

9.3 NON-AGENCY ORGANIZATION COMMENT LETTERS AND RESPONSES

The following non-agency organizations have submitted comments on the Draft EIR.

Table 9.3-1. Non-Agency Organization Comments

Respondent	Code	Contact Information	Page
California Wildlife Foundation / California Oaks Coalition Letter dated: 07/27/2022	CWF/CO	201 University Avenue, H-43 Berkeley, CA 94710 <i>Contact: Janet Cobb, Executive Officer, CWF Angela Moskow, Manager, CO</i>	9.3-3
League of Women Voters of San Luis Obispo County Letter dated: 07/27/2022	LWV	4111 Broad Street San Luis Obispo, CA 93401 <i>Contact: Cindy-Marie Absey, President; Neil Havlik, Co-Chair, Natural Resources Committee; and Kim Murry, Co-Chair, Natural Resources Committee</i>	9.3-14
Nipomo Recreation Association Letter dated: 07/29/2022	NRA	261 W Dana Street Nipomo, CA 93444 <i>Contact: Jeff Long, CEO/Executive Director</i>	9.3-21
Sierra Club Santa Lucia Chapter Letter dated: 07/29/2022	SCSLC	P.O. Box 15755 San Luis Obispo, CA 93406 <i>Contact: Andrew Christie, Director</i>	9.3-23
California Native Plant Society Letter dated: 07/30/2022	CNPS	San Luis Obispo Chapter P.O. Box 784 San Luis Obispo, CA 93406 <i>Contact: Melissa Mooney, President</i>	9.3-32
Nipomo Native Garden Letter dated: 07/30/2022	NNG	999 Osage Street, #927 Nipomo, CA 93444 <i>Contact: Cynthia Jelinek, President</i>	9.3-59
Californians for Homeownership Letter dated: 08/01/2022	CFH	525 South Virgil Avenue Los Angeles, CA 90020 <i>Contact: Matthew Gelfand, Counsel</i>	9.3-64
Coalition of Labor Agriculture & Business of San Luis Obispo County Letter dated: 08/01/2022	COLAB	PO Box 13601 San Luis Obispo, CA 93406 <i>Contact: Michael Brown, Government Affairs Director</i>	9.3-67
Healthy Communities Work Group Letter dated: 08/01/2022	HCWG	2180 Johnson Avenue San Luis Obispo, CA 93401 <i>Contact: Kealoha Ghiglia, REHS, Chair</i>	9.3-94
Home Builders Association of the Central Coast Letter dated: 08/01/2022	HBA	P.O. Box 748 San Luis Obispo, CA 93406 <i>Contact: Lindy Hatcher, Executive Director</i>	9.3-97
Southwest Regional Council of Carpenters (via Mitchell M. Tsai, Attorney at Law) Letter dated: 08/01/2022	SWRCC	139 South Hudson Avenue, Suite 200 Pasadena, California 91101 <i>Contact: Mitchell M. Tsai, Attorney at Law</i>	9.3-99
Environmental Center of San Luis Obispo Letter dated: (undated)	ECOSLO	1012 Pacific Street, Suite B-1 San Luis Obispo, CA 93401 <i>Contact: Grant Helete, Community Organizer</i>	9.3-376

Dana Reserve Specific Plan Environmental Impact Report
Chapter 9 Response to Comments

Respondent	Code	Contact Information	Page
Northern Chumash Tribal Council Letter dated: (undated)	NCTC	1590 18th Street, #1831 Los Osos, CA 93402 <i>Contact: Violet Sage Walker, Chairwoman</i>	9.3-378

9.3.1 California Wildlife Foundation / California Oaks Coalition



California Wildlife Foundation/California Oaks, 201 University Avenue, H-43 Berkeley, CA 94710, (510) 763-0282

July 27, 2022

Jennifer Guetschow
Department of Planning and Building
976 Osos Street, Room 300
San Luis Obispo, CA 93408

RE: Draft Environmental Impact Report (DEIR) for the Dana Reserve Specific Plan (PLN- 1118, SUB2020-00047, LRP2020-00007, ED21-094)

Transmitted via email: jguetschow@co.slo.ca.us

Dear Ms. Guetschow:

The [California Oaks](#) program of [California Wildlife Foundation](#) works to conserve oak ecosystems because of their critical role in sequestering carbon, maintaining healthy watersheds, providing plant and wildlife habitat, and sustaining cultural values. This letter follows the July 15, 2021 comments that California Wildlife Foundation/California Oaks (CWF/CO) submitted on the Dana Reserve Specific Plan Initial Study.

CWF/CO reviewed the Draft Environmental Impact Report (DEIR), focusing our attention on the project's impacts on the site's oak communities. CWF/CO has reached the conclusion that the County of San Luis Obispo should not advance this project, which will degrade the county's biodiversity while not necessarily advancing affordable housing.¹

CWF/CO-1

The **no project alternative** should be the **preferred alternative** because of proposed removal of over 3,943 oak trees, including 96% of the site's coast live oak woodland, which supports imperiled biodiversity; inadequate mitigation, including the possibility that suitable coast live oak woodland habitat within the range of Burton Mesa chaparral mitigation habitat may not be available in the county; many inconsistencies with county habitat protection policies; the conclusion of the DEIR (BIO Impact 19) that off-site transportation improvements and/or trenching of new water and wastewater pipelines could result in additional oak tree impacts; and the conclusion of the DEIR (BIO Impact 20) that development would induce substantial unplanned population growth on the Nipomo Mesa with additional cumulative impacts.²

CWF/CO-2

¹ Page 70 of the Executive Summary of the DEIR states: *However, based on the clustered development and other site constraints, this alternative may not meet project goals for the provision of affordable market rate housing units.*

² The discussion of "over" 3,943 reflects the omission of trees smaller than 4 inches at breast height in the calculation of tree removals.



Lastly, the Greenhouse Gas (GHG) Emissions chapter (4-8) fails to analyze or propose to mitigate for the impacts of proposed tree removals.

CWF/CO-3

Environmental impacts will degrade unique and irreplaceable San Luis Obispo County oak habitat and proposed mitigation is inadequate: The project proposes to remove greater than 3,943 oaks growing in woodland, forest, and Burton Mesa chaparral and grassland habitat. A great deal of the proposed mitigation for the oak impacts is meant to be accomplished through conservation of lands on Dana Ridge, which the DEIR states is of lower biological value than the land that the project would impact. Page 42 of the Biological Resources Chapter notes this deficiency (underline is used for emphasis):

Policy BR 1.9 Preserve Ecotones. Require that proposed discretionary development protects and enhances ecotones, or natural transitions between habitat types because of their importance to vegetation and wildlife. Ecotones of particular concern include those along the margins of riparian corridors, baylands and marshlands, vernal pools, and woodlands and forests where they transition to grasslands and other habitat types.

Potentially Inconsistent. It is currently unknown whether it would be feasible to locate and preserve coast live oak woodland within the range of Burton Mesa chaparral, as required by mitigation measure BIO/mm 13.1, because that combination of habitats is not a common occurrence. It is within this unique transitional area where certain special-status plant species thrive. Similar ecotones will be preserved on the Dana Ridge Mitigation Site, but it does not preserve the same habitat types or support the same woodland species.

CWF/CO-4

Page 74 of the Biological Resources Chapter of the DEIR provides further clarification of the problem, including discussion of the vegetation matrix that the project proposes to destroy and the possibility that the proposed mitigation strategy may not be feasible (underline is used for emphasis):

BIO Impact 15: The project will directly impact coast live oak woodland. Impacts would be significant and unavoidable (Class I).

Approximately 78.3 acres of the project area consists of coast live oak woodland. The proposed development will remove 75.3 acres (approximately 96%) and preserve 3 acres (approximately 4%) of this habitat on-site. The *Quercus agrifolia/Adenostoma fasciculatum – (Salvia mellifera)* alliance has a Global/State rank of G3/S3 and is considered a sensitive natural community by the CDFW (CDFW 2021b). Therefore, loss of almost all (approximately 96%) *Quercus agrifolia/Adenostoma fasciculatum – (Salvia mellifera)* habitat would be considered significant, and mitigation is necessary to reduce project impacts. On-site mitigation opportunities are limited; therefore, off-site conservation and restoration would be required to fully mitigate for project impacts.

County COSE Policy BR 3.3.1 requires the maintenance of the integrity and diversity of oak woodlands, chaparral communities, and other significant vegetation as part of the compliance with the Oak Woodlands Preservation Act (PRC Section 21083.4). The coast live oak woodland in the project area regularly integrates with the Burton Mesa chaparral. The main difference between the designation of Burton Mesa chaparral and coast live oak woodland is that the canopy threshold of coast live oak trees does not exceed 20% absolute cover. Other than this, these two vegetation communities are virtually identical in terms of species composition. Many of the species described within Burton Mesa chaparral are also present in coast live oak woodland and vice versa. These two vegetation communities, along with the coast live oak forest and California native perennial grassland, create a habitat matrix that, when left intact, supports a wide range of native and special-status species. Specifically, this diverse habitat supports a unique assemblage of nine special-status plants, most of which are highly endemic to coastal communities in San Luis Obispo and Santa Barbara Counties. In order to maintain the diversity of oak woodlands in the County, per County COSE Policy BR 3.3.1, mitigation for coast live oak woodlands should occur adjacent to the conservation/restoration of Burton Mesa chaparral on sites with sandy soil conditions suitable to support the special-status plant species that occur in the project area. This would effectively maintain and/or recreate the habitat matrix that supports the unique assemblage of species that would be lost as a result of the proposed project. However, implementation of this mitigation may not be feasible; therefore, potential impacts would be significant and unavoidable.

CWF/CO-4
(cont'd)

The Biological Resource's chapter's discussion on pages 73 and 74 of BIO Impact 14 notes that the applicant may fulfill half of the mitigation requirement through Restoration of Mesa chaparral in Santa Barbara County. The trade-off of San Luis Obispo County's unique biological resources for a housing development that may not achieve affordable housing goals is not supportable. Further, the Biological Resource chapter's discussion on page 95 of BIO Impact 20 indicates additional anticipated development will further degrade remaining sensitive vegetation areas that support threatened and endangered plant populations, as noted below.

CWF/CO-5

The DEIR also discusses wildlife habitat provided by the site's oak woodlands, noting that analysis conducted to-date has not been adequate to determine the presence of some special status species (page 6 of Executive Summary). (Underlined text is added for emphasis.):

Coast live oak woodland habitat within the Specific Plan Area supports Blainville's (Coast) horned lizard (*Phrynosoma blainvillii*), a CDFW SSC (CDFW 2022), which was observed on-site during surveys (Althouse and Meade 2022a). The following special-status species are also supported by coast live oak woodland habitat but are unlikely to be observed without appropriately timed focused surveys: northern California legless lizard, pallid bat, silver-haired bat, western red bat, hoary bat, Yuma myotis. USFWS BCC observed in oak

CWF/CO-6

woodlands include the cavity-nesting oak titmouse and Nuttall’s woodpecker (USFWS 2008). Coast live oak woodlands support many songbirds, raptors, and common rodents, such as mice, voles, and woodrats. Oak tree canopies, cavities, and loose bark may provide roosting habitat for multiple bat species, including little brown bat and California myotis.

↑
CWF/CO-6
(cont’d)

Project impacts to the oak forest and plants and wildlife dependent upon the habitat are also profound, as described on page 82 of the Biological Resources chapter:

The project will result in the permanent loss of up to 21.7 acres in the proposed plan of available coast live oak forest habitat. Approximately 17.0 acres of coast live oak forest will be protected as a biological open space easement on site. The remaining 21.9 acres the coast live oak forest and remnant woodland patches would be indirectly impacted by recreational activities from the surrounding community, the invasion of non-native species used in landscaping, and regular fire fuel management activities that would occur within a 100-foot buffer of any structures.

↑
CWF/CO-7

Coast live oak forest contributes significantly to the project area’s overall biological diversity, indirectly supporting eight special-status plants (Pismo clarkia, mesa horkelia, Nipomo Mesa ceanothus, mesa manzanita, Michael’s rein orchid, California spineflower, sand almond, and sand buck brush) and directly supporting four special-status nesting birds (Cooper’s hawk, oak titmouse, white-tailed kite, and Nuttall’s woodpecker). Sensitive reptiles such as Blainville’s horned lizard are also supported by this habitat. California’s Central Coast contains 90% of the state’s coast live oak forests (Gaman 2008). This habitat type is considered sensitive due to its biological diversity and presence of sensitive plant and animal species; therefore, impacts are considered significant, and mitigation is required to reduce project impacts.

Additional inconsistencies with San Luis Obispo County policies: The project also results in a net loss of oak trees, which is inconsistent with Biological Resources Policy 1.4 No Net Loss. The DEIR conclusion that there is a “potential” inconsistency in the proposal to remove greater than 3,943 oak trees and to replant 194 trees is intellectually dishonest. As described on page 42 of the DEIR’s Executive Summary: “Of the 3,943 oak trees to be removed, Mitigation Measure BIO/mm-17.2 only requires the applicant to plant replacement trees for 194 of the trees being removed. At this level, this is a significant net loss of oak trees and acreage of oak woodlands in the County.” The replacement trees will require many years to reach maturity and, if the restoration is successful, replace the habitat value of the trees that are meant to be removed. Further, the mitigation strategy does not include a plan for the lost ecosystem services as the trees mature, nor does it mitigate for GHG impacts of the tree removals, as discussed below.

↑
CWF/CO-8

Among the project’s many other inconsistencies with San Luis Obispo County policies, the General Plan Conservation and Open Space Element’s Biological Resources Goal 1 is that “native habitat and biodiversity will be protected, restored, and enhanced.” Again, the DEIR

↑
CWF/CO-9

describes the native oak tree impacts as “potentially inconsistent” when the proposal clearly runs counter to this goal.

↑ CWF/CO-9
(cont'd)

The DEIR continues to characterize “potential inconsistencies” with the following Biological Resource policies from the General Plan (see pages 4 and pages 41-44 of the Biological Resources chapter of the DEIR) despite the proposal’s clear plan to violate these policies:

Policy BR 3.1 Native tree protection. Protect native and biologically valuable trees, oak woodlands, trees with historical significance, and forest habitats to the maximum extent feasible.

Policy BR 3.2 Protection of native trees in new development. Require proposed discretionary development and land divisions to avoid damage to native trees (e.g., Monterey Pines, oaks) through setbacks, clustering, or other appropriate measures. When avoidance is not feasible, require mitigation measures.

Policy BR 3.3 Oak Woodland Preservation. Maintain and improve oak woodland habitat to provide for slope stabilization, soil protection, species diversity, and wildlife habitat.

Policy BR 1.2 Limit development impacts. Regulate and minimize proposed development in areas that contain essential habitat for special-status species, sensitive natural communities, wetlands, coastal and riparian habitats, and wildlife habitat and movement corridors as necessary to ensure the continued health and survival of these species and protection of sensitive areas.

Policy BR 2.6 Development impacts to listed species. Ensure that potential adverse impacts to threatened, rare, and endangered species from development are avoided or minimized through project siting and design. Ensure that proposed development avoids significant disturbance of sensitive natural plant communities that contain special-status plant species or provide critical habitat to special-status animal species. When avoidance is not feasible, require no net loss of sensitive natural plant communities and critical habitat areas.

CWF/CO-10

The proposed project is also inconsistent with County of San Luis Obispo Inland Land Use Ordinance (Title 22) Section 22.98.072(H)(1)(e) Landscaping: “Retain and incorporate existing vegetation as much as feasible into the subdivision design.” (See pages 47-48 of Biological Resources chapter of DEIR.)

As noted in CWF/CO’s July 2021 letter, section 4.5 of the South County Area Plan addresses the site’s oak woodland: “The property has a large oak woodland that should be evaluated for preservation as a long-term habitat.” The letter also referenced San Luis Countywide Design Guidelines, which specify that development should conserve special areas identified as having high ecological sensitivity, listing oak woodlands as examples of natural resources to preserve: “Development should be designed to preserve and protect existing native trees on site if

feasible.”³ Lastly, the letter referenced San Luis Obispo County’s Voluntary Oak Management Plan, which states: “Fragmented habitats provide fewer values for the plant and animal species that remain, increasing competition for resources, and isolating populations, which can lead to a decrease in both plant and animal diversity.”⁴ The proposed oak destruction has risen, since the Initial Study was released, from greater than one third of the site’s oaks to greater than three quarters (76%).

CWF/CO-11

CWF/CO-12

Additional impacts: The proposed removal of greater than 3,943 oaks—1,073 from oak forest, 2,676 from oak woodland, and 194 from Burton Mesa chaparral and grassland habitat—is, according to the discussion of BIO Impact 19 on page 93 of the Biological Resources chapter of the DEIR, not representative of the full extent of oak removals that would result from the build-out of the proposed project: “Off-site transportation improvements and/or trenching of new water and wastewater pipelines could result in direct and indirect impacts to oak trees.”

Cumulative impacts resulting from loss of open space and associated habitat from development generated by the proposed project will further degrade San Luis Obispo County’s biodiversity, as articulated in the discussion of BIO impact 20 on page 95 of the Biological Resource’s chapter:

Several of the projects occur on or in the vicinity of a limited number of potential mitigation areas for Burton Mesa chaparral on the Nipomo Mesa (Figure 4.4-14). Each project individually may not have a significant impact on this natural community or the plant species that rely on it, such as mesa horkelia, Nipomo Mesa ceanothus, and sand mesa manzanita. However, considered collectively with the proposed project, these projects could potentially be significant in preventing the recovery of this natural community or these species on the Nipomo Mesa.

CWF/CO-13

The construction of the DRSP would result in significant cumulative impacts to Burton Mesa chaparral and coast live oak woodland and the rare plant species that are endemic to these areas, such as the Nipomo Mesa ceanothus and mesa horkelia. The project would induce substantial unplanned population growth on the Nipomo Mesa. The addition of new commercial infrastructure that supports residential developments (e.g., grocery stores, gas stations, etc.) will increase the appeal for additional homes to be built in rural residential areas on the Nipomo Mesa, thus further reducing and degrading remaining sensitive vegetation areas that support threatened and endangered plant populations. Therefore, the project would result in a *significant and unavoidable cumulative impact* to biological resources

DEIR does not analyze nor provide mitigation for greenhouse gas impacts of tree removals: Chapter 4-8, GHG Emissions, and Appendix D, Air Quality and Greenhouse Gas Emissions Background Information, have no discussion of the GHG emissions of the proposed tree

CWF/CO-14

³ See 1 and 99.

⁴ See 10.

removals. The only discussion of trees is about attempts to avoid tree damage in constructing roadway infrastructure and the cooling and shading attributes of trees that will be planted—with no discussion of the heating impacts of the proposed tree removals.

↑
CWF/CO-14
(cont'd)

California requires the analysis and mitigation of greenhouse gas emissions associated with proposed oak woodland or forest conversions. California Environmental Quality Act's (CEQA) sole GHG focus is "the mitigation of greenhouse gas emissions or the effects of greenhouse gas emissions." Net present value of GHG emissions forms the foundation of the state's greenhouse reduction objectives, as well as the California Forest Protocol preservation standards. Every ton of carbon dioxide (CO₂) released into the atmosphere by oak woodland or forest conversion represents a measurable potential adverse environmental effect, which is covered by CEQA.

