DATA **

No Terrain Elevations

Source Base Elevation: 0.0 meters 0.0 feet

Probe distance: 5000. meters 16404. feet

No flagpole receptors

No discrete receptors used

** FUMIGATION DATA **

No fumigation requested

** METEOROLOGY DATA **

Min/Max Temperature: 250.0 / 310.0 K -9.7 / 98.3 Deg F

Minimum Wind Speed: 0.5 m/s

Anemometer Height: 10.000 meters

Dominant Surface Profile: Urban

Dominant Climate Type: Average Moisture

Surface friction velocity (u*): not adjusted

DEBUG OPTION ON

AERSCREEN output file:

2022.09.16_TentenHollywood_AERSCREENConstruction.out

*** AERSCREEN Run is Ready to Begin

No terrain used, AERMAP will not be run

SURFACE CHARACTERISTICS & MAKEMET

Obtaining surface characteristics...

Using AERMET seasonal surface characteristics for Urban with Average Moisture

Season	Albedo	Bo	zo
Winter	0.35	1.50	1.000
Spring	0.14	1.00	1.000
Summer	0.16	2.00	1.000
Autumn	0.18	2.00	1.000

Creating met files aerscreen_01_01.sfc & aerscreen_01_01.pfl

Creating met files aerscreen_02_01.sfc & aerscreen_02_01.pfl

Creating met files aerscreen_03_01.sfc & aerscreen_03_01.pfl

Creating met files aerscreen_04_01.sfc & aerscreen_04_01.pfl

Buildings and/or terrain present or rectangular area source, skipping probe

FLOWSECTOR started 09/16/22 13:36:00

Running AERMOD

Processing Winter

Processing surface roughness sector 1

Processing wind flow sector 1

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Winter sector 0

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 2

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Winter sector 5

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 3

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Winter sector 10

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 4

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Winter sector 15

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 5

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Winter sector 20

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 6

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Winter sector 25

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 7

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Winter sector 30

***** WARNING MESSAGES *****

*** NONE ***

Running AERMOD

Processing Spring

Processing surface roughness sector 1

Processing wind flow sector 1

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Spring sector 0

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 2

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Spring sector 5

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 3

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Spring sector 10

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 4

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Spring sector 15

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 5

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Spring sector 20

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 6

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Spring sector 25

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 7

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Spring sector 30

***** WARNING MESSAGES *****

*** NONE ***

Running AERMOD

Processing Summer

Processing surface roughness sector 1

Processing wind flow sector 1

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Summer sector 0

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 2

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Summer sector 5

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 3

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Summer sector 10

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 4

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Summer sector 15

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 5

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Summer sector 20

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 6

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Summer sector 25

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 7

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Summer sector 30

***** WARNING MESSAGES *****

*** NONE ***

Running AERMOD

Processing Autumn

Processing surface roughness sector 1

Processing wind flow sector 1

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Autumn sector 0

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 2

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Autumn sector 5

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 3

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Autumn sector 10

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 4

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Autumn sector 15

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 5

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Autumn sector 20

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 6

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Autumn sector 25

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 7

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Autumn sector 30

***** WARNING MESSAGES *****

*** NONE ***

FLOWSECTOR ended 09/16/22 13:36:09

REFINE started 09/16/22 13:36:09

AERMOD Finishes Successfully for REFINE stage 3 Winter sector 0

***** WARNING MESSAGES *****

*** NONE ***

REFINE ended 09/16/22 13:36:10

AERSCREEN Finished Successfully

With no errors or warnings

Check log file for details

Ending date and time 09/16/22 13:36:12

Concentration		Distance		Elevation		Diag	Season/Month		Zo sector		Date		
H0	U*	W*	DT/DZ	ZICNV	ZIMCH	M-O	LEN	Z0	BOWEN	ALBEDO	REF	WS	HT
REF	TA	HT											
	0.15159E+01		1.00	0.00	0.0			Winter		0-360	10011001		
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0	
	310.0	2.0											
	0.17093E+01		25.00	0.00	0.0			Winter		0-360	10011001		
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0	
	310.0	2.0											
	0.18493E+01		50.00	0.00	0.0			Winter		0-360	10011001		
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0	
	310.0	2.0											
*	0.18815E+01		73.00	0.00	20.0			Winter		0-360	10011001		
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0	
	310.0	2.0											
	0.18729E+01		75.00	0.00	20.0			Winter		0-360	10011001		
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0	
	310.0	2.0											
	0.10518E+01		100.00	0.00	15.0			Winter		0-360	10011001		
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0	
	310.0	2.0											
	0.73760E+00		125.00	0.00	0.0			Winter		0-360	10011001		
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0	
	310.0	2.0											
	0.56091E+00		150.00	0.00	0.0			Winter		0-360	10011001		
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0	
	310.0	2.0											
	0.44688E+00		175.00	0.00	0.0			Winter		0-360	10011001		
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0	
	310.0	2.0											
	0.36852E+00		200.00	0.00	0.0			Winter		0-360	10011001		
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0	
	310.0	2.0											
	0.31139E+00		225.00	0.00	0.0			Winter		0-360	10011001		
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0	
	310.0	2.0											
	0.26812E+00		250.00	0.00	0.0			Winter		0-360	10011001		
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0	
	310.0	2.0											
	0.23446E+00		275.00	0.00	0.0			Winter		0-360	10011001		
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0	
	310.0	2.0											
	0.20766E+00		300.00	0.00	0.0			Winter		0-360	10011001		
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0	
	310.0	2.0											
	0.18560E+00		325.00	0.00	0.0			Winter		0-360	10011001		
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0	
	310.0	2.0											
	0.16738E+00		350.00	0.00	0.0			Winter		0-360	10011001		
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0	

310.0	2.0											
	0.15212E+00	375.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.13909E+00	400.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.12786E+00	425.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.11814E+00	450.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.10965E+00	475.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.10216E+00	500.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.95512E-01	525.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.89592E-01	550.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.84270E-01	575.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.79461E-01	600.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.75112E-01	625.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.71167E-01	650.00	0.00	5.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.67570E-01	675.00	0.00	5.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.64278E-01	700.00	0.00	5.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.61257E-01	725.00	0.00	5.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.58476E-01	750.00	0.00	5.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.55906E-01	775.00	0.00	0.0		Winter	0-360	10011001				

0.30700E-01	1200.00	0.00	5.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0	
310.0 2.0						
0.29843E-01	1225.00	0.00	10.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0	
310.0 2.0						
0.29027E-01	1250.00	0.00	10.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0	
310.0 2.0						
0.28249E-01	1275.00	0.00	10.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0	
310.0 2.0						
0.27604E-01	1300.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0	
310.0 2.0						
0.26892E-01	1325.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0	
310.0 2.0						
0.26211E-01	1350.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0	
310.0 2.0						
0.25560E-01	1375.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0	
310.0 2.0						
0.24936E-01	1400.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0	
310.0 2.0						
0.24338E-01	1425.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0	
310.0 2.0						
0.23764E-01	1450.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0	
310.0 2.0						
0.23213E-01	1475.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0	
310.0 2.0						
0.22684E-01	1500.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0	
310.0 2.0						
0.22176E-01	1525.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0	
310.0 2.0						
0.21687E-01	1550.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0	
310.0 2.0						
0.21216E-01	1575.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0	
310.0 2.0						
0.20763E-01	1600.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0	

310.0	2.0											
0.20326E-01	1625.00	0.00	0.0		Winter	0-360	10011001					
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
0.19905E-01	1650.00	0.00	0.0		Winter	0-360	10011001					
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
0.19499E-01	1675.00	0.00	10.0		Winter	0-360	10011001					
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
0.19107E-01	1700.00	0.00	0.0		Winter	0-360	10011001					
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
0.18728E-01	1725.00	0.00	10.0		Winter	0-360	10011001					
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
0.18362E-01	1750.00	0.00	10.0		Winter	0-360	10011001					
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
0.18009E-01	1775.00	0.00	0.0		Winter	0-360	10011001					
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
0.17667E-01	1800.00	0.00	0.0		Winter	0-360	10011001					
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
0.17336E-01	1825.00	0.00	10.0		Winter	0-360	10011001					
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
0.17016E-01	1850.00	0.00	0.0		Winter	0-360	10011001					
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
0.16706E-01	1875.00	0.00	10.0		Winter	0-360	10011001					
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
0.16405E-01	1900.00	0.00	10.0		Winter	0-360	10011001					
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
0.16114E-01	1925.00	0.00	0.0		Winter	0-360	10011001					
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
0.15831E-01	1950.00	0.00	0.0		Winter	0-360	10011001					
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
0.15557E-01	1975.00	0.00	5.0		Winter	0-360	10011001					
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
0.15292E-01	2000.00	0.00	0.0		Winter	0-360	10011001					
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
0.15034E-01	2025.00	0.00	5.0		Winter	0-360	10011001					

0.11582E-01	2450.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0	2.0					
0.11422E-01	2475.00	0.00	5.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0	2.0					
0.11266E-01	2500.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0	2.0					
0.11113E-01	2525.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0	2.0					
0.10964E-01	2550.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0	2.0					
0.10819E-01	2575.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0	2.0					
0.10677E-01	2600.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0	2.0					
0.10538E-01	2625.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0	2.0					
0.10402E-01	2650.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0	2.0					
0.10269E-01	2675.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0	2.0					
0.10139E-01	2700.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0	2.0					
0.10012E-01	2725.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0	2.0					
0.98874E-02	2750.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0	2.0					
0.97657E-02	2775.00	0.00	15.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0	2.0					
0.96465E-02	2800.00	0.00	10.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0	2.0					
0.95298E-02	2825.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0	2.0					
0.94155E-02	2850.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0	2.0					