—
CWF/CO-15

If this ill-conceived project advances, it is necessary to include mitigation for these impacts. Mitigation that is based on the preservation ("avoided conversion") of existing natural lands does not adequately mitigate GHG emissions of natural lands conversion. Existing trees, understory, and soil conserved by the mitigation, do not, suddenly, upon the protections afforded by their conservation sequester more carbon to mitigate impacted biomass GHG emission effects of the conversion.

—
CWF/CO-16

The proposed project runs counter to necessary steps to protect biodiversity and carbon sequestration, which are articulated in many San Luis Obispo County policies. The proposed retention and installation of trees along the highway to create a "visual screening zone" (AES/mm-3.1) is reminiscent of clear-cut practices of the timber industry—window dressing for a project that would unravel vital habitat without addressing the state's affordable housing crisis. This project must not go forward as proposed.

—
CWF/CO-17

Thank you for your consideration of our comments.

Sincerely,



Janet Cobb
Executive Officer
California Wildlife Foundation
jcobb@californiawildlifefoundation.org



Angela Moskow
Manager
California Oaks Coalition
amoskow@californiaoaks.org

cc: Neil Havlik, PhD, California Native Plant Society, neilhavlik@aol.com

Nicholas Jensen, PhD, California Native Plant Society, njensen@cnspp.org

Brian Trautwein, Environmental Defense Center,
btrautwein@environmentaldefensecenter.org

Tiffany Yap, DEnv, PhD, Center for Biological Diversity, tyap@biologicaldiversity.org

9.3.1.1 **Response to Letter from California Wildlife Foundation / California Oaks Coalition**

Comment No.	Response
CWF/CO-1	<p>The comment asserts that the County of San Luis Obispo should not advance this project because it will degrade the county's biodiversity while not necessarily advancing affordable housing. The EIR identified a significant and unavoidable impact to oak woodlands due to the loss of diversity of oak woodlands in the County (BIO Impact 15), consistent with this comment. The statement that the project would not necessarily advance affordable housing is inaccurate; the referenced page 70 of the <i>Executive Summary</i> relates to Alternative 3 (the identified Environmental Superior Alternative), not the proposed project, which would advance the County's affordable housing goals. No changes to the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration.</p>
CWF/CO-2	<p>The comment states that the no project alternative should be the preferred alternative due to the impacts to oak trees, inadequate mitigation, inconsistencies with County habitat protection policies, off-site impacts to oak trees, and unplanned population growth with additional cumulative impacts. The comment speaks to the merits of the project vs. the no project alternative but does not raise specific questions about the adequacy of the environmental analysis. Please see Master Response MR-3 related to Oak Tree, Oak Woodland, and Burton Mesa Chaparral Impacts, including the analysis of comparative impacts to those resources under a range of different project alternatives.</p> <p>The decision-making body will review all of the alternatives and comments received in response to the Draft EIR for consideration prior to selecting a preferred alternative and approving the project. No changes to the environmental document are necessary in response to this comment.</p>
CWF/CO-3	<p>The comment states that the Greenhouse Gas chapter (Section 4.8) fails to analyze or propose mitigation for the impacts of proposed tree removals. Please see Master Response MR-3 related to Oak Tree, Oak Woodland, and Burton Mesa Chaparral Impacts, including the response specifically related to carbon sequestration.</p>
CWF/CO-4	<p>The comment asserts that environmental impacts will degrade unique and irreplaceable San Luis Obispo County oak habitat and proposed mitigation is inadequate. As discussed in Section 4.4, <i>Biological Resources</i>, impacts to oak habitat (BIO Impact 15 and BIO Impact 18) are considered significant. Mitigation, including off-site mitigation for coast live oak woodland, preparation of an on-site tree protection plan for trees to be retained, preparation of a tree replacement plan, protection for on-site oak woodland resources intended to be retained and preserved on-site, and off-site preservation has been included to address impacts to oak resources. The comment inaccurately asserts that land to be preserved at Dana Ridge is of lower biological value than the land that would be impacted. The oak woodland and chamise chaparral habitat to be preserved at Dana Ridge is of very high quality, equal to or exceeding that at the project site. However, it is not the exact same type or mix/matrix of habitat that would be impacted at the project site; therefore, the EIR concluded that it was not in-kind mitigation that would fully mitigate impacts. Impacts to on-site oak woodland alone could potentially be mitigated to less than significant within the County, and impacts to the on-site degraded Burton Mesa chaparral alone could potentially be mitigated to less than significant within the County. However, the areas in which the two interact in the same way they do at the Dana Reserve are very limited; therefore, no feasible mitigation was available to reduce this combined impact and, thus, no such mitigation is being proposed. Impacts were identified as significant and unavoidable.</p> <p>As detailed in Section 4.4, mitigation would reduce direct and indirect impacts to coast live oak woodland, coast live oak forest, and individual oak trees; however, due to the potential infeasibility of mitigation, the significant net loss of oak trees and acreage of oak woodlands in the county, and lack of proper in-kind preservation and restoration of coast live oak woodland habitat on similar soil types and in an elevation range similar to the project area, residual impacts are still considered significant and unavoidable (Class I).</p> <p>A range of project alternatives was evaluated in Chapter 5, <i>Alternatives Analysis</i>, to address the project's significant and unavoidable impacts. The No Project Alternative and Alternatives 2, 3, and 4 would all result in reduced impacts to biological resources compared to the proposed project. Ultimately, it will be the decision of the lead agency's decision-making body whether or not to reject or approve the proposed project or an alternative. No changes to the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration. Refer also to Chapter 10, Supplemental Analysis of the 2023 DRSP, which included revisions to the proposed project to reduce potential impacts to oak trees.</p>

Comment No.	Response
CWF/CO-5	<p>The comment states the trade-off of San Luis Obispo County's unique biological resources for a housing development that may not achieve affordable housing goals is not supportable. The statement that the project would not necessarily advance affordable housing is inaccurate (refer to Response to Comment CWF/CO-1 above). Additionally, BIO Impact 14 identified a significant and unavoidable impact related to the loss of Burton Mesa chaparral, in part, because mitigation in Santa Barbara County would not be in-kind or adequate to reduce potential impacts to less than significant levels, consistent with this comment. Refer also to Master Response MR-3.</p> <p>No changes to the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration.</p>
CWF/CO-6	<p>The comment refers to the DEIR discussion of wildlife habitat provided by the site's oak woodlands, noting that analysis conducted to date has not been adequate to determine the presence of some special-status species.</p> <p>The DEIR states that the coast live oak woodland habitat within the Specific Plan Area supports Blainville's (coast) horned lizard, which was observed on-site during surveys. The DEIR acknowledges that the coast live oak woodland habitat within the Specific Plan Area has the potential to also support the following special-status species which were not observed during surveys and were determined unlikely to be observed without appropriately-timed focused surveys: northern California legless lizard, pallid bat, silver-haired bat, western red bat, hoary bat, and Yuma myotis. As discussed in Section 4.4, <i>Biological Resources</i>, focused surveys were conducted for these species within the Specific Plan Area. No northern California legless lizards were encountered during 2020 focused surveys despite an intensive raking effort, and none were detected as of July 21, 2020 (Althouse and Meade 2022a). A focused survey for bat roosts and species identification was also conducted as part of this study. Pallid bats were observed visually and acoustically during the emergence survey. Silver-haired bats were confirmed present during 2020 nighttime acoustic surveys. No western red bats were detected during 2020 nighttime acoustic surveys. Hoary bats were confirmed present during 2020 nighttime acoustic surveys. Yuma myotis were observed during 2020 nighttime acoustic surveys. As discussed in BIO Impact 8, project activities, including tree removal, have the potential to impact special-status bat species and roosting bats. With implementation of Mitigation Measures BIO/mm-1.1 through BIO/mm-1.6, BIO/mm-8.1, BIO/mm-14.1, BIO/mm-15.1, and BIO/mm-18.4, impacts to bats would be less than significant with mitigation (Class II). No changes to the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration. Refer also to Appendix E of the EIR, which provides a detailed description of potential project-related impacts to sensitive habitat and special status species.</p>
CWF/CO-7	<p>The comment states that project impacts to oak forest, plants, and wildlife dependent upon the habitat are also profound, as described in Chapter 4.4, <i>Biological Resources</i>, Biological Resources chapter. The comment speaks to the merits of the project but does not raise specific questions about the adequacy of the environmental analysis. Please see Master Response MR-3 related to Oak Tree, Oak Woodland, and Burton Mesa Chaparral Impacts. No changes to the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration.</p>
CWF/CO-8	<p>The comment expresses concern related to inconsistency with local plans related to the protection of biological resources and GHG impacts related to the loss of oak trees.</p> <p>The term "potential" is used in the DEIR's policy consistency analysis because ultimately, it is a function of the local decision-making body (San Luis Obispo County Board of Supervisors) to make a determination regarding the project's consistency with applicable plans and policies. Therefore, the EIR preparers completed a consistency analysis of the proposed project, but only identified preliminary consistency findings (e.g., potentially consistent or potentially inconsistent). It should also be noted that perfect conformity with every general plan policy is neither achievable nor required (<i>Families Unafraid to Uphold Rural El Dorado County v. El Dorado County Board of Supervisors</i> [1998] 62 Cal.App.4th 1332, 1341-1342). The decision makers are required to evaluate the project's consistency with the General Plan as a whole and a project should only be found inconsistent with the General Plan as a whole when it conflicts with a general plan policy that is fundamental, mandatory, and clear.</p> <p>Refer also to Master Response MR-3. No changes to the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration.</p>

Comment No.	Response
CWF/CO-9	<p>The comment states the DEIR describes the native oak tree impacts as "potentially inconsistent" with the General Plan Conservation and Open Space Element's Biological Resources Goal 1, and states the proposal clearly runs counter to this goal.</p> <p>Please refer to response to comment CWF/CO-8. As discussed in Section 4.4, <i>Biological Resources</i>, the project would result in significant impacts to special-status plant species and sensitive natural communities that would constitute a net loss of species and habitat diversity in the county. Due to this inconsistency, residual impacts associated with BIO Impact 1, BIO Impact 4, BIO Impact 14, BIO Impact 15, BIO Impact 18, and BIO Impact 20 have all been found to be significant and unavoidable (Class I). No changes to the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration.</p>
CWF/CO-10	<p>The comment raises concern related to the project's consistency with applicable planning documents related to the protection of biological resources.</p> <p>Please refer to response to comment CWF/CO-8. A detailed discussion of the project's inconsistency with Biological Resource policies 3.1, 3.2, 3.3, 1.2, and 2.6 of the General Plan and County Land Use Ordinance (Title 22) Section 22.98.072(H)(1)(e) Landscaping is provided in Table 4.4-6, <i>Preliminary Policy Consistency Evaluation</i>. As described in Table 4.4-6, the project was determined to be potentially consistent with LUO Section 22.98.072(H)(1)(e) Landscaping because the project would protect the densest are of oaks on the property and includes replanting with native oaks. In addition, Mitigation Measure BIO/mm-17.2 requires planting pallets to include plants typical of the Nipomo Mesa native oak woodlands, consistent with this policy.</p> <p>Mitigation Measures BIO/mm-1.1 through BIO/mm-1.6, BIO/mm-2.1 through BIO/mm-2.3, BIO/mm-3.1, BIO/mm-4.1 and BIO/mm-4.2, BIO/mm-5.1, BIO/mm-6.1, BIO/mm-7.1, BIO/mm-8.1, BIO/mm-9.1, BIO/mm-11.1, BIO/mm-12.1, BIO/mm-13.1, BIO/mm-14.1, BIO/mm-15.1, BIO/mm-16.1, BIO/mm-17.1 through BIO/mm-17.3, BIO/mm-18.1 through BIO/mm-18.4, and BIO/mm-19.1 have been identified to address potentially significant impacts. Due to these potential inconsistencies and the potential lack of feasible mitigation options, residual impacts associated with BIO Impact 1, BIO Impact 4, BIO Impact 14, BIO Impact 15, BIO Impact 18, and BIO Impact 20 have all been found to be significant and unavoidable (Class I). Additionally, alternatives have been identified to reduce potential impacts on biological resources (refer to Master Response MR-3). No changes to the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration.</p>
CWF/CO-11	<p>The comment refers to CWF/CO's July 2021 letter, which referenced San Luis Obispo County's San Luis Obispo County's Voluntary Oak Management Plan.</p> <p>Section 4.4, <i>Biological Resources</i>, also states the proposed project would result in the conversion of oak woodland; therefore, it is subject to mitigation as mandated by SB 1334 and the County oak management plan. The EIR further discloses that, even as mitigated, the project would result in fragmented habitats that would not retain the habitat value currently provided within the undeveloped Specific Plan Area (e.g., refer to the Residual Impacts discussion under BIO Impact 14). No changes to the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration.</p>
CWF/CO-12	<p>The comment states the proposed "oak destruction" has risen since the Initial Study was released, from greater than one third of the site's oaks to greater than three quarters (76%).</p> <p>It is unclear where the "greater than one third" reference comes from, as the IS/NOP prepared for the project and circulated for public review in June-July 2021 did not quantify the extent of onsite impacts to oak trees or woodland.</p> <p>Regardless, potential impacts associated with the proposed project (including impacts to oaks) are thoroughly evaluated in the Draft EIR and are mitigated accordingly. No changes to the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration.</p>
CWF/CO-13	<p>The comment raises concern over cumulative loss of oak trees and habitat and biodiversity degradation.</p> <p>As discussed in Chapter 2, <i>Project Description</i>, off-site NCS D improvements have not been designed and their precise location is not currently known. For this reason, off-site improvements have been evaluated at a more programmatic level in the EIR. However, all off-site improvements would be located within existing road shoulder areas and/or public rights of way and potential impacts would be negligible. The direct, indirect, on-site, off-site, and cumulative impacts of the proposed project on biological resources are detailed in Section 4.4, <i>Biological Resources</i>, to the extent they can currently be evaluated. The comment does not point to any specific inaccuracy or deficiency in the EIR; rather, it largely quotes (like many other portions of the CWF/CO comment letter) the findings of the Draft EIR, presumably in order to highlight the significant adverse environmental effects to biological resources identified in the EIR. Refer to Master Response MR-3.</p>

Comment No.	Response
	No changes to the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration.
CWF/CO-14	The comment states that the DEIR does not analyze nor provide mitigation for greenhouse gas impacts of tree removals. Please refer to Master Response MR-3. No changes to the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration.
CWF/CO-15	The comment states that California requires the analysis and mitigation of greenhouse gas emissions associated with proposed oak woodland or forest conversions. Please refer to Master Response MR-3. No changes to the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration.
CWF/CO-16	The comment states that if the project advances, it is necessary to include mitigation for impacts related to GHG emissions from loss of oaks. Please refer to Master Response MR-3. As discussed in Section 4.4, <i>Biological Resources</i> , Mitigation Measures BIO/mm-1.1 through BIO/mm-1.6, BIO/mm-2.1 through BIO/mm-2.3, BIO/mm-3.1, BIO/mm-4.1 and BIO/mm-4.2, BIO/mm-5.1, BIO/mm-6.1, BIO/mm-7.1, BIO/mm-8.1, BIO/mm-9.1, BIO/mm-11.1, BIO/mm-12.1, BIO/mm-13.1, BIO/mm-14.1, BIO/mm-15.1, BIO/mm-16.1, BIO/mm-17.1 through BIO/mm-17.3, BIO/mm-18.1 through BIO/mm-18.4, and BIO/mm-19.1 have been identified to address potentially significant impacts. No changes to the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration.
CWF/CO-17	Please refer to Master Response MR-3 and responses to CWF/CO comments above. The comment speaks to the merits of the project but does not raise specific questions about the adequacy of the environmental analysis. No changes to the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration.

9.3.2 League of Women Voters of San Luis Obispo County

July 27, 2022

Department of Planning and Building
Attn: Jennifer Guetschow
jguetschow@co.slo.ca.us
976 Osos Street Room 300
San Luis Obispo CA 93408

RE: Dana Reserve Specific Plan Draft EIR

The League of Women Voters of San Luis Obispo County (LWV SLOCO) has reviewed the Draft Environmental Impact Report (DEIR) for the Dana Reserve Specific Plan and offers the following comments. LWV SLOCO supports measures that, “Pursue planning and land use policies and actions in keeping with long-range General Plans which provide for orderly land use, and which respect environmental and aesthetic considerations.” In addition, LWV SLOCO has policies which call for effective enforcement of “measures and procedures designed to attain General Plan goals.” The Dana Reserve Specific Plan is not compatible with, nor does it implement the current San Luis Obispo County General Plan priorities for the Canada Ranch (which is part of the Dana Reserve Specific Plan). Please respond to the following comments in the Final EIR.

1. Land Use: The proposed Specific Plan primarily accommodates residential uses which are currently supported only as incidental uses in the General Plan. The Draft EIR identifies this impact as “potentially compatible” because the Dana Reserve Specific Plan will replace the language in the General Plan to be consistent with what is approved. This finding does not address the inconsistency with the current General Plan direction. LWVSLO-1
2. Housing: With the median house price in the county coming in at \$875,000 as of June 2022, affordability of housing is a major concern. An individual or family that qualifies as Lower Income is earning a maximum of \$62,358 and cannot afford the housing proposed. The EIR needs to address the recent revocation of the County’s Inclusionary Housing Ordinance and associated fee and how this impacts the requirement to provide or contribute funds for affordable housing. “Affordable by Design” housing (i.e. housing that is smaller than 1,890 sq. ft. median size as of June 2022) does not qualify as affordable housing as it is not deed- or price-restricted and does not qualify under state laws as affordable housing. LWVSLO-2
3. Jobs-Housing Imbalance: The existing San Luis Obispo County General Plan direction for the area now being proposed as the Dana Reserve Specific Plan provided priorities for development of the property with the first priority listed as Open Space. Subsequent land uses were listed in priority order of Industrial, Commercial Service, Retail, Highway-oriented Retail; and finally, Residential in the lowest priority. Nipomo is already a bedroom community of primarily housing uses and workers in these dwellings must travel north or south to access head-of-household jobs. This imbalance in jobs versus dwellings creates impacts related to traffic, congestion, and air quality which is why the General Plan policies directed uses that would support job development for existing and future residents. While the draft EIR identifies this impact as significant and unavoidable, it does not offer mitigation. The final EIR should discuss an alternative that lessens LWVSLO-3

LWV SLOCO

Page 1 of 3

- | | |
|---|---|
| the imbalance even if it isn't possible to reduce impacts to less than significant levels. | <p>▲LWVSLO-3
 ↓(cont'd)</p> |
| <p>4. Biological: LWV SLOCO adopted policies support preservation of scenic, natural, and open space resources, including trees, vistas, streams and hills. The removal of over 4,000 mature oak trees and other native and endangered species does not appear to be consistent with either the local League's policies nor those of the County of San Luis Obispo. We will defer to others with more technical knowledge to address the particulars of how this impact should be addressed as part of the final EIR, but in general, the alternatives should explore a smaller development that leaves the oak woodland and associated habitat intact.</p> | <p>LWVSLO-4</p> |
| <p>5. Air Quality/GHG/Transportation: The DEIR identifies these impacts as significant and unavoidable. There are inconsistencies with the Sustainable Communities Strategy as well as Greenhouse Gas Emissions policies. While mitigations are offered including requiring Transportation Demand Management plans for the commercial uses (which have had mixed results), the bulk of the impacts will be coming from the large number of residential dwellings proposed. Proposed mitigations (i.e. only electric fireplaces, bike safety, providing shade on parking spaces and park and ride lots, for example) don't seem to address enforceable mitigations as required by CEQA to address the proportion of impacts from the residential uses. This overarching EIR will direct the requirements for future subdivisions and development and should provide more mitigation direction for the subsequent project level environmental reviews.</p> | <p>LWVSLO-5</p> |
| <p>6. Public Services: The DEIR identifies Fire Safety as a potential impact due to response time challenges for the proposed level of development in this location. The mitigation offered through the DEIR is to require dedication of land for a future fire station in an appropriate location. The LWV SLOCO supports this mitigation but would ask that directional language for future subdivision and development projects to address timing of fire station development be included in the final EIR. A dedicated vacant lot will not protect future development from emergencies and some threshold of development should be identified that would trigger the need for actual construction and staffing of a fire station to meet emergency response times.</p> | <p>LWVSLO-6</p> |
| <p>7. Recreation: The DEIR does not identify the Specific Plan development's demand for regional parks as an impact. While this determination relies on the underlying County methodology of counting open space as park space, the LWV SLOCO would offer that areas that are able to be seen but not accessed should not be included as parks space. Areas such as Bishop Peak, the Elfin Forest, Lopez and Santa Margarita Lakes; El Chorro, and Monarch Grove are included in the listed 11,991 acres of regional parks. However, much of these open spaces are natural areas and are not accessible for recreation. The DEIR lists parks as being in a surplus, however, removing some of these inaccessible areas of natural space from the calculation results in the development being not compliant with current goals for parks space per 1,000 residents. This may not be a policy inconsistency, but development will result in a physical adverse impact to the need for parks.</p> | <p>LWVSLO-7</p> |
| <p>8. Aesthetics: The DEIR finds many of the aesthetic impact to be "potentially inconsistent" with policy direction. The County's South County Inland Area Plan, Conservation and Open Space Element, and Framework for Planning policies all contain language that would require maintaining the rural nature of the area; minimizing landscape removal and grading; retaining land in open space to preserve oak woodlands; and biological qualities of the county's open spaces. Although</p> | <p>LWVSLO-8
 ▼</p> |

the project would preserve the existing oak ridge, the project would inherently change the visual character of the site and surrounding landscape through the introduction of commercial, institutional, and residential development; the removal of over 4,000 mature oaks; and substantial habitat loss and landform alteration. The LWV SLOCO proposes that these impacts are inconsistent, not potentially inconsistent. While replacement landscaping is proposed, this landscaping is placed in narrow strips and does not include grading to improve replacement landscaping's visual buffering. Wider strips with elevating berms should be discussed. The current proposal is more urban in appearance, would take decades to provide meaningful screening and restoration of the character of the site, and would not be able to replace the fauna displaced by the removal of the oak tree habitat.

↑
LWVSLO-8
(cont'd)

9. Alternatives discussion: The LWV SLOCO requests that additional discussion of alternatives be offered in the final EIR. The DEIR reviews several alternatives but appears to conclude that any reduction in the number of housing units proposed would prevent the development from including an affordable mix of housing. The discussion sets up a false dichotomy and is inadequate. There does not appear to be documentation of whether there is a threshold of residential units required to meet the project objectives or project feasibility.

↑
LWVSLO-9

For the above reasons, the LWV SLOCO recommends that the County of San Luis Obispo reconsider the type, scale, and location of development proposed in the Dana Reserve Specific Plan unless modifications to the project are required to respond to the many impacts identified in the DEIR. LWV SLOCO recognizes the need for housing and supports development of housing in appropriate locations. However, the DEIR for the Dana Reserve Specific Plan appears to indicate that the current location is not appropriate for the level of development proposed.

↑
LWVSLO-10

Thank you,

Cindy-Marie Absey
President, League of Women Voters of San Luis Obispo County

Neil Havlik
Co-Chair, Natural Resources Committee
League of Women Voters of San Luis Obispo County

Kim Murry
Co-Chair, Natural Resources Committee
League of Women Voters of San Luis Obispo County

9.3.2.1 **Response to Letter from League of Women Voters of San Luis Obispo County**

Comment No.	Response
LWVSLO-1	<p>The comment states that the proposed Specific Plan primarily accommodates residential uses which are currently supported only as incidental uses in the General Plan and that the Draft EIR identifies this impact as potentially compatible because the Dana Reserve Specific Plan will replace the language in the General Plan to be consistent with what is approved. The comment suggests this finding does not address the inconsistency with the current General Plan direction.</p> <p>The project includes a proposed General Plan Amendment, which inherently indicates it is requesting some revision to General Plan policy to accommodate a different use at the project site. The proposed General Plan Amendment is described under Section 2.5.4, <i>General Plan Amendment</i>, in Chapter 2, <i>Project Description</i>, of the EIR and analyzed throughout the document. In addition, Alternative 2 and Alternative 3 describe development scenarios that would be consistent with the current General Plan; these alternatives are analyzed in Sections 5.4.3 and 5.4.4 of the EIR and provide a comparison of the potential environmental impacts associated with the proposed General Plan Amendment. As indicated in Table 5-3, both Alternative 2 and 3 would result in decreased environmental impacts; however, neither would meet most of the project objectives, primarily providing a mix of residential uses, including affordable and market rate workforce housing. No changes to the EIR are necessary in response to this comment.</p>
LWVSLO-2	<p>The comment suggests the EIR needs to address the recent revocation of the County's Inclusionary Housing Ordinance and associated fee and how this impacts the requirement to provide or contribute funds for affordable housing. The comment states "Affordable by Design" housing (i.e., housing that is smaller than 1,890 sq. ft. median size as of June 2022) does not qualify as affordable housing as it is not deed- or price-restricted and does not qualify under state laws as affordable housing. Relevant sections of the EIR have been revised to clarify the County's previous Inclusionary Housing Ordinance has been repealed. The remainder of the comment does not address a specific environmental issue. No changes to the EIR are necessary in response to this comment. However, it should be noted that the EIR does not consider "affordable by design" housing as comparable to deed-restricted "affordable housing" that would qualify under state laws as affordable housing based on established household income ranges. The proposed affordable by design housing within the Dana Reserve Specific Plan Area would be market rate (not deed restricted) and is intended to meet the needs of workforce housing (or what's sometimes referred to as the "missing middle" housing need).</p>
LWVSLO-3	<p>The comment states that the imbalance in jobs versus dwellings creates impacts related to traffic, congestion, and air quality and suggests that the EIR discuss an alternative that lessens the imbalance. As discussed in Section 4.14, <i>Population and Housing</i>, the project would provide additional housing in the community of Nipomo, contributing to the unbalanced jobs-to-housing ratio, which has the potential to result in a range of adverse environmental impacts, including increased vehicle miles traveled (VMT); increased energy consumption, GHG emissions, and air pollutant emissions from additional commuters; and indirect impacts on other communities that build housing, such as loss of habitat.</p> <p>Buildout of the Dana Reserve Specific Plan (DRSP) would result in substantial unplanned population growth in the unincorporated community of Nipomo and adversely affect the local jobs-to-housing ratio within the Inland South County Planning Area. However, the project would also result in the construction of additional housing units that would help the County reach its housing development allocation goals per the County RHNA required by state law. Based on an evaluation of the project objectives, no feasible mitigation has been identified that would reduce this significant impact. Therefore, potential impacts associated with substantial unplanned population growth would be significant and unavoidable. Note: please refer to Chapter 10, which describes project changes since circulation of the Draft EIR that would reduce this impacts).</p> <p>As discussed in Chapter 5, <i>Alternatives Analysis</i>, Alternatives 2 and 3 would result in reduced population and housing impacts compared to the proposed project. Alternative 2 would substantially reduce the number of proposed residential units and would increase the amount of commercial and light industrial land uses at the project site. This alternative would be consistent with the growth envisioned in the General Plan for the Inland South County Planning Area. This buildout scenario would also aid the County in balancing the jobs-to-housing ratio within the region. However, since residential development would be more limited, Alternative 2 would be less effective in helping the County reach its housing development allocation goals per the County RHNA required by state law and other General Plan policy. In addition, due to the reduced number of proposed residential units, this alternative may be infeasible due to the need for expensive water, wastewater, and transportation infrastructure extensions/expansions to serve the project site. Because this alternative would generate less population growth than the proposed project and would be consistent with the General Plan, impacts related to population and housing would be decreased compared to the proposed project, as well as related impacts to associated issue areas (e.g., Air Quality, Greenhouse Gas Emissions, Transportation; refer to Table 5-3).</p> <p>Since no commercial development would occur under Alternative 3, this alternative would not generate new employment opportunities and, therefore, would not reduce impacts associated with jobs-to-housing balance.</p>

Comment No.	Response
	<p>However, because this alternative would reduce the number of new residents within the community and be consistent with the General Plan land use designation and planned growth projections for the site, Alternative 3 would not result in unplanned population growth. However, since residential development would be limited, this alternative would not help the County reach its housing development allocation goals per the County RHNA required by state law to the same extent as the proposed project. In addition, this alternative would result in minimal, if any, affordable housing units, which is inconsistent with the basic project objectives. Alternative 3 would generate substantially less population growth than the proposed project, and impacts related to population and housing would be decreased compared to the proposed project. No changes to the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration.</p>
LWVSLO-4	<p>The comment states the removal of over 4,000 mature oak trees and other native and endangered species does not appear to be consistent with either the local League's policies nor those of the County of San Luis Obispo and suggests the alternatives should explore a smaller development that leaves the oak woodland and associated habitat intact. Refer to Master Response MR-3.</p> <p>A range of project alternatives was evaluated in Chapter 5, <i>Alternatives Analysis</i>, to address the project's significant and unavoidable impacts. Alternatives 1, 2, 4, and 5 all include modified site plans which would include reduced development footprints and increased open space areas compared to the proposed project. The No Project Alternative and Alternatives 2, 3, and 4 would all result in reduced impacts to biological resources compared to the proposed project. Alternative 1 would retain approximately 4 acres of additional oak woodland habitat in the northeastern portion of the site, ultimately reducing the number of impacted oak trees. Under Alternative 2, approximately 137 acres of land would be retained for open space, reducing the number of impacted oak trees and the amount of other impacted native habitat (i.e., Burton Mesa chaparral) at the project site. Based on the significantly reduced development footprint, if properly situated, Alternative 2 could largely avoid direct removal and impacts to oak woodland and Burton Mesa chaparral. Buildout of the site under Alternative 3 would be reduced due to the lower density of clustered residential development, which would ultimately reduce the amount of impacted oak woodland and Burton Mesa chaparral habitat at the project site. Under Alternative 4, buildout would be predominantly limited to areas of non-native grassland and the potential to disturb special-status plant and wildlife species would be substantially reduced compared to the proposed project; however, minimized impacts to special-status plant and wildlife species and natural communities, including oak woodland and Burton Mesa chaparral, would continue to occur. Under Alternative 5, the density of residential units along the perimeter of the project site would be reduced, which would result in slightly less impacts to individual oak trees and oak woodland habitat that occur in those areas. Ultimately, it will be the decision of the lead agency's decision-making body whether or not to reject or approve the proposed project or an alternative. No changes to the environmental document are necessary in response to this comment.</p>
LWVSLO-5	<p>The comment raises concern related to consistency with applicable planning documents, including the Sustainable Communities Strategy and GHG policies, and asserts that the EIR should provide more mitigation direction for the subsequent project level environmental reviews.</p> <p>The DRSP has been developed with input from various governmental agencies and has employed strategic growth and transit-oriented development principles for site planning and infrastructure. All available feasible mitigation measures have been identified for construction-generated mobile-source and evaporative emissions, construction-generated fugitive dust, long-term operational emissions, long-term exposure to localized pollutant concentrations, and naturally occurring asbestos, consistent with the CEQA requirement that lead agencies mitigate environmental impacts to the greatest extent feasible. The DRSP EIR is intended to expedite the processing of future projects that are consistent with the DRSP and consistent with the analysis and findings of this EIR. Therefore, though the specific details of future developments within the DRSP are not currently known, this EIR evaluates a reasonable maximum development scenario that would be allowed by the Specific Plan, as illustrated in the Conceptual Master Development Plan. Each subsequent subdivision/development within the Specific Plan Area would be required to implement the mitigation requirements described in the EIR, which as stated above, include all known feasible mitigation to reduce impacts related to Air Quality, GHG emissions, and Transportation.</p> <p>If, when considering subsequent development proposals, the County determines that a proposed development would be consistent with the uses described herein and would not result in new or more severe significant environmental effects or require additional mitigation, the County can approve the project without additional environmental review (California Government Code Section 65457 and State CEQA Guidelines Section 15182). However, if there are significant changes proposed that are not consistent with the approved DRSP or the type and level of development analyzed in this EIR that the County concludes may result in new significant environmental impacts, additional environmental review would be required consistent with the requirements of State CEQA Guidelines Section 15162.</p> <p>No changes to the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration.</p>

Comment No.	Response
LWVSLO-6	<p>The comment expresses support for the dedication of land for a future fire station but requests that the language of the mitigation measure be revised to address timing for the development of the fire station. The precise timing of development of proposed residential and commercial uses within the Specific Plan Area is unknown and would depend on market factors and the goals of individual developers. However, based on a market analysis prepared by the project applicant and project goals, and for purposes of this EIR analysis, it is conservatively anticipated that the project would be built out over approximately 7 years. As discussed in Section 4.15, <i>Public Services</i>, the Specific Plan Area would be provided fire protection services by CAL FIRE Station 20. Based on the nature and scale of proposed development and associated population growth within a high FHSZ, the project would contribute to the increasing demand for fire protection services and the need for a new fire station in Nipomo. In order to offset the project's incremental demand on the existing need for fire protection services in the community, Mitigation Measure PS/mm-1.1 has been included to require the project to set aside land to provide a location for future development of a new CAL FIRE station. In addition, the project would be subject to payment of the County's Public Facilities Fees, which would provide funding for maintenance of existing and future facilities. Since exact timing of buildout is currently not known and dependent on market factors, the timing of buildout of the new fire station would be determined through coordination with the County of San Luis Obispo and California Department of Forestry and Fire Protection. No changes to the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration.</p>
LWVSLO-7	<p>The comment states the Draft EIR does not identify the Specific Plan development's demand for regional parks as an impact and suggests removing inaccessible areas of natural space from the parkland calculations included in the DEIR. Please refer to responses to comments SLOPRD-1 through SLOPRD-54 in Section 9.2.9, above. The County of San Luis Obispo Parks and Recreation Department has clarified in their comments on the DEIR that they have ample parkland and recreational land in the Nipomo area, including the 136-acre Nipomo Community Park, of which only 35 acres are developed with recreational amenities. What they lack is the funding to develop that land with additional recreational facilities. Therefore, the project has been revised to propose dedication of a privately maintained (but open to the public) park within the Specific Plan Area in conjunction with full payment of Quimby fees (refer to Chapter 10), consistent with the recommendation of the County Parks Department.</p> <p>As discussed in Section 4.16, <i>Recreation</i>, impacts related to increased use of existing neighborhood, community, and regional parks and other recreational facilities are evaluated in REC Impact 1. The assessment of park acreage and the threshold methodology are consistent with the County's General Plan and 2016-2018 Resource Summary Report. Following full buildout and the associated population increase, the County would provide approximately 41.5 acres of regional parkland per 1,000 residents in the county and approximately 5.6 acres of community parkland per 1,000 residents in the community of Nipomo. Since the County would continue to exceed established service goals for both regional and community parkland, there would be adequate parkland to provide recreation opportunities to new and existing residents. Based on the amount of available parkland, implementation of the project and associated population increase would not result in substantial deterioration of existing public recreation facilities.</p> <p>In addition to proposed residential, commercial, and light industrial uses, the DRSP includes the proposed development of on-site recreational facilities, including pedestrian, bicycle, and equestrian trails; 8.5 to 12 acres of pocket parks within proposed neighborhoods; an 11-acre public park; and 49.8 acres of open space areas. Construction of an additional public park within the community of Nipomo would increase the community park acreage to 147. Therefore, based on the total buildout population estimate of 24,326 residents in 2030 in the community of Nipomo, there would be approximately 6 acres of parkland per every 1,000 residents, which would exceed the goal of 2 to 3 acres of community parkland per 1,000 residents. Construction of the proposed on-site recreational facilities would reduce the demand on existing recreational facilities within the county and the community by providing new local recreational facilities within the Specific Plan Area. No changes to the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration. Refer also to Chapter 10, Supplemental Analysis of the 2023 DRSP.</p>

Comment No.	Response
LWVSLO-8	<p>The comment raises concern related to the identification of a number of “potentially” inconsistencies with applicable policies related to visual resources and the change in the visual character the site and surrounding area and adequacy of the proposed mitigation. The term “potentially inconsistent” is used in the DEIR’s policy consistency analysis because ultimately, it is a function of the local decision-making body (San Luis Obispo County Board of Supervisors) to make a determination regarding the project’s consistency with applicable plans and policies. Therefore, the EIR preparers completed a consistency analysis of the proposed project, but only identified preliminary consistency findings (e.g., potentially consistent or potentially inconsistent). It should also be noted that perfect conformity with every general plan policy is neither achievable or required (<i>Families Unafraid to Uphold Rural El Dorado County v. El Dorado County Board of Supervisors [1998] 62 Cal.App.4th 1332, 1341-1342</i>). The decision makers are required to evaluate the project’s consistency with the General Plan as a whole and a project should only be found inconsistent with the General Plan as a whole when it conflicts with a general plan policy that is fundamental, mandatory, and clear.</p> <p>As discussed in Section 4.1, <i>Aesthetics</i>, as a result of the loss of so many mature oak trees, extensive grading, and lack of visual screening, implementation of the DRSP would substantially degrade the existing visual character and quality of the project site and its surroundings. Mitigation has been included which would require a U.S. Route 101 Visual Screening Zone along the length of the project adjacent to the utility easement and U.S. Route 101 for the purpose of reducing visibility of the development and minimizing visual impacts to the vegetated visual character of the site and its surroundings as seen from the highway. The U.S. Route 101 Visual Screening Zone shall be a minimum width of 20 feet. The screening zone shall be in addition to the minimum 20-foot width of the utility easement. Existing trees in this zone shall be preserved. Additionally, replacement trees shall be planted within the “on-site” project boundaries in areas that maximize their visibility from public roadways and common areas. Replacement trees shall be planted from the following container sizes: 45% of the replacement trees shall be a minimum of 15-gallon container size, 45% of the replacement trees shall be a minimum of 24-inch box container size, and 10% of the replacement trees shall be a minimum of 48-inch container size. All replacement trees shall be maintained in perpetuity.</p> <p>Landscape Architect, Robert Carr, ASLA, prepared the impact analysis included in the <i>Aesthetics</i> section of the DEIR and determined Mitigation Measures AES/mm-3.1 and AES/mm-3.2 would be sufficient to reduce potential impacts to the visual character of the site and its surroundings to a less-than-significant level. No changes to the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration.</p>
LWVSLO-9	<p>The comment requests that additional discussion of alternatives be offered in the final EIR.</p> <p>In accordance with the CEQA Guidelines, appropriate alternatives for EIR analysis are those that meet most of the basic project objectives and avoid or substantially lessen any of the significant environmental effects of the proposed project. As described in Chapter 2, <i>Project Description</i>, one of the objectives of the project is to provide the primary project objectives identified for the DRSP include a diversity of housing types and opportunities for home ownership and rental, including affordable homes consistent with the goals and policies of the Housing Element of the <i>County of San Luis Obispo General Plan</i>, the County of San Luis Obispo (County) Inclusionary Housing Ordinance, and regional housing needs.</p>
LWVSLO-10	<p>The comment recommends the County reconsider the type, scale, and location of development being proposed unless modifications to the project are required to respond to the many impacts identified in the DEIR. Mitigation has been included throughout the DEIR to address identified impacts. Additionally, a range of alternatives has been identified and evaluated in an effort to reduce significant and unavoidable impacts. No changes to the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration.</p>

9.3.3 Nipomo Recreation Association

Jennifer Guetschow

From: Nipomo Recreation <nipomorecreation@gmail.com>
Sent: Friday, July 29, 2022 12:32 PM
To: Jennifer Guetschow
Subject: [EXT]Re: Dana Reserve Project

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

Dear Jennifer,

The Mission of the Nipomo Recreation Association is to enhance the quality of life for all residents of the Greater Nipomo are by providing diverse and quality recreation programs, services, athletic opportunities, and facilities in direct response to the needs of Nipomo.