310.0	2.0											
	0.93036E-02	2875.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.91940E-02	2900.00	0.00	5.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.90866E-02	2925.00	0.00	10.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.89813E-02	2950.00	0.00	5.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.88782E-02	2975.00	0.00	10.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.87770E-02	3000.00	0.00	5.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.86779E-02	3025.00	0.00	10.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.85806E-02	3050.00	0.00	5.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.84853E-02	3075.00	0.00	10.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.83917E-02	3100.00	0.00	5.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.83000E-02	3125.00	0.00	10.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.82099E-02	3150.00	0.00	10.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.81216E-02	3174.99	0.00	10.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.80348E-02	3199.99	0.00	10.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.79497E-02	3225.00	0.00	10.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.78661E-02	3250.00	0.00	10.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.77840E-02	3275.00	0.00	0.0		Winter	0-360	10011001				

0.65869E-02	3700.00	0.00	20.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999.	21.	6.0	1.000	1.50	0.35	0.50 10.0
310.0 2.0						
0.65264E-02	3724.99	0.00	20.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999.	21.	6.0	1.000	1.50	0.35	0.50 10.0
310.0 2.0						
0.64670E-02	3750.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999.	21.	6.0	1.000	1.50	0.35	0.50 10.0
310.0 2.0						
0.64084E-02	3775.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999.	21.	6.0	1.000	1.50	0.35	0.50 10.0
310.0 2.0						
0.63508E-02	3800.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999.	21.	6.0	1.000	1.50	0.35	0.50 10.0
310.0 2.0						
0.62941E-02	3825.00	0.00	5.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999.	21.	6.0	1.000	1.50	0.35	0.50 10.0
310.0 2.0						
0.62382E-02	3849.99	0.00	15.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999.	21.	6.0	1.000	1.50	0.35	0.50 10.0
310.0 2.0						
0.61832E-02	3875.00	0.00	5.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999.	21.	6.0	1.000	1.50	0.35	0.50 10.0
310.0 2.0						
0.61290E-02	3900.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999.	21.	6.0	1.000	1.50	0.35	0.50 10.0
310.0 2.0						
0.60757E-02	3925.00	0.00	5.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999.	21.	6.0	1.000	1.50	0.35	0.50 10.0
310.0 2.0						
0.60231E-02	3950.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999.	21.	6.0	1.000	1.50	0.35	0.50 10.0
310.0 2.0						
0.59713E-02	3975.00	0.00	5.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999.	21.	6.0	1.000	1.50	0.35	0.50 10.0
310.0 2.0						
0.59203E-02	4000.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999.	21.	6.0	1.000	1.50	0.35	0.50 10.0
310.0 2.0						
0.58700E-02	4025.00	0.00	5.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999.	21.	6.0	1.000	1.50	0.35	0.50 10.0
310.0 2.0						
0.58205E-02	4050.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999.	21.	6.0	1.000	1.50	0.35	0.50 10.0
310.0 2.0						
0.57717E-02	4075.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999.	21.	6.0	1.000	1.50	0.35	0.50 10.0
310.0 2.0						
0.57236E-02	4100.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999.	21.	6.0	1.000	1.50	0.35	0.50 10.0

310.0	2.0											
	0.56762E-02	4125.00	0.00	5.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.56295E-02	4150.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.55834E-02	4175.00	0.00	5.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.55380E-02	4200.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.54932E-02	4225.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.54490E-02	4250.00	0.00	10.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.54054E-02	4275.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.53625E-02	4300.00	0.00	10.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.53201E-02	4325.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.52783E-02	4350.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.52371E-02	4375.00	0.00	10.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.51964E-02	4400.00	0.00	10.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.51563E-02	4425.00	0.00	5.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.51167E-02	4450.00	0.00	10.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.50777E-02	4475.00	0.00	10.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.50391E-02	4500.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.50010E-02	4525.00	0.00	10.0		Winter	0-360	10011001				

Start date and time 09/16/22 13:46:55

AERSCREEN 21112

Tenten Hollywood, Operations

Tenten Hollywood, Operations

----- DATA ENTRY VALIDATION -----

METRIC

ENGLISH

** AREADATA **

Emission Rate:	0.670E-03 g/s	0.532E-02 lb/hr
Area Height:	3.00 meters	9.84 feet
Area Source Length:	139.37 meters	457.25 feet
Area Source Width:	69.69 meters	228.64 feet
Vertical Dimension:	1.50 meters	4.92 feet
Model Mode:	URBAN	
Population:	3849297	
Dist to Ambient Air:	1.0 meters	3. feet

** BUILDING DATA **

No Building Downwash Parameters

** TERRAIN DATA **

No Terrain Elevations

Source Base Elevation: 0.0 meters 0.0 feet

Probe distance: 5000. meters 16404. feet

No flagpole receptors

No discrete receptors used

** FUMIGATION DATA **

No fumigation requested

** METEOROLOGY DATA **

Min/Max Temperature: 250.0 / 310.0 K -9.7 / 98.3 Deg F

Minimum Wind Speed: 0.5 m/s

Anemometer Height: 10.000 meters

Dominant Surface Profile: Urban

Dominant Climate Type: Average Moisture

Surface friction velocity (u*): not adjusted

DEBUG OPTION ON

AERSCREEN output file:

2022.09.16_TentenHollywood_AERSCREENOperations.out

*** AERSCREEN Run is Ready to Begin

No terrain used, AERMAP will not be run

SURFACE CHARACTERISTICS & MAKEMET

Obtaining surface characteristics...

Using AERMET seasonal surface characteristics for Urban with Average Moisture

Season	Albedo	Bo	zo
Winter	0.35	1.50	1.000
Spring	0.14	1.00	1.000
Summer	0.16	2.00	1.000
Autumn	0.18	2.00	1.000

Creating met files aerscreen_01_01.sfc & aerscreen_01_01.pfl

Creating met files aerscreen_02_01.sfc & aerscreen_02_01.pfl

Creating met files aerscreen_03_01.sfc & aerscreen_03_01.pfl

Creating met files aerscreen_04_01.sfc & aerscreen_04_01.pfl

Buildings and/or terrain present or rectangular area source, skipping probe

FLOWSECTOR started 09/16/22 13:49:25

Running AERMOD

Processing Winter

Processing surface roughness sector 1

Processing wind flow sector 1

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Winter sector 0

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 2

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Winter sector 5

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 3

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Winter sector 10

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 4

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Winter sector 15

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 5

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Winter sector 20

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 6

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Winter sector 25

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 7

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Winter sector 30

***** WARNING MESSAGES *****

*** NONE ***

Running AERMOD

Processing Spring

Processing surface roughness sector 1

Processing wind flow sector 1

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Spring sector 0

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 2

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Spring sector 5

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 3

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Spring sector 10

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 4

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Spring sector 15

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 5

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Spring sector 20

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 6

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Spring sector 25

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 7

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Spring sector 30

***** WARNING MESSAGES *****

*** NONE ***

Running AERMOD

Processing Summer

Processing surface roughness sector 1

Processing wind flow sector 1

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Summer sector 0

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 2

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Summer sector 5

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 3

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Summer sector 10

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 4

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Summer sector 15

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 5

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Summer sector 20

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 6

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Summer sector 25

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 7

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Summer sector 30

***** WARNING MESSAGES *****

*** NONE ***

Running AERMOD

Processing Autumn

Processing surface roughness sector 1

Processing wind flow sector 1

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Autumn sector 0

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 2

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Autumn sector 5

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 3

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Autumn sector 10

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 4

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Autumn sector 15

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 5

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Autumn sector 20

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 6

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Autumn sector 25

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 7

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Autumn sector 30

***** WARNING MESSAGES *****

*** NONE ***

FLOWSECTOR ended 09/16/22 13:49:34

REFINE started 09/16/22 13:49:34

AERMOD Finishes Successfully for REFINE stage 3 Winter sector 0

***** WARNING MESSAGES *****

*** NONE ***

REFINE ended 09/16/22 13:49:36

AERSCREEN Finished Successfully

With no errors or warnings

Check log file for details

Ending date and time 09/16/22 13:49:38

Concentration		Distance		Elevation		Diag	Season/Month		Zo sector		Date		
H0	U*	W*	DT/DZ	ZICNV	ZIMCH	M-O	LEN	Z0	BOWEN	ALBEDO	REF	WS	HT
REF	TA	HT											
	0.13087E+01		1.00	0.00	0.0			Winter		0-360	10011001		
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0	
	310.0	2.0											
	0.14756E+01		25.00	0.00	0.0			Winter		0-360	10011001		
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0	
	310.0	2.0											
	0.15965E+01		50.00	0.00	0.0			Winter		0-360	10011001		
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0	
	310.0	2.0											
*	0.16243E+01		73.00	0.00	20.0			Winter		0-360	10011001		
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0	
	310.0	2.0											
	0.16168E+01		75.00	0.00	20.0			Winter		0-360	10011001		
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0	
	310.0	2.0											
	0.90800E+00		100.00	0.00	15.0			Winter		0-360	10011001		
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0	
	310.0	2.0											
	0.63675E+00		125.00	0.00	0.0			Winter		0-360	10011001		
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0	
	310.0	2.0											
	0.48422E+00		150.00	0.00	0.0			Winter		0-360	10011001		
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0	
	310.0	2.0											
	0.38577E+00		175.00	0.00	0.0			Winter		0-360	10011001		
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0	
	310.0	2.0											
	0.31813E+00		200.00	0.00	0.0			Winter		0-360	10011001		
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0	
	310.0	2.0											
	0.26882E+00		225.00	0.00	0.0			Winter		0-360	10011001		
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0	
	310.0	2.0											
	0.23146E+00		250.00	0.00	0.0			Winter		0-360	10011001		
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0	
	310.0	2.0											
	0.20241E+00		275.00	0.00	0.0			Winter		0-360	10011001		
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0	
	310.0	2.0											
	0.17927E+00		300.00	0.00	0.0			Winter		0-360	10011001		
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0	
	310.0	2.0											
	0.16023E+00		325.00	0.00	0.0			Winter		0-360	10011001		
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0	
	310.0	2.0											
	0.14449E+00		350.00	0.00	0.0			Winter		0-360	10011001		
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0	