Nipomo Recreation has many programs that benefit the Nipomo community. We offer Special Events throughout the year, Youth Basketball League, before and after school care, we own and operate three Little Bits Preschool & Toddler Centers, and we team up with LMUSD with the Bright Futures program, and much, much more. We provide service for families of children ages 6 weeks through 8th grade.

Our organization played a key role during the pandemic in meeting the needs of the most vulnerable families in our community. We support the Dana Reserve project for several reasons. The main reason is the land donation for a daycare center. This is a very real need in Nipomo. Families in our community have limited options for childcare. Our three preschools hear from families daily about the struggle for childcare and the impacts to their life at home and work.

The Dana Reserve will add to the childcare capacity for the community. While we recognize that the EIR considers the environmental impacts to the community we hope this will be weighed against the human impacts and benefits to the community.

Sincerely,

--

Jeff Long
Nipomo Recreation Association
CEO/Executive Director
nipomorecreation@gmail.com
c: 805-215-9295

NRA-1

9.3.3.1 Response to Letter from Nipomo Recreation Association

Comment No.	Response
NRA-1	The comment indicates support for the project and states that the Dana Reserve will add to the needed childcare capacity for the community and that this “human” impact and benefit should be weighed against the environmental impacts to the community. No changes to the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration.

9.3.4 Sierra Club Santa Lucia Chapter



July 29, 2022

Sierra Club comment on the Draft Environmental Impact Report for the Dana Reserve Specific Plan

The Santa Lucia Chapter of the Sierra Club represents the 3,000 members and supporters of the Sierra Club, the nation’s oldest and largest grassroots environmental group, residing in San Luis Obispo County. We find the Dana Reserve Specific Plan’s Draft Environmental Impact Report to be inadequate on multiple fronts:

Loss of carbon sequestration via mature oaks must be part of the EIR’s Greenhouse Gas emissions evaluation

This project proposes to clear 75 acres of coast live oak woodland and oak forest on the ranch—about 4,000 individual trees, covering 40 percent of the project area -- and plant “anywhere from 1,500 to 3,000 oak trees” as mitigation.

While it has always been obvious that the replacement of mature trees with saplings is a gesture toward mitigation as opposed to actual mitigation, it has become even less appropriate as the most urgent environmental issue of our time has taken shape over the last 30 years. With carbon emissions and climate change as the issue that all proposed developments must address, the full mitigation of such impacts must be a priority. This project proposes to remove @ 4,000 of the most efficient carbon absorbing trees -- six mature oaks can sequester 1 ton of CO2 per year -- replacing them with saplings that have nowhere near the CO2 absorption rate of mature oaks and which will take decades to achieve it.

Timothy J. Fahey, professor of ecology in the department of natural resources at Cornell University, states that “An approximate value for a 50-year-old oak forest would be 30,000 pounds of carbon dioxide sequestered per acre. The forest would be emitting about 22,000 pounds of oxygen.”

Further: “Forests need to have a permanence of 100 years to be effective carbon stores. So you plant your saplings and then you have to maintain the forest for 100 years.”

Better to retain the existing woodlands. Per the California Oak Foundation, “if we assume that our current oak woodlands and forests average 100 years of age, then we can expect to sequester almost three million tons of additional carbon a year by protecting and conserving these trees throughout the 21st century.”

SCSLC-1

SCSLC-2

The annual precipitation rate is overstated and unlikely to occur in the future

SCSLC-3

The DEIR does not consider the project to present a significant and unavoidable impact on water supply. The reader is assured that the Nipomo CSD has sufficient water supply to serve the project, and by 2025 the CSD will be “contractually required to increase the purchase of water from Santa Maria by an additional 700 acre-feet.”

Contrary to the evident belief of the authors of the DEIR, water is not a “voluntary groundwater reduction goal,” or a “Wholesale Water Supply Agreement,” or “minimum required water delivery,” or “the license agreement between the County of Santa Barbara and the NCSA,” or “the NSWP’s designed capacity,” or “pump replacements and additional system pipelines,” all of which the DEIR offers as proofs that the water to support the proposed development will be available.

SCSLC-4

In its discussion of actual water, the DEIR notes that one of the two sources of water for the proposed project is the Santa Maria River Valley Groundwater Basin. The DEIR states:

“Groundwater recharge of the basin occurs from rainfall percolation, riverbed recharge, subsurface inflows, and return flows. The average annual precipitation within the basin is 15.65 inches, based on data collected between 1958 and 2020 (MKN 2021).” In the Project Setting, the DEIR estimates annual rainfall as between 15 and 20 inches per year.

Per the NOWData program of the National Weather Service, mean precipitation in the region since 2000 has been 11.67 inches. Recent annual precipitation in the area has been as follows:

2018	8.63
2019	17.10
2020	8.28
2021	11.20

SCSLC-5

NWS precipitation levels for the first five months of 2022 are:

Jan.: 0.17

Feb.: 0.07

Mar.: 1.07

Apr.: 0.39

May: 0.00

In 22 years of measurements, the NWS recorded 1 year when precipitation for the project area met or exceeded 20 inches of rain, which was solely due to a record-breaking month in December 2010. Of the records lows set for minimum monthly precipitation over the last 22 years, 9 of the 12 record minimums (0.00) were set in the last 4 years.

This corresponds with California Drought Action’s finding that “2022 had the driest January, February, and March in over 100 years” (<https://drought.ca.gov>). Per the State of California, the last 3 years have produced “a historic level of dryness...and it’s only getting worse.”

↑
SCSLC-5
(cont'd)

This data should be weighed against the DEIR’s statement that average annual precipitation for the area -- if the average is calculated using data stretching back six decades -- is 15.65 inches. For current precipitation levels, see the National Weather Service data above.

↑
SCSLC-6

In noting that the region is currently in a Stage 4 drought condition, the DEIR appears to rely on the belief that the “voluntary reduction measures” triggered by Stage 4 and Stage 5 designations will assure available water in any drought condition of any duration. We note that the Governor has asked that Californians cut their water use by 15% from 2020 levels, but this has produced no more than a 3.7% reduction.

↑
SCSLC-7

The Draft EIR omits to mention or analyze the impact of aridification. The Final EIR should include current data on this phenomenon and analyze how the effect of increasingly arid conditions in California that are drying out soils may affect groundwater recharge and otherwise impact previous projections of the region’s future water supply.

↑
SCSLC-8

Significant air quality impacts are not “potentially consistent” with existing policies

In Table 4.3-7 “Project Consistency with the SLOAPCD’s CAP Transportation and Land Use Control Measures,” much reliance is placed on AQ/mm-3.3, repeatedly cited as a mitigation measure that will achieve potential consistency with policy goals on the avoidance of air pollution increases and toxic exposure, strategic growth, reduction of greenhouse gas emissions, transportation control measures, etc. However, the DEIR states at 4.2-25: “With incorporation of Mitigation Measure AQ/mm-3.3...to reduce operational air emissions, operational emissions of fugitive dust would exceed daily SLOAPCD thresholds; however, emissions would not exceed quarterly thresholds.”

↑
SCSLC-9

We note that residents and wildlife in the area breathe on a daily, not quarterly, basis, and therefore quarterly non-exceedance cannot be said to render the project’s air quality impacts “potentially consistent” with policies designed to protect residents from the impacts of breathing unhealthful air. No impacts that result in the conclusion that “the generation of criteria pollutants in exceedance of established daily emissions thresholds would be significant and unavoidable” can be said to be “potentially consistent” with existing policies.

Proposed mitigations for significant impacts to biological resources won’t work

The coast live oak woodland on the project site “provides important native habitat for plants and wildlife” and “contributes significantly to...the region’s overall biological diversity.” But virtually all the proposed mitigations of significant impacts to sensitive biological resources share one feature in common: They are more than likely to fail, as noted repeatedly at 5.2.2:

↑
SCSLC-10
↓

“...feasible mitigation may not be possible for all species....”

“...there is a lack of information about the cultural requirements to successfully propagate California spineflower at a large scale and Sand almond propagation is very difficult....”

“...due to the limited range of [Burton Mesa chaparral] and the limited availability of off-site mitigation parcels, implementation of this mitigation may not be feasible....”

“...mitigation for coast live oak woodlands should occur adjacent to the conservation/restoration of Burton Mesa chaparral on sites with sandy soil conditions suitable to support the special-status plant species that occur in the project area. This would effectively maintain and/or recreate the habitat matrix that supports the unique assemblage of species that would be lost as a result of the proposed project. However, implementation of this mitigation may not be feasible.”

We note the manner in which these impacts differ from the usual category of Class I “significant and unavoidable” impacts encountered in an EIR -- i.e. impacts are considered Class I because the mitigation measure will partially reduce the impacts but not below a level of significance (“Mitigation has been included to reduce VMT and associated emissions; however, VMT would still exceed established thresholds”). The Class I impacts to biological resources this project will inflict are significant not because mitigations will be unable to reduce impacts below an established threshold of significance, but because there will be no mitigation at all. The loss of impacted biological resources will be total. Terms such as “very difficult” and “may not be possible” – all impermissibly vague per the requirements of the CEQA Guidelines -- mask the fact that, at this point, the EIR is going through the motions, describing mitigations that cannot be attempted or will not work but which fulfill the obligation of proposing mitigations rather than admitting that there will be no mitigation measures for the impacts described.

SCSLC-10
(cont'd)

No overriding consideration can outweigh the project’s unmitigable significant impacts

In noting that the County of San Luis Obispo’s approval of this project will require the adoption of a Statement of Overriding Considerations due to its significant impacts, the DEIR suggests that “the County may determine the long-term benefits of the project, such as fostering additional regional housing opportunities, including affordable housing, [provide] substantial overriding considerations for approving the project despite the identified adverse environmental impacts that would result from implementation of the project.”

Before the County determines that a legally defensible Statement of Overriding Considerations can be based on the project’s affordable housing component, it would do well to note the project’s “cumulative impacts associated with substantial unplanned population growth,” which “would be significant and unavoidable” (5.2.2.5 - Population and Housing). Specifically, “The project would induce substantial unplanned population growth in the Nipomo area, resulting in a significant impact. Buildout of the DRSP would result in substantial population growth within the Inland South County Planning Area that is not specifically projected or planned for in local or regional County planning documents and would result in the exceedance of projected population growth for the unincorporated community of Nipomo.”

SCSLC-11

In other words, the project would provide an affordable housing component while significantly impacting population and housing and “increasing the jobs/housing gap.”

↑SCSLC-11
↓(cont’d)

It would be affordable housing provided by a project that relies on a future rate of annual precipitation that is extremely unlikely, while putting pressure on a water supply in a region that is already in Stage 4 drought conditions. It would be affordable housing provided by a project that will mean “maximum daily operational air pollutant emissions [that] exceed SLOAPCD’s operational significance thresholds” (and deteriorating air quality is not a selling point for potential home buyers). It would be affordable housing provided by a project that will result in “a cumulatively considerable impact to greenhouse gas emissions,” not even including the current and future sequestered carbon lost in the destruction of 4,000 mature oak trees. It would be affordable housing provided by a project that will run counter to the “goals and policies identified within the County of San Luis Obispo General Plan Conservation and Open Space Element, Framework for Planning (Inland), LUO, and South County Area Plan regarding preservation and no net loss of sensitive biological resources and preservation of rural visual character.”

The DEIR also notes that the project’s “air emissions and water usage...could indirectly impact agricultural operations near the project site and within the region” and that “it is reasonable to assume that development of the project site with residential and commercial uses could increase the development pressure on agricultural lands nearby the project site,” resulting in “conversion of farmland to non-agricultural use,” accelerating the loss of farmland. Hence, the County’s approval of a Statement of Overriding Considerations would risk sacrificing South County’s agriculture for a promise of affordable housing while assuring that a “deterioration in a jobs-to-housing imbalance would be anticipated to hinder regional and local improvements related to increased transportation mobility and potential increase in VMT.”

SCSLC-12

In short, the inclusion of a percentage of affordable housing will not override this project’s impacts to the environment and the economy of the region and the County. The Dana Reserve Specific Plan illustrates the reason why affordable housing should be an outcome of public policy, not left to the largesse of developers, inserted into a project proposal like a carrot on a stick for the sole purpose of persuading elected officials to ignore their project’s highly destructive environmental impacts.

Select the Burton Mesa chaparral avoidance alternative

The DEIR’s alternatives analysis states that “While the Burton Mesa chaparral avoidance alternative would substantially avoid and reduce impacts to biological resources; reduce air pollutant and GHG emissions, VMT, and unplanned population growth; and improve project consistency with applicable plans and policies, this alternative would not reduce significant impacts related to aesthetic resources.”

SCSLC-13

Aside from the attempt to claim that an aesthetic impact outweighs the avoidance of multiple significant impacts to the environment, the DEIR equates “aesthetic impact” with density and multi-family residential units.

The DEIR argues that this alternative does not “meet the basic project objective of providing a range of housing types, including affordable housing.” It’s clear that this alternative does provide a range of housing types, merely in a different ratio (“Single-family units would be reduced from 831 to 111 and multi-family units would be increased from 458 units to 704 units...resulting in a higher density of commercial and residential development along U.S. Route (US) 101.”

SCSLC-14

We cite the Urban Land Institute’s report “Higher Density Development: Myth and Fact:”

“Most public leaders want to create vibrant, economically strong communities where citizens can enjoy a high quality of life in a fiscally and environmentally responsible manner, but many are not sure how to achieve it.... Arguably, no tool is more important than increasing the density of existing and new communities, which includes support for infill development, the rehabilitation and reuse of existing structures, and denser new development.”

SCSLC-15

The argument that this alternative would not provide affordable housing is contradicted by the statement in the alternative analysis that “This alternative would also have the potential to facilitate the development of accessory dwelling units (ADUs).” And while the developer may not feel inclined to retain its promised percentage of this alternative’s 704 multi-family units and/or 111 single-family units as affordable housing, the County is able to require that designation.

SCSLC-16

As this alternative is the only one that would substantially avoid or reduce impacts to biological resources while reducing air pollutants, GHG emissions, VMT, and unplanned population growth while rendering the project consistent with applicable plans and policies, and as the DEIR’s arguments against housing density and its attempts to allege the loss of affordable housing are without merit, we urge the County to require Burton Mesa chaparral avoidance alternative.

SCSLC-17

Thank you for this opportunity to comment,

Andrew Christie, Director
Sierra Club – Santa Lucia Chapter
P.O. Box 15755
San Luis Obispo, CA 93406

9.3.4.1 Response to Letter from Sierra Club Santa Lucia Chapter

Comment No.	Response
SCSLC-1	The comment requests that the loss of mature oaks and associated carbon sequestration be discussed in Section 4.7, <i>Greenhouse Gas Emissions</i> . Please see Master Response MR-3 related to Oak Tree, Oak Woodland, and Burton Mesa Chaparral Impacts, including the response specifically related to carbon sequestration.
SCSLC-2	The comment asserts that it would be better to retain the existing woodlands. The impacts associated with the removal of oak trees have been thoroughly evaluated in Section 4.4, <i>Biological Resources</i> , and in Chapter 5, <i>Alternatives Analysis</i> . No changes to the environmental document are necessary in response to this comment. Please see Master Response MR-3 related to Oak Tree, Oak Woodland, and Burton Mesa Chaparral Impacts, including the response specifically related to carbon sequestration.
SCSLC-3	The comment states the annual precipitation rate is overstated and unlikely to occur in the future. The UWMP uses the average annual rainfall rate of 15.65 inches to evaluate the NCS D's water supply, which was summarized in the EIR. While precipitation varies over time, those changes are accounted for in the single-dry and multiple-dry year conditions that were evaluated in the UWMP. The EIR conservatively includes Mitigation Measure USS/mm-3.1 to address future development proposals that may be brought forward during an abnormally low rainfall year in the future in order to ensure there is adequate water supply to serve the existing NCS D service area and the proposed development. No changes to the environmental document are necessary in response to this comment.
SCSLC-4	The comment raises concern over the availability of water supply for the proposed project in addition to the existing community. The NCS D recently adopted its 2020 Urban Water Management Plan (UWMP), which characterizes the District's existing and future water supply during normal, single-dry, and multiple-dry year conditions. The UWMP concludes that the NCS D has more than enough available water supply for the existing and future NCS D service area during normal, single-dry, and multiple-dry year conditions. Additionally, a Water Supply Assessment (WSA) per the requirements of Senate Bill (SB) 610 was prepared for the proposed project, which concluded (consistent with the 2020 UWMP) that the NCS D would have adequate available water supply to supply water for the proposed project at full-buildout during normal, single-dry, and multiple-dry year conditions. Inevitably, there is a certain level of uncertainty regarding the availability of future water supplies, particularly given recent drought conditions, climate change, and the years-long anticipated build-out schedule of the project. Therefore, even though the analysis in the EIR consistently shows adequate water supply to serve the project, the EIR conservatively included Mitigation Measure USS/mm-3.1, which requires that prior to the issuance of development permits for any future project development phase, the project developer is required to provide proof of water supply sufficient to meet the estimated water demand for proposed development. The results of the UWMP and WSA were summarized in detail in Section 19, <i>Utilities and Service Systems</i> of the EIR. No changes to the environmental document are necessary in response to this comment. Refer also to Master Response MR-1, Groundwater Management and Impacts.
SCSLC-5	The comment raises concern regarding precipitation measurements used to guide the analysis of the EIR. Refer to Master Response MR-1, Groundwater Management and Impacts, and response to comments SCSLC-3 and SCSLC-4 for discussion related to precipitation and water supply. No changes to the environmental document are necessary in response to this comment.
SCSLC-6	The comment raises concern regarding precipitation measurements used to guide the analysis of the EIR. Refer to Master Response MR-1, Groundwater Management and Impacts, and response to comments SCSLC-3 and SCSLC-4 for discussion related to precipitation and water supply. No changes to the environmental document are necessary in response to this comment.
SCSLC-7	The comment raises concern regarding the availability of water supply for the project and the evaluation of potential drought conditions. Refer to Master Response MR-1, Groundwater Management and Impacts, and response to comments SCSLC-3 and SCSLC-4 for discussion related to precipitation and water supply and Mitigation Measure USS/mm-3.1. No changes to the environmental document are necessary in response to this comment.
SCSLC-8	The comment states that the Draft EIR omits to mention or analyze the impact of aridification. Refer to Master Response MR-1, Groundwater Management and Impacts, and response to comments SCSLC-3 and SCSLC-4 for discussion related to precipitation and water supply. No changes to the environmental document are necessary in response to this comment.

Comment No.	Response
SCSLC-9	<p>The comment raises concern related to air quality emissions.</p> <p>As stated in Section 4.3, <i>Air Quality</i>, the project would be potentially consistent with policies intended to reduce emissions of criteria air pollutants, PM, and TACs to meet federal and state standards with implementation of Mitigation Measures AQ/mm-3.1, AQ/mm-3.2, AQ/mm-3.3, GHG/mm-1.1, and TR/mm-3.1. AQ Impact 1 identifies a significant and unavoidable impact because the proposed project would be inconsistent with elements of the SLOAPCD's 2001 Clean Air Plan. No changes to the environmental document are necessary in response to this comment.</p>
SCSLC-10	<p>The comment raises concern related to the feasibility of mitigation included in the EIR to reduce impacts to biological resources.</p> <p>As discussed in Section 4.4, <i>Biological Resources</i>, mitigation has been identified for impacts to special-status plant and wildlife species, Pismo clarkia, mesa horkelia, Nipomo Mesa ceanothus, sand mesa, California Rare Plant Rank 4 and Watch List plant species, monarch butterflies, California legless lizards, Blainville's horned lizards, special-status birds, raptors, nesting birds, special-status and roosting bats, American badger, California red-legged frog, western pond turtle, two-striped garter snake, Burton Mesa chaparral, coast live oak woodland, riparian and aquatic habitat. A variety of mitigation measures has been identified to address impacts, including environmental monitoring; a worker environmental training program; covering excavations; erosion control; a public education program; prohibition of invasive plants; an incidental take permit; avoidance; preservation/restoration mitigation for rare plants; preconstruction surveys; special-status reptiles protection and relocation; nesting bird preconstruction surveys and nest avoidance; bat preconstruction surveys and passive relocation; badger den preconstruction survey and relocation; California red-legged frog, western pond turtle, and two-striped garter snake surveys and relocation; Conservation/enhancement/restoration for Burton Mesa chaparral; off-site mitigation for coast live oak woodland; delineation setbacks, timing constraints, and monitoring for riparian areas and aquatic habitats; an on-site tree protection plan for trees retained; a tree replacement plan; protection for on-site oak woodland resources; off-site preservation for oak woodlands; and oak tree monitoring. Impacts for which mitigation may not be feasible or sufficient to reduce the severity to be less than significant have been classified as significant and unavoidable (Class I). Constraints that would yield identified mitigation as impractical or infeasible are clearly defined in Section 4.4, <i>Biological Resources</i>.</p> <p>Pursuant to CEQA Guidelines Sections 15042 and 15043, the lead agency's decision-making body will review the CEQA document prepared for the proposed project and may reject the project if necessary in order to avoid one or more significant effects on the environment, or approve the project even though the project would cause a significant effect on the environment if the agency makes a fully informed and publicly disclosed decision that there is no feasible way to lessen or avoid the significant impact and identified benefits from the project outweigh the policy of avoiding significant environmental impacts of the project. No changes to the environmental document are necessary in response to this comment. Refer also to Master Response MR-3, Oak Tree, Oak Woodland, and Burton Mesa Chaparral Impacts.</p>
SCSLC-11	<p>The comment states that no overriding consideration can outweigh the project's unmitigable significant impacts.</p> <p>Pursuant to CEQA Guidelines Sections 15042 and 15043, the lead agency's decision-making body will review the CEQA document prepared for the proposed project and may reject the project if necessary in order to avoid one or more significant effects on the environment, or approve the project even though the project would cause a significant effect on the environment if the agency makes a fully informed and publicly disclosed decision that there is no feasible way to lessen or avoid the significant impact and identified benefits from the project outweigh the policy of avoiding significant environmental impacts of the project. The existing planned level of growth in the Nipomo region and countywide, is indicative of historic growth trends that have contributed to the existing "housing crisis." Growth and housing development in excess of historic trends is necessary to fix the extreme housing shortage in the state. No changes to the environmental document are necessary in response to this comment.</p>
SCSLC-12	<p>The comment states the inclusion of a percentage of affordable housing will not override this project's impacts to the environment and the economy of the region and the County.</p> <p>Please refer to response to comment SCSLC-11. The comment points to the identified significant impacts of the project, all of which are clearly stated in the EIR. No changes to the environmental document are necessary in response to this comment.</p>
SCSLC-13	<p>The comment states that the Burton Mesa chaparral avoidance alternative should be selected as the preferred alternative.</p> <p>State CEQA Guidelines Section 15126.6(c) requires that an EIR disclose potential alternatives that were considered and eliminated along with a brief explanation of the reason for elimination. Factors used to eliminate alternatives from detailed consideration include: (1) failure to meet most of the basic project objectives, (2) infeasibility, and/or (3) inability to avoid significant environmental impacts. As discussed in Chapter 5, <i>Alternatives</i>, the Burton Mesa Avoidance alternative does not meet the basic project objective of providing a range of housing types, including affordable housing, workforce housing, and affordable by design housing. Further, the reduced number of units and utility connections makes expansion of NCSD</p>

Comment No.	Response
	<p>infrastructure to serve the site more expensive per unit, increasing the challenges of providing affordable housing within the Specific Plan Area. Since this alternative does not meet the basic project objectives, is likely infeasible, and has the potential to generate new potentially significant impacts, this alternative was eliminated, consistent with State CEQA Guidelines Section 15126.6(c). No changes to the environmental document are necessary in response to this comment.</p>
SCSLC-14	<p>The comment states that the Burton Mesa chaparral avoidance alternative does provide a range of housing types. Refer to response to comment SLSLC-13.</p>
SCSLC-15	<p>The comment cites the Urban Land Institute's report "Higher Density Development: Myth and Fact" to support increasing the density of existing and new communities. The proposed Dana Reserve Specific Plan would substantially increase the density of development within the Specific Plan Area. Refer to Section 5.3.2 of the EIR, which evaluates an alternative that would develop the site consistent with the existing Residential Rural land use designation. No changes to the environmental document are necessary in response to this comment.</p>
SCSLC-16	<p>The comment asserts that the argument that the Burton Mesa chaparral avoidance alternative would not provide affordable housing is contradicted by the statement in the alternative analysis that "This alternative would also have the potential to facilitate the development of accessory dwelling units (ADUs)."</p> <p>As discussed in Chapter 2, <i>Project Description</i>, one of the project objectives is to provide a diversity of housing types and opportunities for home ownership and rental, including affordable homes consistent with the goals and policies of the Housing Element of the General Plan, the County's Inclusionary Housing Ordinance (now repealed and no longer in effect), and regional housing needs. In concurrence with the goals and policies of the County's Housing Element and intent of the former Inclusionary Housing Ordinance (County LUO Section 22.12.080), the DRSP includes the proposed donation of NBD 10 to a local non-profit(s) to allow for the construction of a minimum of 75 affordable residential units on-site. Additionally, an overarching goal and vision of the project is to provide affordable-by-design housing geared towards first-time homebuyers and starter homes. Based on market research done by the project applicant, NBDs 1 and 2 would provide the most affordable market-rate housing within the Specific Plan Area. In addition, NBDs 3, 4, 5, and 6 would provide 1,300- to 2,400-square-foot homes on 3,000- to 5,000-square-foot lots; market studies conducted by the project applicant indicate that the majority of development within these neighborhoods would be within an affordable range for workforce housing. Although there is no mechanism for ensuring long-term affordability of market-rate housing, the DRSP includes standards for the design, density, and type of housing in an effort to feasibly meet its goals for affordability by design. In addition, the proposed Development Agreement includes a variety of additional elements aimed at ensuring affordability goals are met.</p> <p>As discussed in Chapter 5, <i>Alternatives</i>, the Burton Mesa Avoidance alternative would facilitate the future development of 815 residential units, including 704 four-story multi-family units and 111 two-story single-family units. This alternative would also have the potential to facilitate the development of accessory dwelling units (ADUs). Under this alternative, the project would not provide a diversity of housing types, including affordable homes and workforce housing. In addition, water and wastewater service by the NCSD would likely be prohibitively expensive. No changes to the environmental document are necessary in response to this comment.</p>
SCSLC-17	<p>The comment states the Burton Mesa Avoidance alternative is the only one that would substantially avoid or reduce impacts to biological resources while reducing air pollutants, GHG emissions, VMT, and unplanned population growth while rendering the project consistent with applicable plans and policies. Refer to responses to comments SCSLC-13 through SCSLC-16, above. No changes in the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration.</p>

9.3.5 California Native Plant Society



July 30, 2022

Jennifer Guetschow
San Luis Obispo County
Department of Planning and Building
976 Osos Street, Room 300
San Luis Obispo, CA 93408

Sent via email to jGuetschow@co.slo.ca.us

Dear Ms. Guetschow:

These comments are submitted on behalf of the California Native Plant Society, San Luis Obispo Chapter regarding the Draft Environmental Impact Report (DEIR) for the proposed Dana Reserve Specific Plan project (Project). We have reviewed the DEIR and find the DEIR contains several deficiencies and believe it does not fully comply with CEQA. For the reasons detailed below, we believe the DEIR must be revised and recirculated to remedy these deficiencies.

The San Luis Obispo Chapter (CNPS-SLO) of the California Native Plant Society (Society) focuses on the protection of and education about native plant species and their natural habitats in San Luis Obispo County and portions of northern Santa Barbara County. The Mission of the Society is to protect CA's native plants and their natural habitats, today and into the future, through science, education, stewardship, gardening, and advocacy.

This development project contemplates a total of 1,289 new residential units on three adjoining parcels totaling 288-acres outside the Urban Reserve Line in the Nipomo Mesa area. A General Plan Amendment would be required to expand the Urban Reserve Line. Land uses would be changed from Residential Rural to Residential Single Family, Recreation, Residential Multi-Family and Commercial. The Dana Reserve Project is one of, if not the, largest proposed housing projects in San Luis Obispo County. We believe the project as proposed is too large for the site and must be reduced in size.

Thank you for the opportunity to comment on this Project.

I. The Project is inconsistent with its own identified Objectives (Project Description comments)

CEQA Section 15124(b) states "The statement of objectives should include the underlying purpose of the project and may discuss the project benefits." While the DEIR presents the objectives of the Project (DEIR at 2-13), it does not include a clear statement of the underlying purpose of the project. Furthermore, it is noteworthy that several of the objectives are in apparent conflict with Objective 9, which states "to maintain the large, centrally located oak woodland

↑
CNPS-1
↓

↑
CNPS-2
↓



area...and to minimize impacts to special status plants and animals on site.” The Project does little to minimize impacts to the oak woodland, oaks, and special status plant and animals. As discussed in the DEIR (Section 4.4) and below, it results in significant, unavoidable impacts to each of these resources.

↑
CNPS-2
 (cont'd)

II. The benefits of the Project as Listed on Page 2-14 of the DEIR are Questionable

The DEIR on page 2-14 also refers to the County’s Memorandum of Agreement and some of the benefits the County may receive from implementation of the Project. Listed here are:

- A. **“Implementing the County’s stated land use goals.”** We believe that, on balance, the Project’s inconsistencies with goals and policies, especially Open Space and Biological Resource policies, in addition to substantial unplanned population growth as discussed below in this letter, outweigh whatever land use goals are being referred to here. Therefore, this is not a benefit of the project.
- B. **“Dedication of an Open Space Easement, neighborhood park, and trail system.”** While we acknowledge the applicant’s set-aside of 17 acres of oak forest in an open space area, it is notable that this area is on steeper slopes and building in this area would be difficult regardless. According to the DEIR, and as spelled out below, the proposed Open Space protects only 4% of the oak woodlands on site, and 3% of the Burton Mesa chaparral.
- C. **“Providing for affordable housing in furtherance of the County’s Housing Element...”** Trading the unique biological resources of the Nipomo Mesa for a project that may not achieve affordable housing goals is not a benefit and is not supportable.
- D. **“Permanent conservation of 388 acres of oak woodland or similar habitat located off-site.”** As it is zoned agriculture and is located on steep slopes, the proposed Dana Ridge 388-acre site is not threatened with development. The proposed conservation easement is not functional mitigation for the significant and unavoidable impacts of the project on oak trees, oak woodlands, and oak forest habitats. This is not a benefit of the project.

↑
CNPS-3
 ↑
CNPS-4
 ↑
CNPS-5
 ↑
CNPS-6

III. The DEIR Fails to Adequately Address Biological Impacts

The DEIR identifies six Class I impacts to biological resources; we concur with those identified; however, we believe several have not been recognized as such (there are 10 Class I biological impacts, as discussed below) in addition to other issues.

- A. **Allowing Burton Mesa chaparral mitigation outside SLO County, or even off the Nipomo Mesa, is inadequate mitigation**

The DEIR on page 4.4-72 discusses the impacts to Burton Mesa chaparral, specifically the loss of 35 acres. The DEIR acknowledges that on-site mitigation opportunities are limited under the

↑
CNPS-7
 ↓



current project design; it further acknowledges that due to the limited nature of the community, even off-site mitigation opportunities are limited, and its feasibility is questionable. However, *BIO/mm-14.1*, while first stating that the protection, enhancement, and/or restoration of contiguous patches of Burton Mesa chaparral on the Nipomo Mesa is preferred, which we agree with, the mitigation still contemplates the fulfillment of this requirement by restoring Burton Mesa chaparral in Santa Barbara County (at an additional 2:1 ratio). This is not appropriate. CEQA requires that mitigation be “like for like” – allowing mitigation in an adjacent County should not be acceptable, just like allowing mitigation for loss of oak woodlands in an adjacent County would not be acceptable. While mitigation banks have been developed for wetland resources, and certain endangered species where an HCP has been prepared, we are not aware of this being done for this natural community. Why should SLO County forfeit its resources when the impact can be avoided?

↑
CNPS-7
(cont'd)

B. Off-site compensation for oaks and oak woodland is not a functional mitigation, and Dana Ridge is not an appropriate mitigation site for loss of oaks and Oak Woodland (Impacts 15 and 18)

The DEIR at 4.4.74 Mitigation *BIO/mm-15.1* addresses Off-Site Mitigation for Coast Live Oak Woodland (*Quercus agrifolia* / *Adenostoma fasciculatum* – [*Salvia mellifera*]). Here conservation of oak is addressed in the context of the ecosystem in which it is found, rather than as an isolated species. CNPS supports the analysis of the substitute habitat requirements, but also notes that locating suitable habitat may be impossible to either find or acquire. This is noted under “residual impacts” of BIO Impact 15 (Class 1) on DEIR page 4.4-75.

↑
CNPS-8

The DEIR summarizes impacts to Oak Woodlands in Impact 18 (DEIR at 4.4-79-82), in the context of a conflict with local plans and policies. The DEIR presents, in *BIO/mm-18.1*, at least four pages of detail on how to minimize damage to oaks that are retained on site. *BIO/mm-18.2* requiring an Oak Tree Replacement Plan (DEIR at 4.4-89) appears very complex, involving the essential re-creation of the habitat at some unknown off-site location, with some 40 species of plants listed as being part of such mitigation effort or of other landscaping. *BIO/mm-18.3* requires the protection of oaks on site through the development of an Oak Woodland Protection and Restoration Plan (DEIR at 4.4-91) that includes fuel management measures. *BIO/mm-18.4* requires off-site preservation of oak woodlands and forest at a 2:1 ratio (DEIR at 4.4-92) and identifies the applicant-proposed “mitigation” of conserving Dana Ridge Ranch. CNPS has for years had a Policy of not recognizing off-site compensation as mitigation.¹ In this instance, the Dana Ridge site is not appropriate for several reasons: (1) it is not threatened with development; (2) it is not visible or accessible to the residents of Nipomo; (3) it contains steep slopes that are most likely unbuildable; (4) it is introduced solely as a false claim to mitigate the large net losses to oak resources; and (5) it would be subject to the very restrictive oak removal standards of the County Oak Ordinance, and therefore oaks on the site would be effectively protected by that ordinance in the absence of any connection to Dana Reserve.

↑
CNPS-9

¹ California Native Plant Society. 1998. Policy on Mitigation Guidelines Regarding Impacts to Rare, Threatened, and Endangered Plants. Available online at cnps.org.



At DEIR Section 4.4.2.2.3 Oak Woodlands Conservation, the application of Senate Bill 1334 enabling of a destructive 'oak management plan' is described. We object to the use of an 'oak woodlands management plan' as an instrument to avoid the intent of the County Oak Ordinance to conserve oak trees with the no-net-loss policy. The developer is using the 'management plan' as a vehicle to implement a clause in Senate Bill 1334 to mitigate through use of conservation easements, (PRC 21083.4 (b) (1)), although this clearly violates the spirit of the County Oak Ordinance. In addition, the allowance under SB 1334 that mitigation will allow planting an "appropriate number of trees" (PRC 21083.4 (b) (2) (A)), with obligation to maintain the trees ending after seven years (PRC 21083.4 (b) (2) (B)) would not result in any certainty that trees would survive to maturity. SB 1334 also states that plantings "shall not fulfill more than one-half of the mitigation requirements of the project" (PRC 21083.4 (b) (2) (C)).

CNPS-10

It seems much more realistic and prudent to simply protect the existing oak woodland and have a smaller project. This avoids the costly, difficult, and lengthy task of trying to re-create the habitat, which, if successful, would take years to truly accomplish. The record is mixed at best. For example, the recent mitigation effort to replace removed oaks from the nearby Willow Road interchange at Highway 101 has gone on for at least seven or eight years at immense expense at a poorly chosen location (wrong soil type) and can be judged a failure.

CNPS-11

C. The impacts to Pismo Clarkia, Federally and State-listed, are not accurately represented (Bio Impact 2)

The DEIR indicates that eight "micropopulations" of Pismo Clarkia occur onsite (DEIR at 4.4-17 and Figure 4.4-5), having been documented during 2019 and 2020 surveys, but not in 2017 and 2018. Bio Impact 2 identifies potential direct and indirect impacts to Pismo Clarkia. Direct, unavoidable impacts are identified as loss of 0.02 acres of the 0.2 acres occurring onsite (DEIR at 4.4-53, Figure 4.4-9) from the construction of the arterial road "Collector B." The DEIR includes three mitigations, BIO/mm 2.1-2.3, that include obtaining an incidental take permit from CDFW, establishing a conservation easement, preparing a Habitat Management Plan, in addition to avoidance of patches identified during 2019 and 2020, in addition to the construction year. Further mitigation is required for the loss of the 0.02 acres, at a 3:1 ratio, "along appropriate boundaries of preserved oak woodland habitat areas" (DEIR at 4.4-56). The DEIR concludes impacts are significant but mitigated to insignificance. We disagree and believe the impacts are significant and unavoidable (Class I).