310.0	2.0											
	0.13132E+00	375.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.12008E+00	400.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.11038E+00	425.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.10198E+00	450.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.94657E-01	475.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.88189E-01	500.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.82453E-01	525.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.77342E-01	550.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.72748E-01	575.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.68596E-01	600.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.64842E-01	625.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.61437E-01	650.00	0.00	5.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.58331E-01	675.00	0.00	5.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.55489E-01	700.00	0.00	5.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.52882E-01	725.00	0.00	5.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.50481E-01	750.00	0.00	5.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.48262E-01	775.00	0.00	0.0		Winter	0-360	10011001				

0.26502E-01	1200.00	0.00	5.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0 2.0						
0.25763E-01	1225.00	0.00	10.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0 2.0						
0.25058E-01	1250.00	0.00	10.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0 2.0						
0.24386E-01	1275.00	0.00	10.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0 2.0						
0.23830E-01	1300.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0 2.0						
0.23215E-01	1325.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0 2.0						
0.22628E-01	1350.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0 2.0						
0.22065E-01	1375.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0 2.0						
0.21526E-01	1400.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0 2.0						
0.21010E-01	1425.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0 2.0						
0.20515E-01	1450.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0 2.0						
0.20039E-01	1475.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0 2.0						
0.19583E-01	1500.00	0.00	5.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0 2.0						
0.19144E-01	1525.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0 2.0						
0.18722E-01	1550.00	0.00	5.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0 2.0						
0.18315E-01	1575.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0 2.0						
0.17924E-01	1600.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0

310.0	2.0											
	0.17547E-01	1625.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.17183E-01	1650.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.16833E-01	1675.00	0.00	10.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.16494E-01	1700.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.16167E-01	1725.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.15852E-01	1750.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.15546E-01	1775.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.15251E-01	1800.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.14966E-01	1825.00	0.00	10.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.14689E-01	1850.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.14421E-01	1875.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.14162E-01	1900.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.13911E-01	1925.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.13667E-01	1950.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.13430E-01	1975.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.13201E-01	2000.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.12978E-01	2025.00	0.00	5.0		Winter	0-360	10011001				

0.99984E-02	2449.99	0.00	25.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0	2.0					
0.98603E-02	2475.00	0.00	5.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0	2.0					
0.97256E-02	2500.00	0.00	15.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0	2.0					
0.95939E-02	2525.00	0.00	20.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0	2.0					
0.94653E-02	2550.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0	2.0					
0.93397E-02	2575.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0	2.0					
0.92170E-02	2600.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0	2.0					
0.90970E-02	2625.00	0.00	5.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0	2.0					
0.89797E-02	2650.00	0.00	15.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0	2.0					
0.88649E-02	2675.00	0.00	25.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0	2.0					
0.87527E-02	2700.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0	2.0					
0.86430E-02	2725.00	0.00	20.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0	2.0					
0.85356E-02	2750.00	0.00	10.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0	2.0					
0.84305E-02	2775.00	0.00	10.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0	2.0					
0.83276E-02	2800.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0	2.0					
0.82268E-02	2825.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0	2.0					
0.81282E-02	2850.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0

310.0	2.0											
	0.80315E-02	2875.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.79369E-02	2900.00	0.00	5.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.78442E-02	2925.00	0.00	10.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.77533E-02	2950.00	0.00	5.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.76643E-02	2975.00	0.00	10.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.75770E-02	3000.00	0.00	5.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.74914E-02	3025.00	0.00	10.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.74074E-02	3050.00	0.00	5.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.73251E-02	3075.00	0.00	10.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.72444E-02	3100.00	0.00	5.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.71651E-02	3125.00	0.00	10.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.70874E-02	3150.00	0.00	5.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.70111E-02	3174.99	0.00	10.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.69363E-02	3200.00	0.00	5.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.68628E-02	3225.00	0.00	10.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.67906E-02	3250.00	0.00	5.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.67197E-02	3275.00	0.00	0.0		Winter	0-360	10011001				

0.56863E-02	3700.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0 2.0						
0.56341E-02	3725.00	0.00	15.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0 2.0						
0.55827E-02	3750.00	0.00	15.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0 2.0						
0.55322E-02	3775.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0 2.0						
0.54825E-02	3800.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0 2.0						
0.54335E-02	3825.00	0.00	5.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0 2.0						
0.53853E-02	3849.99	0.00	15.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0 2.0						
0.53378E-02	3875.00	0.00	5.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0 2.0						
0.52910E-02	3900.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0 2.0						
0.52449E-02	3925.00	0.00	5.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0 2.0						
0.51996E-02	3950.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0 2.0						
0.51549E-02	3975.00	0.00	5.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0 2.0						
0.51108E-02	4000.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0 2.0						
0.50674E-02	4025.00	0.00	5.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0 2.0						
0.50247E-02	4050.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0 2.0						
0.49826E-02	4075.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0 2.0						
0.49410E-02	4100.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0

310.0	2.0											
	0.49001E-02	4125.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.48598E-02	4150.00	0.00	10.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.48200E-02	4175.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.47808E-02	4200.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.47421E-02	4225.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.47040E-02	4250.00	0.00	10.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.46664E-02	4275.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.46293E-02	4300.00	0.00	10.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.45927E-02	4325.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.45566E-02	4350.00	0.00	10.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.45211E-02	4375.00	0.00	5.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.44859E-02	4400.00	0.00	10.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.44513E-02	4425.00	0.00	5.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.44171E-02	4450.00	0.00	10.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.43834E-02	4475.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.43501E-02	4500.00	0.00	10.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.43173E-02	4525.00	0.00	10.0		Winter	0-360	10011001				



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**Geologic and Hydrogeologic Characterization
Investigation and Remediation Strategies
Litigation Support and Testifying Expert
Industrial Stormwater Compliance
CEQA Review**

Education:

M.S. Degree, Geology, California State University Los Angeles, Los Angeles, CA, 1984.

B.A. Degree, Geology, Humboldt State University, Arcata, CA, 1982.

Professional Certifications:

California Professional Geologist

California Certified Hydrogeologist

Qualified SWPPP Developer and Practitioner

Professional Experience:

Matt has 30 years of experience in environmental policy, contaminant assessment and remediation, stormwater compliance, and CEQA review. He spent nine years with the U.S. EPA in the RCRA and Superfund programs and served as EPA's Senior Science Policy Advisor in the Western Regional Office where he identified emerging threats to groundwater from perchlorate and MTBE. While with EPA, Matt also served as a Senior Hydrogeologist in the oversight of the assessment of seven major military facilities undergoing base closure. He led numerous enforcement actions under provisions of the Resource Conservation and Recovery Act (RCRA) and directed efforts to improve hydrogeologic characterization and water quality monitoring. For the past 15 years, as a founding partner with SWAPE, Matt has developed extensive client relationships and has managed complex projects that include consultation as an expert witness and a regulatory specialist, and a manager of projects ranging from industrial stormwater compliance to CEQA review of impacts from hazardous waste, air quality and greenhouse gas emissions.

Positions Matt has held include:

- Founding Partner, Soil/Water/Air Protection Enterprise (SWAPE) (2003 – present);
- Geology Instructor, Golden West College, 2010 – 2014, 2017;
- Senior Environmental Analyst, Komex H2O Science, Inc. (2000 -- 2003);

- Executive Director, Orange Coast Watch (2001 – 2004);
- Senior Science Policy Advisor and Hydrogeologist, U.S. Environmental Protection Agency (1989–1998);
- Hydrogeologist, National Park Service, Water Resources Division (1998 – 2000);
- Adjunct Faculty Member, San Francisco State University, Department of Geosciences (1993 – 1998);
- Instructor, College of Marin, Department of Science (1990 – 1995);
- Geologist, U.S. Forest Service (1986 – 1998); and
- Geologist, Dames & Moore (1984 – 1986).

Senior Regulatory and Litigation Support Analyst:

With SWAPE, Matt’s responsibilities have included:

- Lead analyst and testifying expert in the review of over 300 environmental impact reports and negative declarations since 2003 under CEQA that identify significant issues with regard to hazardous waste, water resources, water quality, air quality, greenhouse gas emissions, and geologic hazards. Make recommendations for additional mitigation measures to lead agencies at the local and county level to include additional characterization of health risks and implementation of protective measures to reduce worker exposure to hazards from toxins and Valley Fever.
- Stormwater analysis, sampling and best management practice evaluation at more than 100 industrial facilities.
- Expert witness on numerous cases including, for example, perfluorooctanoic acid (PFOA) contamination of groundwater, MTBE litigation, air toxins at hazards at a school, CERCLA compliance in assessment and remediation, and industrial stormwater contamination.
- Technical assistance and litigation support for vapor intrusion concerns.
- Lead analyst and testifying expert in the review of environmental issues in license applications for large solar power plants before the California Energy Commission.
- Manager of a project to evaluate numerous formerly used military sites in the western U.S.
- Manager of a comprehensive evaluation of potential sources of perchlorate contamination in Southern California drinking water wells.
- Manager and designated expert for litigation support under provisions of Proposition 65 in the review of releases of gasoline to sources drinking water at major refineries and hundreds of gas stations throughout California.

With Komex H2O Science Inc., Matt’s duties included the following:

- Senior author of a report on the extent of perchlorate contamination that was used in testimony by the former U.S. EPA Administrator and General Counsel.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of MTBE use, research, and regulation.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of perchlorate use, research, and regulation.
- Senior researcher in a study that estimates nationwide costs for MTBE remediation and drinking water treatment, results of which were published in newspapers nationwide and in testimony against provisions of an energy bill that would limit liability for oil companies.
- Research to support litigation to restore drinking water supplies that have been contaminated by MTBE in California and New York.

- Expert witness testimony in a case of oil production-related contamination in Mississippi.
- Lead author for a multi-volume remedial investigation report for an operating school in Los Angeles that met strict regulatory requirements and rigorous deadlines.
- Development of strategic approaches for cleanup of contaminated sites in consultation with clients and regulators.