CNPS-12

CNPS experts have been involved in efforts to restore Pismo Clarkia². Pismo Clarkia is indeed a "sensitive" species: the patches are shifting and delicate — they can be extinguished by too much stability or too much impact and require the underlying soil and animal associates to be suitable. Translocation of populations and topsoil stockpiling may be successful for one or two

² Arcadis, 2009. Pismo Clarkia Restoration Study 2009 (Year 1) Mitigation and Monitoring Report, PXP – Arroyo Grande Oilfield, Pismo Beach, CA. Prepared for Plains Exploration and Production Company, 5640 South Fairfax Avenue, Los Angeles, CA 90056.



years, but with continued monitoring, the translocated and managed populations head toward steep and terminal decline. There are also issues with herbivory when treatments are placed next to oak woodlands and scrub types where there is adequate cover for brush rabbits. It is also doubtful that construction can be limited to what appears to be a small 50-60 ft. corridor for Collector B, which is also a corridor for water mains (DEIR at 2-9). Given this, the impacts to Pismo Clarkia are significant and unavoidable. CNPS has access to data supporting the long-term failure of Pismo Clarkia transplantation efforts which can be supplied on request.

↑
CNPS-12
(cont'd)

D. The impacts to Mesa horkelia, Nipomo Mesa ceanothus, and sand mesa manzanita are not accurately represented (Bio Impact 3)

The DEIR on page 4.4-57 identifies impacts to these species and states that impacts can be mitigated to insignificance through the implementation of BIO/mm-3.1 (preservation on or off-site at 1:1 and restoration at 2:1, respectively through a Habitat Mitigation and Monitoring Plan), in addition to BIO/mm 1.1-1.6 (construction protective measures), 14.1 (protect/restore Burton Mesa chaparral); and 15.1 (protect/restore oak woodland at 2:1 ratio). The DEIR states, on page 4.4-59:

↑
CNPS-13

“Therefore, it is imperative to preserve an existing population of each species at a 1:1 ratio along with enough suitable unoccupied habitat to reestablish populations prior to issuance of the grading permit. Preservation of an existing population will offset the temporal loss incurred until the reestablishment component of the mitigation can be successfully implemented. This is imperative because it is not always possible to successfully reestablish rare plants (CNPS 1998).”

The DEIR does not include locations of existing populations that would be preserved, and it is not assured that they will be found. Until these habitat areas are located and can be assured to be protected, impacts would be **significant and unavoidable (Class I)**

E. The DEIR fails to accurately assess impacts to migratory birds (no impact identified)

It is widely recognized that both migratory and resident bird populations depend on intact, healthy habitat. The Conservation and Open Space Element of the General Plan's Goal BR-1 states: *“Native habitat and biodiversity will be protected, restored, and enhanced.”* This Project is clearly inconsistent with this Goal, in addition to Policy BR 1.1: *“Protect sensitive biological resources.”* The DEIR concludes that there is no potential impact and there are no identified wetlands or wildlife movement corridors. CNPS strongly rejects this conclusion and finds that it fails to recognize that oak woodlands are often the terminus of either wintering species or nesting species, providing major food resources to species.

↑
CNPS-14

F. Impacts to Nesting Birds are Significant and Unavoidable (Class I)

The DEIR on page 4.4-65 identifies impacts to nesting birds and states that impacts can be mitigated to insignificance through the implementation of BIO/mm 7.1 (pre-construction surveys

↓
CNPS-15



CALIFORNIA
NATIVE PLANT SOCIETY

and nest avoidance), in addition to BIO/mm 1.1-1.6 (construction protective measures), 14.1 (protect/restore Burton Mesa chaparral); 15.1 (protect/restore oak woodland at 2:1 ratio); and 18.4 (off-site preservation of oak woodland at 2:1). However, the DEIR concludes for Impact 14, 15 and 18, for which these mitigations are proposed, that impacts are significant and unavoidable (DEIR at 4.4-73, 4.4-75, and 4.4-92). Given the substantial loss of habitat (Burton Mesa chaparral, oak woodland, oak forest) that would result from the Project, and the management of the Open Space that would remain, and the fact that these impacts are unavoidable, we believe that impacts to nesting birds are also significant and unavoidable Class I).

↑
CNPS-15
(cont'd)

G. Impacts to American Badger are Significant and Unavoidable (Class I)

The DEIR on page 4.4-67 and 68 identifies impacts to American badger, A CDFW species of special concern, and states that impacts can be mitigated to insignificance through the implementation of BIO/mm 9.1 (badger den preconstruction survey and relocation), in addition to BIO/mm 1.1-1.6 (construction protective measures), 14.1 (protect/restore Burton Mesa chaparral); 15.1 (protect/restore oak woodland at 2:1 ratio); and 18.4 (off-site preservation of oak woodland at 2:1). As stated above under Item F., the impacts for which these mitigations are proposed are significant and unavoidable. Given the substantial loss of habitat (Burton Mesa chaparral, oak woodland, oak forest) that would result from the Project, and the management of the Open Space that would remain, and the fact that these impacts are unavoidable, we believe that impacts to American badger are also significant and unavoidable (Class I). It is likely that American badger would be extirpated from the area due to the loss of open grassland habitat. American badger home range estimates are extremely variable across their range. While they will travel up to 6 miles in search of prey,³ two to two and a half square miles (1327-1549 acres) is typical for a male in California.⁴

↑
CNPS-16

IV. The DEIR Fails to Address Certain Issues Relating to Water Resources

A. The DEIR fails to address the dependence of the project on water imported by Nipomo Community Services District which should otherwise have been used to counter continued decline of groundwater storage in the area

CNPS concurs that the project will not directly contribute to the continuing decline in water storage under the Nipomo Mesa. This is because the project will only use imported water brought by pipeline from Santa Maria through the Nipomo Supplemental Water Project (NSWP).

Nipomo CSD has stated that the amount of imported water is sufficient to serve both this project and other potential future projects within the NCSA service area, while not contributing to pumping from Nipomo Mesa sources. The allocation of this imported water to serve future

↑
CNPS-17
↓

³ U.S.G.S. Western Ecological Research Center. 2017. Accessed 2022. American Badgers in San Diego County. <https://www.usgs.gov/centers/werc/science/american-badgers-san-diego-county>

⁴ CDFW. 1988-1990. California Wildlife Habitat Relationship System. American Badger Life History Account. Originally published in Zeiner et al., 1988-1990. California's Wildlife. Vol I-III.



development may severely constrain the use of the water in recovering groundwater levels in the basin.

The Nipomo Mesa Management Reports for 2020⁵ and 2021⁶ reveal a loss of groundwater storage of 8,807 AF in 2021 and 8,582 AF in 2020. This is also demonstrated by the Key Wells Index which shows continuing declines in well levels. In addition, the Reports show that groundwater extraction from the Nipomo Mesa Management Area was 13,677 AF in 2021 and 14,313 AF in 2020. This implies that about half of the extractions were mined from storage at a time when supplemental water was importing in 3,002 AF in 2021 and 3,809 AF in 2020.

NCSD notes that supplemental water imports could be as high as 3,000 AFY, which is less than half of the ongoing deficit. This raises the issue that imported water should first be dedicated to recharging the basin beyond the quantities currently being substituted at the well head by water imports.

Wastewater from the project will be treated at the Southland Wastewater Treatment Facility, which is situated at the extreme southeast corner of the Nipomo Mesa, and close to the 130 ft. high bluff bordering the Santa Maria River. Nipomo Mesa Management Reports illustrate groundwater contours showing flow to the southwest, so that it is extremely unlikely that the Southland plant will recharge the production aquifers beneath the Mesa, and more likely returning water to the Santa Maria area. It is also possible that the enhanced riparian vegetation in the creek on the opposite side of the freeway is evidence of recharge from the treatment plant. CNPS does not find evidence that the imported water would recharge the aquifers utilized in creating the Key Wells Index.

B. The DEIR fails to accurately point out inconsistencies with County policies

The DEIR on page 4.10-13, 14, 15 lists several policies from the Conservation and Open Space Element of the County General Plan. We offer the following observations:

(a) *General Plan Policy BR 4.1 Protect stream resources: Protect streams and riparian vegetation to preserve water quality and flood control functions and associated fish and wildlife habitat.* The conclusion of 'Potentially Consistent' cannot be made in view of the well-documented drawdown of water tables affecting Black Lake Canyon and associated wetlands. The project does not contribute to recovery of local water tables, and the increased impermeable surface generated by the project may inhibit local recharge.

(b) *General Plan Policy BR 4.4 Vegetated Treatment Systems (Low Impact Development Techniques). Promote use and maintenance of engineered, vegetated treatment systems*

⁵ Nipomo Mesa Management Area, 2021. Thirteenth Annual Report, Calendar Year 2020. Prepared by NMMA Technical Group. Submitted April 2021.

⁶ Nipomo Mesa Management Area, 2022. Fourteenth Annual Report, Calendar Year 2021. Prepared by NMMA Technical Group. Submitted April 2022.

↑
CNPS-17
(cont'd)

↑
CNPS-18

↑
CNPS-19

↑
CNPS-20



CALIFORNIA
 NATIVE PLANT SOCIETY

such as constructed wetlands, vegetated swales, or vegetated filter strips where they will reduce nonpoint source pollution from private and public development. The conclusion of 'Potentially Consistent' is speculative, as project plans show no substantial treatment areas to compensate from the pollution from the large number of vehicles and people using the area. This would include distributed waste from pets and other byproducts of human occupation not currently present at the site. Furthermore, pollutants might be concentrated at the collection ponds where natural soil processes would be less available for any current distributed treatment currently present at the site.

↑
CNPS-20
 (cont'd)

(c) *General Plan Policy SL 2.1 Protect watersheds and aquifer recharge areas. Give high priority to protecting watersheds, aquifer-recharge areas, and natural drainage systems when reviewing applications for discretionary development.* By design, this project increases impermeable surface and concentrates runoff water in basins situated at the perimeter of the project. Given that fine sediment and colloidal sediment load will also be concentrated in these basins, it is likely that recharge capacity will decrease over time. Table 4.10-2 shows that basin-provided storage volume totaling 1,249,104 cu. ft. is more than the code required capacity of 1,086,134 cu. ft. and therefore fully mitigated. We have concerns that the hydrologic calculations do not address the expected increased intensity of storms associated with global warming and the increased chances of atmospheric rivers hitting the central coast. We also do not see any provision in dealing with any basin overspill during such events. For example, the basin adjacent to Pomeroy would spill into residential neighborhoods, and overspill from the northeast pond would spill beneath the freeway onto the highly erodible slopes on the far side.

↑
CNPS-21

(d) *General Plan Policy WR 1.9 Discourage new water systems. Enable expansion of public services by community services districts and County service areas to serve contiguous development when water is available. Strongly discourage the formation of new water and sewer systems serving urban development at the fringe and outside of urban or village reserve lines or services lines. Strongly discourage the formation of new mutual or private water companies in groundwater basins with Resource Management System Levels of Severity I, II, or III, except where needed to resolve health and safety concerns.* We find that while the statutory wording of "new water system" may not seem to apply to the intention of NCS D to serve this development, this is in fact a new water system consuming imported water. As the groundwater condition is at RMS Level of Severity III, this would have prevented the developer from making a water import contract that was not channeled through NCS D, and therefore we find that this General Plan policy has been violated in spirit, if not in law. Furthermore, as we have noted in our comments at the start of this section, imported water would have been better utilized in recharging the groundwater rather than servicing new demand.

↑
CNPS-22

(e) *General Plan Policy WR 1.13 Density increases in rural areas. Do not approve General Plan amendments or land divisions that increase the density or intensity of non-agricultural uses in rural areas that have a recommended or certified Level of Severity II*

↑
CNPS-23
 ↓



CALIFORNIA
 NATIVE PLANT SOCIETY

or II for water supply until a Level of Severity I or better is reached unless there is an overriding public need. The DEIR notes "The intent of this policy is to encourage infill development and conserve water resources." As this development is at the northeastern margin of the NCSD service area, it hardly qualifies as infill. NCSD water service to an area north of the proposed development was emplaced as an emergency measure after that area ran out of water.

↑
CNPS-23
 (cont'd)

(f) *General Plan Policy WR 1.14 Avoid net increase in water use. Avoid a net increase in non-agricultural water use in groundwater basins that are recommended or certified as Level of Severity II or III for water supply. Place limitations on further land divisions in these areas until plans are in place and funded to ensure that the safe yield will not be exceeded.*

Framework for Planning Policy 3 Preserve and sustain important water resources, watersheds, and riparian habitats.

As noted elsewhere, the developer claims that the use of 100% imported water results in no violation of this policy. However, it is clear that basin safe yield is currently exceeded, and this is a 'further land division'. There is also a net increase in water use. As the project is solely dependent on imported water subject to legal agreements that could change over time, the project might at some future time need to depend on local groundwater.

↑
CNPS-24

(g) *Policy WR 3.3 Improve groundwater quality. Protect and improve groundwater quality from point and non-point source pollution, including nitrate contamination; MTBE and other industrial, agricultural, and commercial sources of contamination; naturally occurring mineralization, boron, radionuclides, geothermal contamination; and seawater intrusion and salts.* It is fairly obvious that human occupation will not improve over the water quality of water filtered by woodland and grassland, in spite of any mitigation imposed on the project.

↑
CNPS-25

In conclusion, even though water for the project would be supplied by the NCSD using imported water, we note several apparent policy inconsistencies, and importantly, that the project does not contribute to recovery of local water tables.

↑
CNPS-26

V. Air Quality, Greenhouse Gas Emissions, and Transportation

Regarding Air Quality, the DEIR also identifies that the project would conflict with the SLOAPCD Clean Air Plan, including inconsistencies with Land Use Planning Strategies L-3 Balancing Jobs and Housing (AQ Impact 1, DEIR at 4.3-25). Impacts would be significant and unavoidable (Class I). In addition, the DEIR states that the project would result in a cumulatively considerable net increase of criteria pollutants in exceedance of established SLOAPCD daily emissions thresholds (AQ Impact 3, DEIR at 4.3-32). Impacts would be significant and unavoidable (Class I).

↑
CNPS-27
 ↓



Regarding Greenhouse Gas Emissions, the DEIR also identifies that the project would generate VMT in a manner that would be inconsistent with SLOCOG's 2019 Regional Transportation Plan/Sustainable Communities Strategy and the effectiveness of the identified mitigation to reduce this impact below applicable thresholds is not certain (GHG Impact 3, DEIR at 4.8-28, 29). Therefore, even with implementation of identified mitigation, potential impacts would be significant and unavoidable (Class I). Cumulative impacts would also be significant and unavoidable (GHG Impact 5, DEIR at 4.8-30).

The DEIR Vehicle Miles Traveled (VMT) analysis concluded that the project's estimated VMT per Employee and residential VMT per capita are higher than the regional averages and that the project would generate an increase in regional VMT (DEIR at 4.17-40). Thus, buildout of the Specific Plan Area would exceed County VMT Thresholds of Significance and result in a significant impact. At buildout, the project would result in an overall increase in regional VMT and exceed County thresholds, resulting in a **significant and unavoidable impact to VMT** (TR Impact 3). This is also inconsistent with State CEQA Guidelines Section 15064.3(b). The DEIR at 4.17-48 also identifies **significant and unavoidable cumulative VMT impacts** (TR Impact 9).

CNPS-27
(con'td)

VI. Section 4.11 - The DEIR Fails to Establish Consistency with Applicable Plan and Policies

The EIR identifies potential inconsistencies with policies relating to air quality, biological resources, GHG emissions, transportation, land use planning, public services, and recreation. We emphasize several of these inconsistencies below.

A. The project would be inconsistent with the County General Plan, Conservation and Open Space Element, in addition to other elements of the General Plan.

As identified in the DEIR, the project would be inconsistent with several goals and policies of the Conservation and Open Space Element: Goal BR1 (Native habitat and biodiversity protection), Policy Br 1.2, 1.4, 1.9 and 2.6 (DEIR at 4.11-30). Goal BR3 requires the maintenance of the acreage of native woodlands, forests, and trees at 2008 levels. As stated above, the project would result in the direct loss of 35 acres of Burton Mesa chaparral (97%), 75 acres of oak woodland (96%), and 21.7 acres of oak forest. The project is thus inconsistent with this Goal, and Policies 3.1, 3.2, and 3.3, which relate to native tree protection and oak woodland preservation (DEIR at 4.11-31). The inadequate 1:1 replacement ratios and the extremely low on-site replacement of only 194 of the 3,943 trees to be removed supports this determination. The DEIR on page 4.11-37 concludes that **LUP Impact 5** (loss of habitats and resultant policy inconsistency) would be significant and unavoidable. We agree with this determination and suggest that this points to another alternative.

CNPS-28

From the standpoint of visual resources, Goal 2 requires that the natural and historic character and identity of rural areas be protected. The DEIR finds that the project "would inherently



CALIFORNIA
NATIVE PLANT SOCIETY

change the visual character of the site and surroundings through the introduction of commercial, institutional, and residential development; the removal of over 4,000 mature oak trees; and substantial landform alteration” (DEIR at 4.11-29). The project is inconsistent with this Goal.

Policy VR 2.1 requires that the review of proposed development encourage designs that are compatible with the natural landscape and with recognized historical character and discourage designs that are clearly out of place within rural areas. The DEIR finds that the project “would inherently change the visual character of the site and surroundings through the introduction of commercial, institutional, and residential development; the removal of over 4,000 mature oak trees; and substantial landform alteration” (DEIR at 4.11-29). The project is inconsistent with this policy.

Policy VR 2.2 requires that the review of proposed development encourage designs that emphasize native vegetation and conform grading to existing natural forms, with abundant native and/or drought-tolerant landscaping that screens buildings and parking lots and blends development with the natural landscape. The DEIR finds that “Although the project site would preserve the existing oak ridge, it would severely alter the existing native vegetation and natural landforms of the remainder of the site with the introduction of commercial, institutional, and residential development; the removal of over 4,000 mature oak trees; and substantial landform alteration” (DEIR at 4.11-29). The project is inconsistent with this policy.

B. The project would be inconsistent with Framework for Planning (Inland).

As identified in the DEIR, the project is inconsistent with Principles 1 and 2 and Policies 1 and 2 of these respective principles of Framework for Planning (note the incorrect spelling of principle). These policies guide the retention and preservation of open space and natural resources, and the rate of growth in the area (DEIR at 4.11-32).

Principle 1 relates to the preservation of open space, scenic natural beauty, and natural resources, the conservation of energy resources and the protection of agricultural land and resources. The DEIR finds that “Although the project would preserve the existing oak ridge, the project would inherently change the visual character of the site and surroundings through the introduction of commercial, institutional, and residential development; the removal of over 4,000 mature oak trees; and substantial sensitive habitat loss and landform alteration” (DEIR at 4.11-32). The project is clearly inconsistent with this.

In addition, Principle 2, Policy 1 requires that rural areas be maintained in “very low-density residential uses.” The project through its large number of residential units and commercial uses would change the character of the area and thus be inconsistent with this policy. The DEIR on page 4.11-39 and 4.11-40 is inconsistent. On page 4.11-39 the DEIR indicates that **LUP Impact 7** is Class I, yet the textual discussion regarding Aesthetics that follows, and the table on page 4.11-40, indicates it is Class II. This should be rectified. Inherent in these principals and policies is the protection of resources. We believe **LUP Impact 7** is a Class I impact.

CNPS-28
(cont'd)

CNPS-29



C. The project would be inconsistent with County of San Luis Obispo Land Use Ordinance 22.10.095 – Highway Corridor Design Standards.

The DEIR finds that “The project would inherently change the visual character of the site and surroundings through the introduction of roads, commercial, institutional, and residential development; the removal of over 4,000 mature oak trees; and substantial landform alteration within highly visible locations as seen from US 101 (DEIR at 4.11-33).