Executive Director:

As Executive Director with Orange Coast Watch, Matt led efforts to restore water quality at Orange County beaches from multiple sources of contamination including urban runoff and the discharge of wastewater. In reporting to a Board of Directors that included representatives from leading Orange County universities and businesses, Matt prepared issue papers in the areas of treatment and disinfection of wastewater and control of the discharge of grease to sewer systems. Matt actively participated in the development of countywide water quality permits for the control of urban runoff and permits for the discharge of wastewater. Matt worked with other nonprofits to protect and restore water quality, including Surfrider, Natural Resources Defense Council and Orange County CoastKeeper as well as with business institutions including the Orange County Business Council.

Hydrogeology:

As a Senior Hydrogeologist with the U.S. Environmental Protection Agency, Matt led investigations to characterize and cleanup closing military bases, including Mare Island Naval Shipyard, Hunters Point Naval Shipyard, Treasure Island Naval Station, Alameda Naval Station, Moffett Field, Mather Army Airfield, and Sacramento Army Depot. Specific activities were as follows:

- Led efforts to model groundwater flow and contaminant transport, ensured adequacy of monitoring networks, and assessed cleanup alternatives for contaminated sediment, soil, and groundwater.
- Initiated a regional program for evaluation of groundwater sampling practices and laboratory analysis at military bases.
- Identified emerging issues, wrote technical guidance, and assisted in policy and regulation development through work on four national U.S. EPA workgroups, including the Superfund Groundwater Technical Forum and the Federal Facilities Forum.

At the request of the State of Hawaii, Matt developed a methodology to determine the vulnerability of groundwater to contamination on the islands of Maui and Oahu. He used analytical models and a GIS to show zones of vulnerability, and the results were adopted and published by the State of Hawaii and County of Maui.

As a hydrogeologist with the EPA Groundwater Protection Section, Matt worked with provisions of the Safe Drinking Water Act and NEPA to prevent drinking water contamination. Specific activities included the following:

- Received an EPA Bronze Medal for his contribution to the development of national guidance for the protection of drinking water.
- Managed the Sole Source Aquifer Program and protected the drinking water of two communities through designation under the Safe Drinking Water Act. He prepared geologic reports, conducted

public hearings, and responded to public comments from residents who were very concerned about the impact of designation.

- Reviewed a number of Environmental Impact Statements for planned major developments, including large hazardous and solid waste disposal facilities, mine reclamation, and water transfer.

Matt served as a hydrogeologist with the RCRA Hazardous Waste program. Duties were as follows:

- Supervised the hydrogeologic investigation of hazardous waste sites to determine compliance with Subtitle C requirements.
- Reviewed and wrote "part B" permits for the disposal of hazardous waste.
- Conducted RCRA Corrective Action investigations of waste sites and led inspections that formed the basis for significant enforcement actions that were developed in close coordination with U.S. EPA legal counsel.
- Wrote contract specifications and supervised contractor's investigations of waste sites.

With the National Park Service, Matt directed service-wide investigations of contaminant sources to prevent degradation of water quality, including the following tasks:

- Applied pertinent laws and regulations including CERCLA, RCRA, NEPA, NRDA, and the Clean Water Act to control military, mining, and landfill contaminants.
- Conducted watershed-scale investigations of contaminants at parks, including Yellowstone and Olympic National Park.
- Identified high-levels of perchlorate in soil adjacent to a national park in New Mexico and advised park superintendent on appropriate response actions under CERCLA.
- Served as a Park Service representative on the Interagency Perchlorate Steering Committee, a national workgroup.
- Developed a program to conduct environmental compliance audits of all National Parks while serving on a national workgroup.
- Co-authored two papers on the potential for water contamination from the operation of personal watercraft and snowmobiles, these papers serving as the basis for the development of nationwide policy on the use of these vehicles in National Parks.
- Contributed to the Federal Multi-Agency Source Water Agreement under the Clean Water Action Plan.

Policy:

Served senior management as the Senior Science Policy Advisor with the U.S. Environmental Protection Agency, Region 9.

Activities included the following:

- Advised the Regional Administrator and senior management on emerging issues such as the potential for the gasoline additive MTBE and ammonium perchlorate to contaminate drinking water supplies.
- Shaped EPA's national response to these threats by serving on workgroups and by contributing to guidance, including the Office of Research and Development publication, *Oxygenates in Water: Critical Information and Research Needs*.
- Improved the technical training of EPA's scientific and engineering staff.
- Earned an EPA Bronze Medal for representing the region's 300 scientists and engineers in negotiations with the Administrator and senior management to better integrate scientific

principles into the policy-making process.

- Established national protocol for the peer review of scientific documents.

Geology:

With the U.S. Forest Service, Matt led investigations to determine hillslope stability of areas proposed for timber harvest in the central Oregon Coast Range. Specific activities were as follows:

- Mapped geology in the field, and used aerial photographic interpretation and mathematical models to determine slope stability.
- Coordinated his research with community members who were concerned with natural resource protection.
- Characterized the geology of an aquifer that serves as the sole source of drinking water for the city of Medford, Oregon.

As a consultant with Dames and Moore, Matt led geologic investigations of two contaminated sites (later listed on the Superfund NPL) in the Portland, Oregon, area and a large hazardous waste site in eastern Oregon. Duties included the following:

- Supervised year-long effort for soil and groundwater sampling.
- Conducted aquifer tests.
- Investigated active faults beneath sites proposed for hazardous waste disposal.

Teaching:

From 1990 to 1998, Matt taught at least one course per semester at the community college and university levels:

- At San Francisco State University, held an adjunct faculty position and taught courses in environmental geology, oceanography (lab and lecture), hydrogeology, and groundwater contamination.
- Served as a committee member for graduate and undergraduate students.
- Taught courses in environmental geology and oceanography at the College of Marin.

Matt is currently a part time geology instructor at Golden West College in Huntington Beach, California where he taught from 2010 to 2014 and in 2017.

Invited Testimony, Reports, Papers and Presentations:

Hagemann, M.F., 2008. Disclosure of Hazardous Waste Issues under CEQA. Presentation to the Public Environmental Law Conference, Eugene, Oregon.

Hagemann, M.F., 2008. Disclosure of Hazardous Waste Issues under CEQA. Invited presentation to U.S. EPA Region 9, San Francisco, California.

Hagemann, M.F., 2005. Use of Electronic Databases in Environmental Regulation, Policy Making and Public Participation. Brownfields 2005, Denver, Colorado.

Hagemann, M.F., 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Nevada and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Las Vegas, NV (served on conference organizing committee).

Hagemann, M.F., 2004. Invited testimony to a California Senate committee hearing on air toxins at schools in Southern California, Los Angeles.

Brown, A., Farrow, J., Gray, A. and **Hagemann, M.**, 2004. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to the Ground Water and Environmental Law Conference, National Groundwater Association.

Hagemann, M.F., 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Arizona and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Phoenix, AZ (served on conference organizing committee).

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in the Southwestern U.S. Invited presentation to a special committee meeting of the National Academy of Sciences, Irvine, CA.

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a tribal EPA meeting, Pechanga, CA.

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a meeting of tribal representatives, Parker, AZ.

Hagemann, M.F., 2003. Impact of Perchlorate on the Colorado River and Associated Drinking Water Supplies. Invited presentation to the Inter-Tribal Meeting, Torres Martinez Tribe.

Hagemann, M.F., 2003. The Emergence of Perchlorate as a Widespread Drinking Water Contaminant. Invited presentation to the U.S. EPA Region 9.

Hagemann, M.F., 2003. A Deductive Approach to the Assessment of Perchlorate Contamination. Invited presentation to the California Assembly Natural Resources Committee.

Hagemann, M.F., 2003. Perchlorate: A Cold War Legacy in Drinking Water. Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. From Tank to Tap: A Chronology of MTBE in Groundwater. Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. A Chronology of MTBE in Groundwater and an Estimate of Costs to Address Impacts to Groundwater. Presentation to the annual meeting of the Society of Environmental Journalists.

Hagemann, M.F., 2002. An Estimate of the Cost to Address MTBE Contamination in Groundwater (and Who Will Pay). Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to a meeting of the U.S. EPA and State Underground Storage Tank Program managers.

Hagemann, M.F., 2001. From Tank to Tap: A Chronology of MTBE in Groundwater. Unpublished report.

Hagemann, M.F., 2001. Estimated Cleanup Cost for MTBE in Groundwater Used as Drinking Water. Unpublished report.

Hagemann, M.F., 2001. Estimated Costs to Address MTBE Releases from Leaking Underground Storage Tanks. Unpublished report.

Hagemann, M.F., and VanMouwerik, M., 1999. Potential Water Quality Concerns Related to Snowmobile Usage. Water Resources Division, National Park Service, Technical Report.

VanMouwerik, M. and **Hagemann, M.F.** 1999, Water Quality Concerns Related to Personal Watercraft Usage. Water Resources Division, National Park Service, Technical Report.

Hagemann, M.F., 1999, Is Dilution the Solution to Pollution in National Parks? The George Wright Society Biannual Meeting, Asheville, North Carolina.

Hagemann, M.F., 1997, The Potential for MTBE to Contaminate Groundwater. U.S. EPA Superfund Groundwater Technical Forum Annual Meeting, Las Vegas, Nevada.

Hagemann, M.F., and Gill, M., 1996, Impediments to Intrinsic Remediation, Moffett Field Naval Air Station, Conference on Intrinsic Remediation of Chlorinated Hydrocarbons, Salt Lake City.

Hagemann, M.F., Fukunaga, G.L., 1996, The Vulnerability of Groundwater to Anthropogenic Contaminants on the Island of Maui, Hawaii. Hawaii Water Works Association Annual Meeting, Maui, October 1996.

Hagemann, M. F., Fukunaga, G. L., 1996, Ranking Groundwater Vulnerability in Central Oahu, Hawaii. Proceedings, Geographic Information Systems in Environmental Resources Management, Air and Waste Management Association Publication VIP-61.

Hagemann, M.F., 1994. Groundwater Characterization and Clean up at Closing Military Bases in California. Proceedings, California Groundwater Resources Association Meeting.

Hagemann, M.F. and Sabol, M.A., 1993. Role of the U.S. EPA in the High Plains States Groundwater Recharge Demonstration Program. Proceedings, Sixth Biennial Symposium on the Artificial Recharge of Groundwater.

Hagemann, M.F., 1993. U.S. EPA Policy on the Technical Impracticability of the Cleanup of DNAPL-contaminated Groundwater. California Groundwater Resources Association Meeting.

Hagemann, M.F., 1992. Dense Nonaqueous Phase Liquid Contamination of Groundwater: An Ounce of Prevention... Proceedings, Association of Engineering Geologists Annual Meeting, v. 35.

Other Experience:

Selected as subject matter expert for the California Professional Geologist licensing examinations, 2009-2011.



Technical Consultation, Data Analysis and
Litigation Support for the Environment

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Paul Rosenfeld, Ph.D.

Principal Environmental Chemist

Chemical Fate and Transport & Air Dispersion Modeling

Risk Assessment & Remediation Specialist

Education

Ph.D. Soil Chemistry, University of Washington, 1999. Dissertation on volatile organic compound filtration.

M.S. Environmental Science, U.C. Berkeley, 1995. Thesis on organic waste economics.

B.A. Environmental Studies, U.C. Santa Barbara, 1991. Thesis on wastewater treatment.

Professional Experience

Dr. Rosenfeld has over 25 years' experience conducting environmental investigations and risk assessments for evaluating impacts to human health, property, and ecological receptors. His expertise focuses on the fate and transport of environmental contaminants, human health risk, exposure assessment, and ecological restoration. Dr. Rosenfeld has evaluated and modeled emissions from oil spills, landfills, boilers and incinerators, process stacks, storage tanks, confined animal feeding operations, industrial, military and agricultural sources, unconventional oil drilling operations, and locomotive and construction engines. His project experience ranges from monitoring and modeling of pollution sources to evaluating impacts of pollution on workers at industrial facilities and residents in surrounding communities. Dr. Rosenfeld has also successfully modeled exposure to contaminants distributed by water systems and via vapor intrusion.

Dr. Rosenfeld has investigated and designed remediation programs and risk assessments for contaminated sites containing lead, heavy metals, mold, bacteria, particulate matter, petroleum hydrocarbons, chlorinated solvents, pesticides, radioactive waste, dioxins and furans, semi- and volatile organic compounds, PCBs, PAHs, creosote, perchlorate, asbestos, per- and poly-fluoroalkyl substances (PFOA/PFOS), unusual polymers, fuel oxygenates (MTBE), among other pollutants. Dr. Rosenfeld also has experience evaluating greenhouse gas emissions from various projects and is an expert on the assessment of odors from industrial and agricultural sites, as well as the evaluation of odor nuisance impacts and technologies for abatement of odorous emissions. As a principal scientist at SWAPE, Dr. Rosenfeld directs air dispersion modeling and exposure assessments. He has served as an expert witness and testified about pollution sources causing nuisance and/or personal injury at sites and has testified as an expert witness on numerous cases involving exposure to soil, water and air contaminants from industrial, railroad, agricultural, and military sources.

Professional History:

Soil Water Air Protection Enterprise (SWAPE); 2003 to present; Principal and Founding Partner
UCLA School of Public Health; 2007 to 2011; Lecturer (Assistant Researcher)
UCLA School of Public Health; 2003 to 2006; Adjunct Professor
UCLA Environmental Science and Engineering Program; 2002-2004; Doctoral Intern Coordinator
UCLA Institute of the Environment, 2001-2002; Research Associate
Komex H₂O Science, 2001 to 2003; Senior Remediation Scientist
National Groundwater Association, 2002-2004; Lecturer
San Diego State University, 1999-2001; Adjunct Professor
Anteon Corp., San Diego, 2000-2001; Remediation Project Manager
Ogden (now Amec), San Diego, 2000-2000; Remediation Project Manager
Bechtel, San Diego, California, 1999 – 2000; Risk Assessor
King County, Seattle, 1996 – 1999; Scientist
James River Corp., Washington, 1995-96; Scientist
Big Creek Lumber, Davenport, California, 1995; Scientist
Plumas Corp., California and USFS, Tahoe 1993-1995; Scientist
Peace Corps and World Wildlife Fund, St. Kitts, West Indies, 1991-1993; Scientist

Publications:

Remy, L.L., Clay T., Byers, V., **Rosenfeld P. E.** (2019) Hospital, Health, and Community Burden After Oil Refinery Fires, Richmond, California 2007 and 2012. *Environmental Health*. 18:48

Simons, R.A., Seo, Y. **Rosenfeld, P.**, (2015) Modeling the Effect of Refinery Emission On Residential Property Value. *Journal of Real Estate Research*. 27(3):321-342

Chen, J. A, Zapata A. R., Sutherland A. J., Molmen, D.R., Chow, B. S., Wu, L. E., **Rosenfeld, P. E.**, Hesse, R. C., (2012) Sulfur Dioxide and Volatile Organic Compound Exposure To A Community In Texas City Texas Evaluated Using Aermოდ and Empirical Data. *American Journal of Environmental Science*, 8(6), 622-632.

Rosenfeld, P.E. & Feng, L. (2011). *The Risks of Hazardous Waste*. Amsterdam: Elsevier Publishing.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2011). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Agrochemical Industry*, Amsterdam: Elsevier Publishing.

Gonzalez, J., Feng, L., Sutherland, A., Waller, C., Sok, H., Hesse, R., **Rosenfeld, P.** (2010). PCBs and Dioxins/Furans in Attic Dust Collected Near Former PCB Production and Secondary Copper Facilities in Sauget, IL. *Procedia Environmental Sciences*. 113–125.

Feng, L., Wu, C., Tam, L., Sutherland, A.J., Clark, J.J., **Rosenfeld, P.E.** (2010). Dioxin and Furan Blood Lipid and Attic Dust Concentrations in Populations Living Near Four Wood Treatment Facilities in the United States. *Journal of Environmental Health*. 73(6), 34-46.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2010). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Wood and Paper Industries*. Amsterdam: Elsevier Publishing.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2009). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Petroleum Industry*. Amsterdam: Elsevier Publishing.

Wu, C., Tam, L., Clark, J., **Rosenfeld, P.** (2009). Dioxin and furan blood lipid concentrations in populations living near four wood treatment facilities in the United States. *WIT Transactions on Ecology and the Environment, Air Pollution*, 123 (17), 319-327.

Tam L. K., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008). A Statistical Analysis Of Attic Dust And Blood Lipid Concentrations Of Tetrachloro-p-Dibenzodioxin (TCDD) Toxicity Equivalency Quotients (TEQ) In Two Populations Near Wood Treatment Facilities. *Organohalogen Compounds*, 70, 002252-002255.

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Hensley, A.R. A. Scott, J. J. J. Clark, **Rosenfeld, P.E.** (2007). Attic Dust and Human Blood Samples Collected near a Former Wood Treatment Facility. *Environmental Research*. 105, 194-197.

Rosenfeld, P.E., J. J. J. Clark, A. R. Hensley, M. Suffet. (2007). The Use of an Odor Wheel Classification for Evaluation of Human Health Risk Criteria for Compost Facilities. *Water Science & Technology* 55(5), 345-357.

Rosenfeld, P. E., M. Suffet. (2007). The Anatomy Of Odour Wheels For Odours Of Drinking Water, Wastewater, Compost And The Urban Environment. *Water Science & Technology* 55(5), 335-344.

Sullivan, P. J. Clark, J.J.J., Agardy, F. J., **Rosenfeld, P.E.** (2007). *Toxic Legacy, Synthetic Toxins in the Food, Water, and Air in American Cities*. Boston Massachusetts: Elsevier Publishing

Rosenfeld, P.E., and Suffet I.H. (2004). Control of Compost Odor Using High Carbon Wood Ash. *Water Science and Technology*. 49(9),171-178.

Rosenfeld P. E., J.J. Clark, I.H. (Mel) Suffet (2004). The Value of An Odor-Quality-Wheel Classification Scheme For The Urban Environment. *Water Environment Federation's Technical Exhibition and Conference (WEFTEC) 2004*. New Orleans, October 2-6, 2004.

Rosenfeld, P.E., and Suffet, I.H. (2004). Understanding Odorants Associated With Compost, Biomass Facilities, and the Land Application of Biosolids. *Water Science and Technology*. 49(9), 193-199.

Rosenfeld, P.E., and Suffet I.H. (2004). Control of Compost Odor Using High Carbon Wood Ash, *Water Science and Technology*, 49(9), 171-178.

Rosenfeld, P. E., Grey, M. A., Sellev, P. (2004). Measurement of Biosolids Odor and Odorant Emissions from Windrows, Static Pile and Biofilter. *Water Environment Research*. 76(4), 310-315.

Rosenfeld, P.E., Grey, M and Suffet, M. (2002). Compost Demonstration Project, Sacramento California Using High-Carbon Wood Ash to Control Odor at a Green Materials Composting Facility. *Integrated Waste Management Board Public Affairs Office, Publications Clearinghouse (MS-6)*, Sacramento, CA Publication #442-02-008.

Rosenfeld, P.E., and C.L. Henry. (2001). Characterization of odor emissions from three different biosolids. *Water Soil and Air Pollution*. 127(1-4), 173-191.

Rosenfeld, P.E., and Henry C. L., (2000). Wood ash control of odor emissions from biosolids application. *Journal of Environmental Quality*. 29, 1662-1668.

Rosenfeld, P.E., C.L. Henry and D. Bennett. (2001). Wastewater dewatering polymer affect on biosolids odor emissions and microbial activity. *Water Environment Research*. 73(4), 363-367.