CNPS-30

D. The project would be inconsistent with the South County Inland Area Plan.

The project would be inconsistent with several guidelines, goals, and supportive goals of the South County (South) SubArea. A key guideline requires “retain land in open space in new land divisions that will preserve oak woodlands, riparian and other important biological habitats (*emphasis added*), and historic place surroundings.” (DEIR at 4.11-34). The project is clearly inconsistent with this guideline in that it retains only 3% of the Burton Mesa chaparral and 4% of the oak woodland on site as Open Space. A key supportive goal is stated as follows, in part: “Promote the protection of natural resources and encourage the following in new development proposals: a. retention of sensitive vegetation...” (DEIR at 4.11-35). The removal of over 4,000 mature oak trees and 35 acres of Burton Mesa chaparral is wholly inconsistent with this. While several of the other policy inconsistencies mentioned above are discussed under **LUP Impacts 5, 6, and 7**, it is not clear where this inconsistency is addressed. We believe this to be a Class I impact.

CNPS-31

E. The project would result in cumulative impacts associated with Policy Inconsistency.

We believe the DEIR correctly concludes “cumulative impacts associated with inconsistency with Land Use Planning Policy L-3 and goals and policies identified within the County COSE, Framework for Planning (Inland), LUO, and South County Area Plan regarding preservation and no net loss of sensitive biological resources and preservation of rural visual character would be *significant and unavoidable*. One can only conclude that the DEIR **fails to adequately establish consistency with applicable plans and policies**.

CNPS-32

F. The DEIR mischaracterizes some plan inconsistencies as consistencies or leaves out discussion altogether.

Several of the policies in the Policy Consistency section are mischaracterized as potentially consistent, with a few specifics listed below, for the reason stated.

CNPS-33



CALIFORNIA
 NATIVE PLANT SOCIETY

Policy	Intent	EIR Mischaracterization and Reason for Inconsistency
COSE Pol OS 1.1	Protect open space resources	DEIR indicates potentially consistent at 4.11-9 and 4.4-47. Inconsistent is correct. Only 17% of the SP area is protected as OS when most of the site is sensitive habitat (oak woodlands, BM chaparral, etc.) that would be lost to development.
COSE Policy OS 1.8	Maximize protection of environmentally sensitive resources	DEIR indicates potentially consistent at 4.11-9. Inconsistent is correct. The proposed OS area protects very little of the sensitive site resources. Except for Pismo Clarkia and mesa horkelia, DEIR Figure 4.4-3 & 4.4-8 shows that most sensitive species occur outside the proposed open space area and would be impacted. Stormwater basins provide minimal to no value as site resources.
COSE Policy OS 2.1	Protect, sustain, and restore open Space	DEIR indicates potentially consistent at 4.11-9. Inconsistent , as above. In addition, management by a homeowner’s association raises the possibility of future impacts.
Framework Principle 1, Pol 7	Maximize avoidance of sensitive environmental resources through site design.	DEIR indicates potentially consistent at 4.11-11. Inconsistent is correct. Considering the “large, centrally-located oak forest” (approx. 16-17 acres) to be avoidance of sensitive resources is a mockery given the prevalence of several rare plant species, >4,000 oaks, and 132 acres of sensitive habitats that will be lost due to this project (DEIR, Table 4.4-7).
Framework Principle 1, Pol 1		DEIR indicates potentially consistent at 4.11-11. Inconsistent is correct. Appears in DEIR on page 4.11-11 as potentially

CNPS-33
 (cont'd)



CALIFORNIA
 NATIVE PLANT SOCIETY

Policy	Intent	EIR Mischaracterization and Reason for Inconsistency
		consistent; on page 4.11-32 as potentially inconsistent. Clarify. We believe inconsistent is correct.
Framework Principle 2, Pol 1		DEIR indicates potentially consistent at 4.11-11. Inconsistent is correct. Appears in DEIR on page 4.11-11 as potentially consistent; on page 4.11-33 as potentially inconsistent. Clarify. We believe inconsistent is correct.
Framework Principle 2, Pol 2		Inconsistent is correct. Appears in DEIR on page 4.11-11 as potentially consistent; on page 4.11-33 as potentially inconsistent. We believe inconsistent is correct.
Title 22 County of San Luis Obispo Land Use Ordinance Section 22.98.072 (H)(8), Land Use Category Standards for the South County Sub-area, Residential Rural (RR), Dana Ranch [aka Dana Reserve]	<i>"b. Oak habitat preservation. Designation of the existing oak forest habitat for open space preservation, where limited recreational and open space uses may be allowed."</i>	Inconsistent. Restated in DEIR at 4.4-38, but consistency not addressed. The section requires conserving the existing oak forest habitat on site. Project does preserve 17 of 21.7 acres of oak forest, but it removes 75 acres of oak woodland. The Project is inconsistent for reasons noted above.
Title 22.58, LUO, Oak Woodland Ordinance	<i>"To maintain the character of the existing landscape and promote oak woodland management independent of regulation."</i>	Inconsistent. Summarized in DEIR at 4.4-37. Notably, consistency is not addressed in DEIR. The Project requests a CUP under the Ordinance. However, the Ordinance came about due to public pressure because of massive oak tree removal from Agricultural activities. It is antithetical to the intent that the Ordinance is now being used to support this request.

CNPS-33
 (cont'd)

VII. The DEIR Alternatives Analysis is Inadequate and Fails to Comply with CEQA

▼CNPS-34



CALIFORNIA
NATIVE PLANT SOCIETY

The Alternatives Section of the DEIR summarizes the Class I impacts of the project (DEIR at 5-3 through 5-6), describes alternatives considered but discarded (5-8 through 5-11), and analyses the No-project alternative and five other alternatives, defined roughly as follows:

- Alternative 1- applicant-preferred alternative, which moves neighborhood 10, the affordable housing area, out of an oak woodland area and into a more centrally located area of the site, and allows as many residential units as the Project (1,289);
- Alternative 2 – La Canada Ranch alternative, which would vastly increase the amount of open space, and allow only 535 residential units;
- Alternative 3 – Residential Rural Cluster alternative, which would include a similar amount of open space as the Project, remove the commercial development, and would allow anywhere from 78 to 390 residential units;
- Alternative 4 – Development on Non-Native Grassland alternative, which would vastly increase the amount of open space to 183 acres and include a 15% reduction in residential units to 1,100 (and also changing the ratio of RSF to RMF); and
- Alternative 5 - Gradual Transition alternative, which includes open space similar to the Project, but would include a 12% reduction in residential units to 1,135 (and also changing the ratio of RSF to RMF).

CNPS-34
(cont'd)

The above alternatives differ in their feasibility and ability to reduce Class I impacts and inconsistencies with County plans and policies.

Significantly, the DEIR rejects an alternative, the Burton Mesa chaparral avoidance alternative, because “it may be infeasible from a cost perspective” (DEIR at 5-9). This alternative would preserve 205 acres in open space, and depending on how the units are allocated, could allow up to 600-700 residential units, although the DEIR claims 815, based on 111 RSF units, and 704 RMF units. We believe this to be the Environmentally Superior Alternative, as discussed further below, along with other comments on alternatives.

A. The alternatives presented fail to optimize for affordable housing while maximizing conservation of oak woodlands (DEIR page 5-57)

The DEIR analysis concludes for Alternatives 2 through 5 that there is failure to meet the project objective of providing a diversity of housing types..., including affordable housing (DEIR at 5-32, 5-44, 5-57, 5-69.) For alternatives 2 and 3, the DEIR uses this to argue against the feasibility or acceptance of the alternative (DEIR, as referenced above). For alternatives 4 and 5, it again uses this to downplay the feasibility of the alternatives. If this objective is so important, why weren't more alternatives that would meet this objective selected and analyzed?

CNPS-35

Because (a) the proposed project is vastly inconsistent with the existing general plan, as evidenced Section VI above; and (b) in consideration of the need for affordable housing being listed as a supporting criterion for choice of certain alternatives; we suggest that another alternative should be considered. This alternative would minimize general plan inconsistencies



CALIFORNIA
NATIVE PLANT SOCIETY

and optimize housing needs, so that the same number of units could be placed on the eastern half of the project area. Rather than have four fifths of the development unaffordable, all units could be made affordable rather than the currently proposed one fifth of the development. This could be achieved through multistory apartment units or some other such accommodation.

↑
CNPS-35
(cont'd)

B. The analysis of alternatives fails to impartially determine whether a particular alternative meets or doesn't meet the project objectives.

Furthermore, it is notable that this one project objective, Objective 5 on page 5-2 of the DEIR, (“to provide a diversity of housing types...”) is used to downplay the feasibility of each of these alternatives when the same reasoning could be used in the opposite manner for Objective 9, (“To maintain the large centrally located oak woodland area as a site feature and to minimize impacts to special status plants and animals on site.”) We believe the analysis of alternatives fails to impartially determine whether a particular alternative meets or doesn't meet the project objectives. We find no language in the project description stating that the fundamental purpose of the project is to supply affordable housing. It may be an objective, but it is not a stated purpose. In fact, the project description contains no statement of purpose for the project. CEQA Section 15124(b) states “The statement of objectives should include the underlying purpose of the project and may discuss the project benefits.”

↑
CNPS-36

It is also worth noting that the DEIR in this section, 5.2.1, Project Objectives, does not use the word “basic” (DEIR, page 5-2), while numerous times in the alternatives analysis (DEIR at 5-9, 5-11, 5-32), text refers to “basic project objectives,” when there are no such identified “basic project objectives. There are just project objectives, supposedly equally weighted. (This is also the wording in Section 2.4, Project Objectives, in the Project Description (DEIR at 2-13).

C. The DEIR does not adequately analyze the Burton Mesa Chaparral Avoidance Alternative and rejects the alternative without providing substantial evidence of infeasibility (DEIR page 5-8)

This alternative results in development being placed at the eastern end of the site. (DEIR Figure 5-1, page 5-10). As currently defined in the DEIR, it would result in 205 acres being dedicated to Open Space; 61 acres would be devoted to residential uses (DEIR at 5-8). A total of 815 units, as opposed to 1,289 under the Project, would be possible. Notably, it is described as including four-story residential multi-family units, and two-story single-family units. This alternative is clearly the environmentally superior project. It appears to be rejected, among other reasons, due to the aesthetic impact of inclusion of four-story apartments or condominiums and two-story single-family homes. We find this to be without merit; a smaller 600–700-unit project (which would still be quite large for this County) could easily be designed to have lower buildings, which would eliminate the impact to aesthetics.

↑
CNPS-37
↓



CALIFORNIA
NATIVE PLANT SOCIETY

The idea that accessory dwelling units (ADUs) could elevate the impact of the project is an issue common to nearly all the considered alternatives, and not a reason to reject this Burton Mesa Chaparral Avoidance alternative.

The DEIR dismisses the Burton Mesa alternative as (1) not meeting the “most of the basic objectives” of the project, and (2) as “may be infeasible from a cost perspective (DEIR at 5-9). We reject both assertions.

This alternative keeps all the various housing types in the project proposal; it simply changes the ratios by eliminating the tract home neighborhoods that require removal of the oak woodland.

With a few minor changes, the BMC avoidance alternative could provide a greater range of housing types than the developer’s proposal. The commercial area could be slightly reduced to make room for more homes. Reviewing the project objectives, the BMC avoidance alternative can fulfill all 13 of them. To wit:

- It meets Objective 1 because it provides a mix of land uses (OS, MFR, SFR, FC, REC all shown in Fig 5-1).
- It meets Objective 2, respect for Old Town Nipomo, because village commercial can remain, simply reduced in size.
- It meets Objective 3, regarding parks and open space areas with a network of trails, because there is essentially no change from the Project, just a smaller project.
- It meets Objective 4, Rural history through arch design, since there is no change from the Project.
- It meets Objective 5, a Diversity of housing types, including affordable housing, since there is no change from the Project.
- It meets Objective 6, new employment and job training opportunities, since there is no change from the Project.
- It meets Objective 7, to enhance circulation within the Specific Plan Area and in the area, (but much of this is required *because* of the Project);
- It meets Objective 8, to integrate a network of walking, bicycling, and equestrian facilities because this remains possible in a reduced area.
- It meets Objective 9, to maintain a large centrally located oak woodland (see Figure 5-1);
- It meets Objective 10, to meet County energy requirements, since there is no change from the Project.
- It meets Objective 11, to reduce uncertainty in planning since there is no change from the Project, it’s just a smaller project.
- It meets Objective 12, for effective and efficient development of public facilities, infrastructure, and services since there is no change from Project, just a smaller project.
- It meets Objective 13, to meet the requirements of the NCSD.

↑
CNPS-37
(cont'd)

↑
CNPS-38



the footprint would be limited to the 40 acres with no violation of the Conservation and Open Space Element of the General Plan.

The DEIR identifies this residential rural cluster alternative as the environmentally superior alternative. While it can be agreed that this alternative is superior to the proposed project, it is not environmentally superior to the Burton Mesa chaparral avoidance alternative, which has been questionably eliminated, and is therefore improperly identified. Alternative 3 could result in “edge effects;” a phenomenon well known to ecologists. This effect states that the edges of a habitat are more prone to degradation from outside than the interiors areas of such habitat. The non-native habitats of the housing complex, with their introduced plants (and weeds), and dogs and cats, can quickly invade neighboring undisturbed areas. Having clusters of such housing will increase the amount of “edge”, thus making it easier for such intrusions to occur. This phenomenon has been observed again and again, and although such a development approach may leave more oak trees, it reduces the intrinsic value of the habitat and reduces that habitat to essentially its scenic character. It should be noted that this alternative is presented only in concept; much would depend on how and where the clusters were sited.

CNPS-41
(cont'd)

We therefore reject the selection of Alternative 3 as Environmentally Superior.

F. Alternative 4 also fails as the Environmentally Superior Alternative

The Burton Mesa chaparral avoidance alternative and Alternatives 2 and 4 result in the greatest amount of open space (205 acres, 173, and 183 acres, respectively) and thus preservation of biological resources. Alternative 4 would result in 1,100 units within 80 acres and is considered feasible (DEIR at 5-57). Alternative 4 is clearly better than the proposed project based on the increased acreage of protected oak woodland through a 15% decrease in housing and other land uses. However, the edge effects issue removes this alternative from consideration.

CNPS-42

We therefore conclude that a slightly revised Burton Mesa Chaparral avoidance alternative is the environmentally superior alternative, and that its rejection as infeasible is without substantial evidence.

G. Evaluate a Proposed Alternative to Reconcile the oft-stated Need for Affordable Housing found in the Alternatives Analysis of the DEIR while achieving Minimal Impacts to Natural Resources and minimizing inconsistencies with the General Plan

CNPS concurs that the DEIR shows that the Project and its Alternatives cannot minimize impacts to natural habitat to a degree that would be possible if the County's need for affordable housing were to be applied to this entire project. As noted above, CNPS, given a choice of alternatives, were it not for edge effects, would prefer Alternative 4, but we concur that this does not include sufficient affordable housing. We prefer the Burton Mesa Chaparral avoidance alternative, which has been inappropriately rejected. None of the Alternatives or the Proposed

CNPS-43



CALIFORNIA
NATIVE PLANT SOCIETY

Project sufficiently address the affordable housing crisis, despite being one of the largest housing projects proposed for the South County. We therefore strongly recommend a new alternative be considered: one that includes all units being built as affordable in a much smaller unit footprint, and that these units be concentrated at the eastern end of the project area. To best match developer objectives, as required by CEQA, we recommend that this new alternative be allowed as many residential units as originally planned but concentrated in a much smaller area by using multiple unit buildings. In this way impacts to the oaks and listed species, which are considered significant and unavoidable in the existing analysis, would be greatly reduced.

↑
CNPS-43
(cont'd)

In summary, allowing insufficient mitigation and a gross violation of the General Plan by a developer is not in the best interests of the people in the County. As CEQA states that alternatives must, to a certain degree, meet the objectives of the developer, CNPS suggests that raising densities on a smaller footprint *does* meet a major objective, while also addressing a housing need that is insufficiently addressed by the current project.

↑
CNPS-44

VIII. Conclusion

The Dana Reserve Specific Plan Project must be reduced in size. The project site contains unique resources that need not be traded for the development of housing. There are multiple significant and unavoidable (Class I) impacts of the project that should drive this reduction in size. This is one of, if not THE, largest project(s) in SLO County. There are numerous and vast inconsistencies with County policies, specifically the biological resource policies of the Conservation and Open Space Element of the General Plan. The alternatives analysis eliminates what we believe is a viable alternative. Given this, we believe the DEIR should be revised and recirculated to reflect that the Burton Mesa chaparral avoidance alternative is the environmentally superior alternative, and it must be analyzed along with other alternatives.

↑
CNPS-45

Thank you for your consideration of these comments.