Rosenfeld, P.E., and C.L. Henry. (2001). Activated Carbon and Wood Ash Sorption of Wastewater, Compost, and Biosolids Odorants. *Water Environment Research*, 73, 388-393.

Rosenfeld, P.E., and Henry C. L., (2001). High carbon wood ash effect on biosolids microbial activity and odor. *Water Environment Research*. 131(1-4), 247-262.

Chollack, T. and **P. Rosenfeld**. (1998). Compost Amendment Handbook For Landscaping. Prepared for and distributed by the City of Redmond, Washington State.

Rosenfeld, P. E. (1992). The Mount Liamuiga Crater Trail. *Heritage Magazine of St. Kitts*, 3(2).

Rosenfeld, P. E. (1993). High School Biogas Project to Prevent Deforestation On St. Kitts. *Biomass Users Network*, 7(1).

Rosenfeld, P. E. (1998). Characterization, Quantification, and Control of Odor Emissions From Biosolids Application To Forest Soil. Doctoral Thesis. University of Washington College of Forest Resources.

Rosenfeld, P. E. (1994). Potential Utilization of Small Diameter Trees on Sierra County Public Land. Masters thesis reprinted by the Sierra County Economic Council. Sierra County, California.

Rosenfeld, P. E. (1991). How to Build a Small Rural Anaerobic Digester & Uses Of Biogas In The First And Third World. Bachelors Thesis. University of California.

Presentations:

Rosenfeld, P.E., "The science for Perfluorinated Chemicals (PFAS): What makes remediation so hard?" Law Seminars International, (May 9-10, 2018) 800 Fifth Avenue, Suite 101 Seattle, WA.

Rosenfeld, P.E., Sutherland, A; Hesse, R.; Zapata, A. (October 3-6, 2013). Air dispersion modeling of volatile organic emissions from multiple natural gas wells in Decatur, TX. *44th Western Regional Meeting, American Chemical Society*. Lecture conducted from Santa Clara, CA.

Sok, H.L.; Waller, C.C.; Feng, L.; Gonzalez, J.; Sutherland, A.J.; Wisdom-Stack, T.; Sahai, R.K.; Hesse, R.C.; **Rosenfeld, P.E.** (June 20-23, 2010). Atrazine: A Persistent Pesticide in Urban Drinking Water. *Urban Environmental Pollution*. Lecture conducted from Boston, MA.

Feng, L.; Gonzalez, J.; Sok, H.L.; Sutherland, A.J.; Waller, C.C.; Wisdom-Stack, T.; Sahai, R.K.; La, M.; Hesse, R.C.; **Rosenfeld, P.E.** (June 20-23, 2010). Bringing Environmental Justice to East St. Louis, Illinois. *Urban Environmental Pollution*. Lecture conducted from Boston, MA.

Rosenfeld, P.E. (April 19-23, 2009). Perfluorooctanoic Acid (PFOA) and Perfluoroactane Sulfonate (PFOS) Contamination in Drinking Water From the Use of Aqueous Film Forming Foams (AFFF) at Airports in the United States. *2009 Ground Water Summit and 2009 Ground Water Protection Council Spring Meeting*, Lecture conducted from Tuscon, AZ.

Rosenfeld, P.E. (April 19-23, 2009). Cost to Filter Atrazine Contamination from Drinking Water in the United States" Contamination in Drinking Water From the Use of Aqueous Film Forming Foams (AFFF) at Airports in the United States. *2009 Ground Water Summit and 2009 Ground Water Protection Council Spring Meeting*. Lecture conducted from Tuscon, AZ.

Wu, C., Tam, L., Clark, J., **Rosenfeld, P.** (20-22 July, 2009). Dioxin and furan blood lipid concentrations in populations living near four wood treatment facilities in the United States. Brebbia, C.A. and Popov, V., eds., *Air Pollution XVII: Proceedings of the Seventeenth International Conference on Modeling, Monitoring and Management of Air Pollution*. Lecture conducted from Tallinn, Estonia.

Rosenfeld, P. E. (October 15-18, 2007). Moss Point Community Exposure To Contaminants From A Releasing Facility. *The 23rd Annual International Conferences on Soils Sediment and Water*. Platform lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld, P. E. (October 15-18, 2007). The Repeated Trespass of Tritium-Contaminated Water Into A Surrounding Community Form Repeated Waste Spills From A Nuclear Power Plant. *The 23rd Annual International*

Conferences on Soils Sediment and Water. Platform lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld, P. E. (October 15-18, 2007). Somerville Community Exposure To Contaminants From Wood Treatment Facility Emissions. The 23rd *Annual International Conferences on Soils Sediment and Water*. Lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld P. E. (March 2007). Production, Chemical Properties, Toxicology, & Treatment Case Studies of 1,2,3-Trichloropropane (TCP). *The Association for Environmental Health and Sciences (AEHS) Annual Meeting*. Lecture conducted from San Diego, CA.

Rosenfeld P. E. (March 2007). Blood and Attic Sampling for Dioxin/Furan, PAH, and Metal Exposure in Florala, Alabama. *The AEHS Annual Meeting*. Lecture conducted from San Diego, CA.

Hensley A.R., Scott, A., **Rosenfeld P.E.**, Clark, J.J.J. (August 21 – 25, 2006). Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility. *The 26th International Symposium on Halogenated Persistent Organic Pollutants – DIOXIN2006*. Lecture conducted from Radisson SAS Scandinavia Hotel in Oslo Norway.

Hensley A.R., Scott, A., **Rosenfeld P.E.**, Clark, J.J.J. (November 4-8, 2006). Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility. *APHA 134 Annual Meeting & Exposition*. Lecture conducted from Boston Massachusetts.

Paul Rosenfeld Ph.D. (October 24-25, 2005). Fate, Transport and Persistence of PFOA and Related Chemicals. Mealey's C8/PFOA. *Science, Risk & Litigation Conference*. Lecture conducted from The Rittenhouse Hotel, Philadelphia, PA.

Paul Rosenfeld Ph.D. (September 19, 2005). Brominated Flame Retardants in Groundwater: Pathways to Human Ingestion, *Toxicology and Remediation PEMA Emerging Contaminant Conference*. Lecture conducted from Hilton Hotel, Irvine California.

Paul Rosenfeld Ph.D. (September 19, 2005). Fate, Transport, Toxicity, And Persistence of 1,2,3-TCP. *PEMA Emerging Contaminant Conference*. Lecture conducted from Hilton Hotel in Irvine, California.

Paul Rosenfeld Ph.D. (September 26-27, 2005). Fate, Transport and Persistence of PDBEs. *Mealey's Groundwater Conference*. Lecture conducted from Ritz Carlton Hotel, Marina Del Ray, California.

Paul Rosenfeld Ph.D. (June 7-8, 2005). Fate, Transport and Persistence of PFOA and Related Chemicals. *International Society of Environmental Forensics: Focus On Emerging Contaminants*. Lecture conducted from Sheraton Oceanfront Hotel, Virginia Beach, Virginia.

Paul Rosenfeld Ph.D. (July 21-22, 2005). Fate Transport, Persistence and Toxicology of PFOA and Related Perfluorochemicals. *2005 National Groundwater Association Ground Water And Environmental Law Conference*. Lecture conducted from Wyndham Baltimore Inner Harbor, Baltimore Maryland.

Paul Rosenfeld Ph.D. (July 21-22, 2005). Brominated Flame Retardants in Groundwater: Pathways to Human Ingestion, Toxicology and Remediation. *2005 National Groundwater Association Ground Water and Environmental Law Conference*. Lecture conducted from Wyndham Baltimore Inner Harbor, Baltimore Maryland.

Paul Rosenfeld, Ph.D. and James Clark Ph.D. and Rob Hesse R.G. (May 5-6, 2004). Tert-butyl Alcohol Liability and Toxicology, A National Problem and Unquantified Liability. *National Groundwater Association. Environmental Law Conference*. Lecture conducted from Congress Plaza Hotel, Chicago Illinois.

Paul Rosenfeld, Ph.D. (March 2004). Perchlorate Toxicology. *Meeting of the American Groundwater Trust*. Lecture conducted from Phoenix Arizona.

Hagemann, M.F., **Paul Rosenfeld, Ph.D.** and Rob Hesse (2004). Perchlorate Contamination of the Colorado River. *Meeting of tribal representatives*. Lecture conducted from Parker, AZ.

Paul Rosenfeld, Ph.D. (April 7, 2004). A National Damage Assessment Model For PCE and Dry Cleaners. *Drycleaner Symposium. California Ground Water Association*. Lecture conducted from Radison Hotel, Sacramento, California.

Rosenfeld, P. E., Grey, M., (June 2003) Two stage biofilter for biosolids composting odor control. *Seventh International In Situ And On Site Bioremediation Symposium Battelle Conference* Orlando, FL.

Paul Rosenfeld, Ph.D. and James Clark Ph.D. (February 20-21, 2003) Understanding Historical Use, Chemical Properties, Toxicity and Regulatory Guidance of 1,4 Dioxane. *National Groundwater Association. Southwest Focus Conference. Water Supply and Emerging Contaminants..* Lecture conducted from Hyatt Regency Phoenix Arizona.

Paul Rosenfeld, Ph.D. (February 6-7, 2003). Underground Storage Tank Litigation and Remediation. *California CUPA Forum*. Lecture conducted from Marriott Hotel, Anaheim California.

Paul Rosenfeld, Ph.D. (October 23, 2002) Underground Storage Tank Litigation and Remediation. *EPA Underground Storage Tank Roundtable*. Lecture conducted from Sacramento California.

Rosenfeld, P.E. and Suffet, M. (October 7- 10, 2002). Understanding Odor from Compost, *Wastewater and Industrial Processes. Sixth Annual Symposium On Off Flavors in the Aquatic Environment. International Water Association*. Lecture conducted from Barcelona Spain.

Rosenfeld, P.E. and Suffet, M. (October 7- 10, 2002). Using High Carbon Wood Ash to Control Compost Odor. *Sixth Annual Symposium On Off Flavors in the Aquatic Environment. International Water Association*. Lecture conducted from Barcelona Spain.

Rosenfeld, P.E. and Grey, M. A. (September 22-24, 2002). Biocycle Composting For Coastal Sage Restoration. *Northwest Biosolids Management Association*. Lecture conducted from Vancouver Washington..

Rosenfeld, P.E. and Grey, M. A. (November 11-14, 2002). Using High-Carbon Wood Ash to Control Odor at a Green Materials Composting Facility. *Soil Science Society Annual Conference*. Lecture conducted from Indianapolis, Maryland.

Rosenfeld. P.E. (September 16, 2000). Two stage biofilter for biosolids composting odor control. *Water Environment Federation*. Lecture conducted from Anaheim California.

Rosenfeld. P.E. (October 16, 2000). Wood ash and biofilter control of compost odor. *Biofest*. Lecture conducted from Ocean Shores, California.

Rosenfeld, P.E. (2000). Bioremediation Using Organic Soil Amendments. *California Resource Recovery Association*. Lecture conducted from Sacramento California.

Rosenfeld, P.E., C.L. Henry, R. Harrison. (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation With High-Carbon Wood-Ash. *Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings*. Lecture conducted from Bellevue Washington.

Rosenfeld, P.E., and C.L. Henry. (1999). An evaluation of ash incorporation with biosolids for odor reduction. *Soil Science Society of America*. Lecture conducted from Salt Lake City Utah.

Rosenfeld, P.E., C.L. Henry, R. Harrison. (1998). Comparison of Microbial Activity and Odor Emissions from Three Different Biosolids Applied to Forest Soil. *Brown and Caldwell*. Lecture conducted from Seattle Washington.

Rosenfeld, P.E., C.L. Henry. (1998). Characterization, Quantification, and Control of Odor Emissions from Biosolids Application To Forest Soil. *Biofest*. Lecture conducted from Lake Chelan, Washington.

Rosenfeld, P.E., C.L. Henry, R. Harrison. (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation With High-Carbon Wood-Ash. Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings. Lecture conducted from Bellevue Washington.

Rosenfeld, P.E., C.L. Henry, R. B. Harrison, and R. Dills. (1997). Comparison of Odor Emissions From Three Different Biosolids Applied to Forest Soil. *Soil Science Society of America*. Lecture conducted from Anaheim California.

Teaching Experience:

UCLA Department of Environmental Health (Summer 2003 through 20010) Taught Environmental Health Science 100 to students, including undergrad, medical doctors, public health professionals and nurses. Course focused on the health effects of environmental contaminants.

National Ground Water Association, Successful Remediation Technologies. Custom Course in Sante Fe, New Mexico. May 21, 2002. Focused on fate and transport of fuel contaminants associated with underground storage tanks.

National Ground Water Association; Successful Remediation Technologies Course in Chicago Illinois. April 1, 2002. Focused on fate and transport of contaminants associated with Superfund and RCRA sites.

California Integrated Waste Management Board, April and May, 2001. Alternative Landfill Caps Seminar in San Diego, Ventura, and San Francisco. Focused on both prescriptive and innovative landfill cover design.

UCLA Department of Environmental Engineering, February 5, 2002. Seminar on Successful Remediation Technologies focusing on Groundwater Remediation.

University Of Washington, Soil Science Program, Teaching Assistant for several courses including: Soil Chemistry, Organic Soil Amendments, and Soil Stability.

U.C. Berkeley, Environmental Science Program Teaching Assistant for Environmental Science 10.

Academic Grants Awarded:

California Integrated Waste Management Board. \$41,000 grant awarded to UCLA Institute of the Environment. Goal: To investigate effect of high carbon wood ash on volatile organic emissions from compost. 2001.

Synagro Technologies, Corona California: \$10,000 grant awarded to San Diego State University. Goal: investigate effect of biosolids for restoration and remediation of degraded coastal sage soils. 2000.

King County, Department of Research and Technology, Washington State. \$100,000 grant awarded to University of Washington: Goal: To investigate odor emissions from biosolids application and the effect of polymers and ash on VOC emissions. 1998.

Northwest Biosolids Management Association, Washington State. \$20,000 grant awarded to investigate effect of polymers and ash on VOC emissions from biosolids. 1997.

James River Corporation, Oregon: \$10,000 grant was awarded to investigate the success of genetically engineered Poplar trees with resistance to round-up. 1996.

United State Forest Service, Tahoe National Forest: \$15,000 grant was awarded to investigating fire ecology of the Tahoe National Forest. 1995.

Kellogg Foundation, Washington D.C. \$500 grant was awarded to construct a large anaerobic digester on St. Kitts in West Indies. 1993

Deposition and/or Trial Testimony:

In the Circuit Court Of The Twentieth Judicial Circuit, St Clair County, Illinois
Martha Custer et al., Plaintiff vs. Cerro Flow Products, Inc., Defendants
Case No.: No. 0i9-L-2295
Rosenfeld Deposition, 5-14-2021
Trial, October 8-4-2021

In the Circuit Court of Cook County Illinois
Joseph Rafferty, Plaintiff vs. Consolidated Rail Corporation and National Railroad Passenger Corporation
d/b/a AMTRAK,
Case No.: No. 18-L-6845
Rosenfeld Deposition, 6-28-2021

In the United States District Court For the Northern District of Illinois
Theresa Romcoe, Plaintiff vs. Northeast Illinois Regional Commuter Railroad Corporation d/b/a METRA
Rail, Defendants
Case No.: No. 17-cv-8517
Rosenfeld Deposition, 5-25-2021

In the Superior Court of the State of Arizona In and For the Cunty of Maricopa
Mary Tryon et al., Plaintiff vs. The City of Pheonix v. Cox Cactus Farm, L.L.C., Utah Shelter Systems, Inc.
Case Number CV20127-094749
Rosenfeld Deposition: 5-7-2021

In the United States District Court for the Eastern District of Texas Beaumont Division
Robinson, Jeremy et al *Plaintiffs*, vs. CNA Insurance Company et al.
Case Number 1:17-cv-000508
Rosenfeld Deposition: 3-25-2021

In the Superior Court of the State of California, County of San Bernardino
Gary Garner, Personal Representative for the Estate of Melvin Garner vs. BNSF Railway Company.
Case No. 1720288
Rosenfeld Deposition 2-23-2021

In the Superior Court of the State of California, County of Los Angeles, Spring Street Courthouse
Benny M Rodriguez vs. Union Pacific Railroad, A Corporation, et al.
Case No. 18STCV01162
Rosenfeld Deposition 12-23-2020

In the Circuit Court of Jackson County, Missouri
Karen Cornwell, *Plaintiff*, vs. Marathon Petroleum, LP, *Defendant*.
Case No.: 1716-CV10006
Rosenfeld Deposition. 8-30-2019

In the United States District Court For The District of New Jersey
Duarte et al, *Plaintiffs*, vs. United States Metals Refining Company et. al. *Defendant*.
Case No.: 2:17-cv-01624-ES-SCM
Rosenfeld Deposition. 6-7-2019

In the United States District Court of Southern District of Texas Galveston Division
M/T Carla Maersk, *Plaintiffs*, vs. Conti 168., Schiffahrts-GMBH & Co. Bulker KG MS “Conti Perdido”
Defendant.
Case No.: 3:15-CV-00106 consolidated with 3:15-CV-00237
Rosenfeld Deposition. 5-9-2019

In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica
Carole-Taddeo-Bates et al., vs. Ifran Khan et al., Defendants
Case No.: No. BC615636
Rosenfeld Deposition, 1-26-2019

In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica
The San Gabriel Valley Council of Governments et al. vs El Adobe Apts. Inc. et al., Defendants
Case No.: No. BC646857
Rosenfeld Deposition, 10-6-2018; Trial 3-7-19

In United States District Court For The District of Colorado
Bells et al. Plaintiff vs. The 3M Company et al., Defendants
Case No.: 1:16-cv-02531-RBJ
Rosenfeld Deposition, 3-15-2018 and 4-3-2018

In The District Court Of Regan County, Texas, 112th Judicial District
Phillip Bales et al., Plaintiff vs. Dow Agrosciences, LLC, et al., Defendants
Cause No.: 1923
Rosenfeld Deposition, 11-17-2017

In The Superior Court of the State of California In And For The County Of Contra Costa
Simons et al., Plaintiffs vs. Chevron Corporation, et al., Defendants
Cause No C12-01481
Rosenfeld Deposition, 11-20-2017

In The Circuit Court Of The Twentieth Judicial Circuit, St Clair County, Illinois
Martha Custer et al., Plaintiff vs. Cerro Flow Products, Inc., Defendants
Case No.: No. 019-L-2295
Rosenfeld Deposition, 8-23-2017

In United States District Court For The Southern District of Mississippi
Guy Manuel vs. The BP Exploration et al., Defendants
Case: No 1:19-cv-00315-RHW
Rosenfeld Deposition, 4-22-2020

In The Superior Court of the State of California, For The County of Los Angeles
Warrn Gilbert and Penny Gilbert, Plaintiff vs. BMW of North America LLC
Case No.: LC102019 (c/w BC582154)
Rosenfeld Deposition, 8-16-2017, Trail 8-28-2018

In the Northern District Court of Mississippi, Greenville Division
Brenda J. Cooper, et al., *Plaintiffs*, vs. Meritor Inc., et al., *Defendants*
Case Number: 4:16-cv-52-DMB-JVM
Rosenfeld Deposition: July 2017

In The Superior Court of the State of Washington, County of Snohomish
Michael Davis and Julie Davis et al., Plaintiff vs. Cedar Grove Composting Inc., Defendants
Case No.: No. 13-2-03987-5
Rosenfeld Deposition, February 2017
Trial, March 2017

In The Superior Court of the State of California, County of Alameda
Charles Spain., Plaintiff vs. Thermo Fisher Scientific, et al., Defendants
Case No.: RG14711115
Rosenfeld Deposition, September 2015

In The Iowa District Court In And For Poweshiek County
Russell D. Winburn, et al., Plaintiffs vs. Doug Hoksbergen, et al., Defendants
Case No.: LALA002187
Rosenfeld Deposition, August 2015

In The Circuit Court of Ohio County, West Virginia
Robert Andrews, et al. v. Antero, et al.
Civil Action NO. 14-C-30000
Rosenfeld Deposition, June 2015

In The Iowa District Court For Muscatine County
Laurie Freeman et. al. Plaintiffs vs. Grain Processing Corporation, Defendant
Case No 4980
Rosenfeld Deposition: May 2015

In the Circuit Court of the 17th Judicial Circuit, in and For Broward County, Florida
Walter Hinton, et. al. Plaintiff, vs. City of Fort Lauderdale, Florida, a Municipality, Defendant.
Case Number CACE07030358 (26)
Rosenfeld Deposition: December 2014

In the County Court of Dallas County Texas
Lisa Parr et al, *Plaintiff*, vs. Aruba et al, *Defendant*.
Case Number cc-11-01650-E
Rosenfeld Deposition: March and September 2013
Rosenfeld Trial: April 2014

In the Court of Common Pleas of Tuscarawas County Ohio
John Michael Abicht, et al., *Plaintiffs*, vs. Republic Services, Inc., et al., *Defendants*
Case Number: 2008 CT 10 0741 (Cons. w/ 2009 CV 10 0987)
Rosenfeld Deposition: October 2012

In the United States District Court for the Middle District of Alabama, Northern Division
James K. Benefield, et al., *Plaintiffs*, vs. International Paper Company, *Defendant*.
Civil Action Number 2:09-cv-232-WHA-TFM
Rosenfeld Deposition: July 2010, June 2011

In the Circuit Court of Jefferson County Alabama
Jaeonette Moss Anthony, et al., *Plaintiffs*, vs. Drummond Company Inc., et al., *Defendants*
Civil Action No. CV 2008-2076
Rosenfeld Deposition: September 2010

In the United States District Court, Western District Lafayette Division
Ackle et al., *Plaintiffs*, vs. Citgo Petroleum Corporation, et al., *Defendants*.
Case Number 2:07CV1052
Rosenfeld Deposition: July 2009

EXHIBIT C



WI #22-004.20

September 21, 2022

Richard Drury, Esquire
Lozeau | Drury LLP
1939 Harrison Street, Suite 150
Oakland, California 94612

SUBJECT: TENTEN Hollywood Project Categorical Exemption, Comments on the Noise Analysis

Dear Mr. Drury,

Per your request, I have reviewed the subject matter document for the TENTEN Hollywood Project Categorical Exemption (CatEx) in Los Angeles, California. The proposed Project would add two residential buildings (one 5-story and the other 6-story) to a site with an existing 2-story commercial structure. The Noise Impact Analysis is contained in Section 2.0 of the CatEx, with supplemental calculations in Attachment 4.

The Project is surrounded by noise sensitive uses – residences to the north on Lexington Avenue (ID 3 in Attachment 4), to the west facing Lodi Place (ID 1), and to the east on N. Gower Street (ID 5).

Baseline Noise Level characterizations are Incomplete

In order to conduct the CEQA analysis, the baseline must be established for evening, and possibly nighttime conditions. Social events in the roof deck terrace with pool and lounge spaces could occur during evening hours, and rooftop equipment could also operate during evening and nighttime conditions. Without this data, it is not possible to evaluate the significance of noise sources operating during non-daytime hours.

Furthermore, the noise analysis relies on short-term measurements of 15-minute duration taken in the middle of the day (approximately 2 to 3 PM) without any discussion of how typical these data were for daytime conditions or how they would apply to evening or nighttime conditions. Environmental noise can vary widely throughout the day (perhaps +/-10 dBA or more for areas with intermittent local traffic), and relying on measurements that represent only 2% of the daytime hours (7 AM to 7 PM) leaves quite a lot for interpretation

Thresholds of Significance are Not Properly Developed

Per CEQA¹, the CE can only be applied to projects which have no significant effects:

14 CCR § 15300

§ 15300. Categorical Exemptions.

Section 21084 of the Public Resources Code requires these guidelines to include a list of classes of projects which have been determined not to have a significant effect on the environment and which shall, therefore, be exempt from the provisions of CEQA. In response to that mandate, the Secretary for Resources has found that the following classes of projects listed in this article do not have a significant effect on the environment, and they are declared to be categorically exempt from the requirement for the preparation of environmental documents.

Note: Authority cited: Section 21083, Public Resources Code. Reference: Section 21084, Public Resources Code.

Figure 1 CEQA Section 15300

Thus, a project that has significant, or ***potentially significant***, effects cannot qualify for a categorical exemption. Any nighttime activities should also be evaluated for potential sleep disturbance which could be caused by social events at the rooftop terrace areas, and including, but not limited to, rooftop mechanical equipment and amplified music. Sleep disturbance being noises which may not cause a person to become fully awake, but instead change a person's sleep from one deeper level of sleep to a less restful level of sleep. Although the health effects of noise are not taken as seriously in the United States as they are in other countries, they are real and, in many parts of the country, pervasive. Noise can disturb sleep by making it more difficult to fall asleep, by waking someone after they are asleep, or by altering their sleep stage, e.g., reducing the amount of rapid eye movement (REM) sleep. Noise exposure for people who are sleeping has also been linked to increased blood pressure, increased heart rate, increase in body movements, and other physiological effects. Not surprisingly, people whose sleep is disturbed by noise often experience secondary effects such as increased fatigue, depressed mood, and decreased work performance.

The document cites no objective criterion to evaluate rooftop noise, and it uses a 5 dBA increase over the daytime ambient. There are several flaws with this approach, including a) potentially the most intrusive hours of operating from the rooftop deck would be the evening (e.g., 7 to 10 PM) and nighttime (10 PM to 7 AM) for which no baseline data was collected, b) no criteria to evaluate potential sleep disturbance have been presented, and a noise increase threshold, for the Project and the cumulative evaluations compounds one project on top of another and would potentially lead to a substantial and significant noise impact.

Impact Analyses are Incomplete

Rooftop Deck/Terrace

Similarly, the noise analysis from the rooftop deck/terrace must be reconsidered. Based on the Project site plan (CatEx, Figure 17) there would be **no** buildings providing any substantial shielding of this area for nearby residents to the west. Noise from the active areas along to the east side could be unshielded by parapet walls to the residences along N. Gower. Excluding the effect of background music and shielding, 50 voices in "normal" conversation would generate 72 dBA at a distance of 90 ft and no shielding. With just 5 dBA provided by the parapet to shield the neighbor's residences from the rooftop activities, this would reduce to a range of 67 dBA. With raised voices that might occur during a party, with the 5 dBA-parapet shielding would result in a higher level of 73 dBA.

¹ <https://govt.westlaw.com/calregs/Document/IA1DEFD80D48811DEBC02831C6D6C108E?>

These noise levels would be much more than 5 dBA higher than the daytime noise levels shown in Table 2.4 (page 55), and in the absence of ambient data during evening (or nighttime) conditions, these could also be much more than 5 dBA higher than the existing evening (or nighttime) ambient. The potentially significant effects from music or other amplified sounds must also be evaluated. Thus, noise from the rooftop deck/terrace would be potentially significant based on information provided.

Rooftop Equipment

The CatEx cites an expectation that the project HVAC equipment would be similar to what is on site, since the existing site is a two-story commercial building and surface parking lot this is not a fair comparison. The existing equipment are very different in size and character from what would be required for two residential structures. For instance the Project equipment would operate during the nighttime hours, whereas HVAC for commercial office buildings can be shutdown at night.

In our experience there would be several mechanical units on the rooftop. Such equipment could include air cooled condenser fans with a typical sound rating of 85 sound power level (PWL), and several make up air fans as large as 40,000 cubic feet per minute (CFM) (90 dBA PWL). A combination of two or more fans would generate a noise level on the order of 51 dBA to a distance of 100 ft. In the absence of ambient data during evening (or nighttime) conditions, these could also be much more than 5 dBA higher than the existing evening (or nighttime) ambient. Noise from rooftop equipment would be potentially significant and should be evaluated with more specific information.

Noise Mitigations are Lacking

The project does not meet the requirements of a Categorical Exemption, as it requires mitigations to control noise from construction, and there are potentially significant impacts from the roof deck terrace and rooftop equipment that may require mitigation.

The calculations in Attachment 4 are presented with and without the barriers, which supports the conclusion that the barriers are “mitigation”. There seems to be a fundamental misunderstanding about the noise reduction properties of the Echo Barrier product proposed in the document. There appears to be a claim that an 8 ft tall barrier would be sufficient to provide 20 dB of attenuation. Based on the geometry an 8 ft high barrier could be expected to provide 4 to 11 dBA reduction for construction equipment for residences 50 to 90 ft away from the barrier. A 20 ft height barrier would be required to reduce construction noise by 15 to 20 dBA for ground-level construction sources. As the project rises above the ground, construction activities would not be shielded by a ground-level barrier.

Mitigations for the roof deck terrace could include limits on the type of gatherings, time of day, and size of events. Limits on amplified music should also be included as mitigation. It may be necessary to evaluate whether it is necessary to re-configure the rooftop deck areas to reduce the significance of noise emanating from those areas into the nearby residential areas. Mitigations for the rooftop equipment could include a noise study that demonstrates how the final design of the project will comply with noise ordinance and significance criteria.

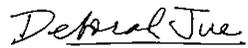
Conclusions

There are several errors and omissions in the CatEx noise analysis. Correcting these would potentially identify several significant impacts which require mitigation.

Please feel free to contact me with any questions on this information.

Very truly yours,

WILSON IHRIG



Deborah A. Jue, INCE-USA
Principal

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