Sincerely,

Melissa Mooney
President
California Native Plant Society, San Luis Obispo Chapter

9.3.5.1 Response to Letter from California Native Plant Society

Comment No.	Response
CNPS-1	<p>The comment raises concern related to the adequacy of the EIR and the size of the proposed project. Please refer to response to comments CNPS-2 through CNPS-45.</p>
CNPS-2	<p>The comment states that the DEIR does not include a clear statement of the underlying purpose of the project and states that several of the objectives are in conflict with Objective 9. Section 2.4 of the Project Description has been clarified to more clearly state the primary underlying purpose of the project, as described extensively throughout the EIR. Objective 9 has also been clarified to reflect the project's proposed permanent preservation of the large, centrally located, 17-acre oak forest as open space. This area has been characterized as "Coast live oak forest", rather than Coast live oak woodland, due to an oak canopy cover of greater than 50%. The oaks in the oak forest area are the most dense on the site, and would be preserved as open space under the Dana Reserve Specific Plan. The project is not in conflict with the stated objectives; impacts to special status plants and wildlife have been minimized to the extent feasible, while also still meeting the project's primary underlying purpose (to provide a range of housing types, including affordable housing and market-rate workforce housing).</p>
CNPS-3	<p>The comment states that the noted benefits to the County described under Section 2.4, <i>Project Objectives</i>, in Chapter 2, <i>Project Description</i>, of the EIR are questionable. Section 2.4 accurately summarizes the content of a Memorandum of Understanding the County Board of Supervisors entered into with the project applicant on January 26, 2021.</p> <p>As discussed in Chapter 2, <i>Project Description</i>, implementing the County's stated land use goals is a benefit of the project that has been identified by the County Board of Supervisors. The project's consistency with open space and biological resource policies is discussed in detail in Section 4.4, <i>Biological Resources</i>, and Section 4.11, <i>Land Use and Planning</i>. Ultimately, it will be the decision of the lead agency's decision-making body (i) whether the project is consistent with various open space and biological resource policies, (ii) whether the project is consistent with the General Plan as a whole (including its land use goals), and (iii) whether the project's economic, social, or other benefits outweigh the project's significant environmental effects. No changes to the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration.</p>
CNPS-4	<p>The comment states that the proposed open space easement is on steeper slopes and protects only 4% of the oak woodlands on site, and 3% of the Burton Mesa chaparral. Refer to response to comment CNPS-3 and Master Response MR-3. No changes to the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration.</p>
CNPS-5	<p>The comment states that trading the unique biological resources of the Nipomo Mesa for a project that may not achieve affordable housing goals is not a benefit and is not supportable.</p> <p>As discussed in Chapter 2, <i>Project Description</i>, providing for affordable housing in furtherance of the County's Housing Element, affordable housing goals, and assisting in meeting the County's Regional Housing Needs Allocation is an applicant and County stated objective for the project. As discussed in Chapter 5, <i>Alternatives Analysis</i>, several alternatives have been identified and evaluated in an effort to reduce potentially significant impacts to biological resources. Ultimately, it will be the decision of the lead agency's decision-making body whether the project's economic, social, or other benefits outweigh the project's significant environmental effects. No changes to the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration.</p>
CNPS-6	<p>The comment states that the proposed conservation easement is not functional mitigation for the significant and unavoidable impacts of the project on oak trees, oak woodlands, and oak forest habitats and is not a benefit of the project. Refer to response to comments CNPS-3 and CNPS-5 and Master Response MR-3.</p> <p>As discussed in Chapter 2, <i>Project Description</i>, the off-site dedication of an off-site open space and conservation easement is proposed as a project design feature to minimize the impacts to oak trees and oak woodland as a result of development of the Specific Plan Area. This mitigation strategy relies on Public Resources Code 21083.4, which requires a County to mitigate for loss of oak woodlands by (1) conservation, (2) replanting, though this is limited to no more than 50%, and (3) payment into the Oak Woodlands Conservation Fund. So, clearly conservation is a viable mitigation option identified in state law. Mitigation Measure BIO/mm-15.1 further defines the requirements of the conservation easement that would apply to Dana Ridge.</p> <p>Impacts to coast live oak woodland, coast live oak forest, and individual oak trees are discussed in Section 4.4, <i>Biological Resources</i>, and mitigation has been identified, which would require mitigation through a combination of conservation, enhancement, restoration, and/or recreation. Additional mitigation for impacts to these resources include preparation and implementation of an on-site tree protection plan for trees retained, a tree replacement plan, protection of on-site oak woodland resources intended to be retained and</p>

Comment No.	Response
	<p>preserved on-site, and off-site preservation. These mitigation measures would reduce impacts associated with direct and indirect impacts to coast live oak woodland, coast live oak forest, and individual oak trees. However, County COSE Policy BR 1.4 set a policy for development projects to achieve “no-net loss” of sensitive habitat acreage, values, and function and County COSE Goal BR 3 is intended to maintain the acreage of native woodlands, forests, and trees at 2008 levels. However, County COSE Implementation Strategy BR 3.3.1 implements Public Resources Code Section 21083.4, which limits the amount of replanting that may be done to mitigate for loss of oak woodland to no more than 50% and points to conservation as a viable mitigation alternative. Impacts to oak woodland and oak forest would be mitigated through permanent conservation at Dana Ridge of oak woodland at a greater than 3:1 ratio and oak forest at a 2.5:1 ratio. Therefore, of the 3,943 oak trees to be removed, the mitigation only requires the applicant to plant replacement trees for 194 of the trees being removed from habitats other than oak woodland and oak forest. The applicant will also be required to plant approximately 1,500 new trees to mitigate indirect oak tree impacts. At this level, and even with the permanent off-site conservation of oak woodland at a greater than 3:1 ratio, this is a significant net loss of oak trees and acreage of oak woodlands in the county. Because no feasible mitigation was available to mitigate these impacts to less than significant, impacts were determined to be Class I, significant and unavoidable.</p> <p>The species composition of the coast live oak woodland in the project area contains the same species characteristic of the Burton Mesa chaparral vegetation community on-site. The understory vegetation on the mitigation parcel (Dana Ridge) is distinctly different and does not support the special-status species that occur on-site. That is because the soils and elevation range of the mitigation parcel (Dana Ridge) is significantly different than the Dana Reserve project area. Therefore, it was recognized in the EIR that Dana Ridge did not provide a comparable habitat matrix compared to that provided at Dana Reserve.</p> <p>The EIR also determined that mitigating for the removal of oak trees in Burton Mesa chaparral and grassland habitats with trees planted along streets and in recreational open spaces areas, as the on-site planting plan proposes, does not sufficiently maintain the integrity of the vegetation community being lost.</p> <p>Based on these considerations and the significant loss of oaks and oak woodlands, potential impacts were identified as significant and unavoidable (Class I). As discussed in Chapter 5, <i>Alternatives Analysis</i>, several alternatives have been identified and evaluated in an effort to reduce potentially significant impacts to biological resources. Ultimately, it will be the decision of the lead agency's decision-making body whether or not to reject or approve the proposed project or an alternative. No changes to the environmental document are necessary in response to this comment.</p>
CNPS-7	<p>The comment states that allowing Burton Mesa chaparral mitigation outside SLO County, or even off the Nipomo Mesa, is inadequate mitigation. Refer to Master Response MR-3.</p>
CNPS-8	<p>The comment refers to Mitigation Measure BIO/mm-15.1 and accurately states that conservation of oak woodland is addressed in the context of the ecosystem in which it is found under this impact, rather than as an isolated species, and notes that locating suitable habitat may be impossible to either find or acquire. Refer to Master Response MR-3.</p>
CNPS-9	<p>The comment states that CNPS has for years had a policy of not recognizing off-site compensation as mitigation and states the Dana Ridge site is not appropriate for several reasons. Refer to Master Response MR-3 and response to CNPS-6.</p> <p>As discussed in Section 4.4, <i>Biological Resources</i>, a variety of mitigation measures has been identified for impacts on biological resources, including environmental monitoring; a worker environmental training program; covering excavations; erosion control; a public education program; prohibition of invasive plants; an incidental take permit; avoidance; preservation/restoration mitigation for rare plants; preconstruction surveys; special-status reptiles protection and relocation; nesting bird preconstruction surveys and nest avoidance; bat preconstruction surveys and passive relocation; badger den preconstruction survey and relocation; California red-legged frog, western pond turtle, and two-striped garter snake surveys and relocation; Conservation/enhancement/restoration for Burton Mesa chaparral; off-site mitigation for coast live oak woodland; delineation setbacks, timing constrains, and monitoring for riparian areas and aquatic habitats; an on-site tree protection plan for trees retained; a tree replacement plan; protection for on-site oak woodland resources; off-site preservation for oak woodlands; and oak tree monitoring. Impacts for which feasible mitigation was not sufficient to reduce the severity to less than significant have been classified as significant and unavoidable (Class I). As such, no changes to the environmental document are necessary in response to this comment.</p>
CNPS-10	<p>The comment objects to the use of an oak woodlands management plan as an instrument to avoid the intent of the County Oak Ordinance to conserve oak trees with the no-net-loss policy. Refer to Master Response MR-3 and response to CNPS-6.</p>
CNPS-11	<p>The comment suggests that the project should protect the existing oak woodland by designing a smaller project. Refer to Master Response MR-3.</p> <p>As discussed in Chapter 5, <i>Alternatives Analysis</i>, all of the alternatives evaluated would result in reduced impacts to oak trees compared to the proposed project. Ultimately, it will be the decision of the lead agency's decision-making body whether or not to reject or approve the proposed project or an alternative. No changes</p>

Comment No.	Response
	<p>to the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration.</p>
CNPS-12	<p>The comment states that the impacts to Pismo clarkia are significant and unavoidable (Class I) and requests clarity on the proposed area of disturbance around Collector B.</p> <p>Direct and indirect impacts on Pismo clarkia are considered significant and mitigation is required to reduce project impacts. The project applicant must obtain all necessary approvals and concurrence with the CDFW for the take of a state-listed plant. Mitigation shall be required to reduce project impacts through the permanent conservation of habitat occupied by Pismo clarkia and expansion of Pismo clarkia extent to mitigate for direct impacts. Additional on-site avoidance measures for Pismo clarkia include habitat protection, worker training, fencing, biological monitoring, weed management, and avoidance of mowing/grazing during the plant's annual growing season (February–July). No net loss of Pismo clarkia on-site would occur. The unavoidable impact to 0.02 acre of occupied Pismo clarkia habitat will be mitigated at a 3:1 ratio with on-site restoration and habitat enhancement to expand the extent of Pismo clarkia present in preserved open space. Mitigation Measures BIO/mm-2.1 through BIO/mm-2.3 are consistent with County COSE Policies BR 2.6.2 and BR 2.6.3 (Development Impacts to Listed Species), which include the use of a habitat preservation ratio of a minimum of 2:1 to avoid significant cumulative loss of valuable habitats and obtaining easements to protect habitat. With implementation of Mitigation Measures BIO/mm-1.1 through BIO/mm-1.6 and BIO/mm-2.1 through BIO/mm-2.3, potential impacts to Pismo clarkia and their habitat would be less than significant with mitigation (Class II).</p> <p>Detailed design of Collector B has not been completed at this phase of the project; the typical width for Collector B is shown in Figure 2-15 in Chapter 2, <i>Project Description</i>.</p> <p>No changes to the environmental document are necessary in response to this comment.</p>
CNPS-13	<p>The comment raises concern related to the protection of Mesa horkelia, Nipomo Mesa ceanothus, and sand mesa manzanita.</p> <p>As discussed in Section 4.4, <i>Biological Resources</i>, approximately 7,553 mesa horkelia rosettes were detected across the project area during the 2017 to 2020 surveys, predominantly within or near coast live oak woodland. Plants were frequently encountered along the dripline of oak tree canopy (see Figures 4.4-3 and 4.4-4; EIR Appendix E). Approximately 50 Nipomo Mesa ceanothus shrubs were detected during the 2017 to 2020 surveys (see Figures 4.4-3 and 4.4-4; EIR Appendix E). Individuals predominantly occur in the northeastern portion of the project area, and many are less than 4 feet tall. Sandy soil in the project area's chaparral and woodland habitats is highly suitable for this species. A portion of a known record (CNDDDB #16) of sand mesa manzanita occurs in the project area. Within the project area, 324 sand mesa manzanitas were detected during the 2017 to 2020 surveys (see Figures 4.4-3 and 4.4-4; EIR Appendix E). Individuals are scattered across the project area and the majority are less than 2 feet tall. Stumps appear to have been previously burned or masticated and are regenerating from underground root burls. No changes to the environmental document are necessary in response to this comment.</p>
CNPS-14	<p>The comment states that the project is inconsistent with the General Plan's Goal BR-1 in the Conservation and Open Space Element and raises concern regarding overwintering and nesting habitat associated with loss of oak trees at the site.</p> <p>As discussed in Section 4.4, <i>Biological Resources</i>, the project would be potentially inconsistent with Goal BR 1. The project would result in significant impacts to special-status plant species and sensitive natural communities that would constitute a net loss of species and habitat diversity in the county. Therefore, the impact determination in the EIR is consistent with the intent of this comment.</p> <p>The project's potential impacts on nesting birds, including birds protected under the Migratory Bird Treaty Act, are evaluated under BIO Impact 7. BIO Impact 7 evaluates the loss of nesting and foraging habitat in oak, chaparral, and grassland habitats. This impact would be reduced to less than significant through implementation of Mitigation Measures BIO/mm-1.1 through BIO/mm-1.6, BIO/mm-7.1, BIO/mm-14.1, BIO/mm-15.1, and BIO/mm-18.4. No changes to the environmental document are necessary in response to this comment. Ultimately, it will be the decision of the lead agency's decision-making body (i) whether the project is consistent with various open space and biological resource policies, (ii) whether the project is consistent with the General Plan as a whole (including its land use goals), and (iii) whether the project's economic, social, or other benefits outweigh the project's significant environmental effects.</p>
CNPS-15	<p>The comment asserts that impacts to nesting birds are significant and unavoidable.</p> <p>As discussed in Section 4.4, <i>Biological Resources</i>, impacts to special-status birds, raptors, and nesting birds would be less than significant with implementation of Mitigation Measures Mitigation Measures BIO/mm-1.1 through BIO/mm-1.6, BIO/mm-7.1, BIO/mm-14.1, BIO/mm-15.1, and BIO/mm-18.4. Mitigation Measure BIO/mm-7.1 would require nesting bird preconstruction surveys and nest avoidance to ensure direct impacts to nesting birds are avoided. No changes to the environmental document are necessary in response to this comment.</p>
CNPS-16	<p>The comment asserts that impacts to American badger are also significant and unavoidable.</p>

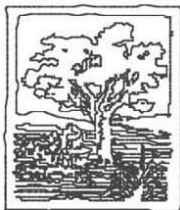
Comment No.	Response
	<p>American badger occurs in the project area. Project activities, including grading and other excavation work, could result in impacts to American badger adults or young or disturbance of natal dens and abandonment by adult badgers. During the winter, badgers do not truly hibernate but are inactive and asleep in their dens for several days at a time. Because they can be torpid during the winter, they are vulnerable to disturbances that may collapse their dens before they rouse and emerge. Therefore, surveys are required to be conducted for badger dens throughout the year. With implementation of Mitigation Measures BIO/mm-1.1 through BIO/mm-1.6, BIO/mm-9.1, BIO/mm-14.1, BIO/mm-15.1, and BIO/mm-18.4, impacts to American badger would be less than significant with mitigation (Class II). No changes to the environmental document are necessary in response to this comment.</p>
CNPS-17	<p>The comment states that the DEIR fails to address the project's dependence on water imported by Nipomo Community Services District which should otherwise have been used to counter continued decline of groundwater storage in the area. Refer to Master Response MR-1.</p>
CNPS-18	<p>The comment states it is extremely unlikely the Southland Wastewater Treatment Facility will recharge the production aquifers beneath the Mesa, and more likely returning the water to the Santa Maria area. Refer to Master Response MR-1.</p>
CNPS-19	<p>The comment raises concern related to groundwater recharge and states the conclusion of "potentially consistent" cannot be made for General Plan Policy BR 4.1. Refer to Master Response MR-1.</p> <p>Ultimately, it is a function of the local decision-making body (San Luis Obispo County Board of Supervisors) to make a determination regarding the project's consistency with applicable plans and policies. Therefore, the EIR preparers completed a consistency analysis of the proposed project, but only identified preliminary consistency findings (e.g., potentially consistent or potentially inconsistent). It should also be noted that perfect conformity with every general plan policy is neither achievable or required (<i>Families Unafraid to Uphold Rural El Dorado County v. El Dorado County Board of Supervisors [1998] 62 Cal.App.4th 1332, 1341-1342</i>). The decision makers are required to evaluate the project's consistency with the General Plan as a whole and a project should only be found inconsistent with the General Plan as a whole when it conflicts with a general plan policy that is fundamental, mandatory, and clear.</p> <p>As shown in the preliminary grading scheme for the site, there are four proposed 8-foot maximum ponded depth stormwater basins located at the northeast, southwest, and west/northwest corners of the Specific Plan Area. In addition, multiple shallow, 2-foot maximum ponded depth stormwater basins are proposed throughout the eastern half of the Specific Plan Area. All stormwater basins would be designed to meet County Public Improvement Standards. Each subsystem of basins would be sized to accommodate the remaining runoff produced by the additional impervious areas within each respective drainage management area and neighborhood development. Storm drain inlets/culverts would also be added to connect subsystems of basins where appropriate. Overflow structures, culverts, weirs, or other devices would be added and sized to meet discharge flows for both the County requirements and Central Coast Regional Water Quality Control Board (RWQCB) post-construction stormwater requirements. Each development area within the Specific Plan Area would be responsible for designing and incorporating its own stormwater treatment infrastructure within the individual DRSP neighborhoods and/or commercial area. Stormwater treatment options to be utilized within the Specific Plan Area are found in Appendix A (see Appendix A of this EIR). The project would include LID and SWPPP requirements to protect streams and riparian vegetation at the location of off-site improvements; therefore, the project is considered to be potentially consistent with the intent of Policy BR 4.1. No changes to the environmental document are necessary in response to this comment.</p>
CNPS-20	<p>The comment raises concern related to pollutant release and states that the conclusion of "Potentially Consistent" for General Plan Policy BR 4.4 is speculative. Refer to Master Response MR-1 and CNPS-19.</p> <p>The project would include County and RWQCB required LID and SWPPP requirements to reduce nonpoint source pollution at the location of off-site improvements; therefore, the project is considered to be potentially consistent with the intent of Policy BR 4.4. No changes to the environmental document are necessary in response to this comment.</p>
CNPS-21	<p>The comment raises concern related to groundwater recharge and suggests the project is inconsistent with General Plan Policy SL 2.1. Refer to Master Response MR-1 and CNPS-19.</p> <p>The intent of Policy SL 2.1 is to protect watersheds, aquifer-recharge areas, and natural drainage systems. Future development within the Specific Plan would be required to prepare and submit a drainage plan, which would direct stormwater into the proposed on-site storm drain systems and prevent off-site runoff. Implementation of the drainage plan would ensure that stormwater runoff is controlled within each development area, consistent with this policy. No changes to the environmental document are necessary in response to this comment.</p>
CNPS-22	<p>The comment suggests the project is inconsistent with General Plan Policy WR 1.9. Refer to Master Response MR-1 and CNPS-19.</p> <p>The intent of General Plan Policy WR 1.9 is to promote infill development, discourage urban sprawl, and conserve water resources. The project would be annexed into the NCSD service area to facilitate NCSD's</p>

Comment No.	Response
	provision of water and wastewater services. The project would not create new mutual or private water companies. No changes to the environmental document are necessary in response to this comment.
CNPS-23	The comment suggests the project is inconsistent with General Plan Policy WR 1.13. Refer to Master Response MR-1 and CNPS-19.
CNPS-24	The comment raises concern related to groundwater resources and suggests the project is inconsistent with General Plan Policy WR 1.14. Refer to Master Response MR-1 and CNPS-19.
CNPS-25	<p>The comment suggests the project is inconsistent with General Plan Policy WR 3.3. Refer to Master Response MR-1 and CNPS-19.</p> <p>The project would include County and RWQCB required LID and SWPPP requirements to reduce nonpoint source pollution at the location of off-site improvements. Future development within the Specific Plan would be required to comply with applicable requirements of the project-specific SWPPP, PCR 2, and operational source control BMPs (as applicable) to detain, retain, and treat polluted stormwater runoff; therefore, the project is considered to be potentially consistent with the intent of Policy WR 3.3. No changes to the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration.</p>
CNPS-26	The comment raises concern related to groundwater recharge and consistency with relevant policies. Refer to Master Response MR-1 and response to comments CNPS-19 through CNPS-25.
CNPS-27	<p>The comment summarizes the significant and unavoidable (Class I) impacts identified in the DEIR for air quality, cumulative air quality, greenhouse gas emissions, and transportation.</p> <p>No changes to the environmental document are necessary in response to this comment.</p>
CNPS-28	<p>The comment states that the project would be inconsistent with Goal BR 1; Policies BR 1.2, 2.4, 1.9, and 2.6; Goal BR 3, Policies 3.1, 3.2, and 3.3; visual resources Goal 2, and Policies VR 2.1 and 2.2 and concurs with the findings of the DEIR.</p> <p>No changes to the environmental document are necessary in response to this comment. It should be noted that perfect conformity with every general plan policy is neither achievable or required (<i>Families Unafraid to Uphold Rural El Dorado County v. El Dorado County Board of Supervisors [1998] 62 Cal.App.4th 1332, 1341-1342</i>). The decision makers are required to evaluate the project's consistency with the General Plan as a whole and a project should only be found inconsistent with the General Plan as a whole when it conflicts with a general plan policy that is fundamental, mandatory, and clear.</p>
CNPS-29	<p>The comment states agreement with the findings in the DEIR related to the project's potential inconsistency with Framework for Planning (Inland) Principles 1 and 2 and Policies 1 and 2. The comment also identifies an inconsistency in impact determinations identified for LUP Impact 7 in Section 4.11, <i>Land Use and Planning</i>, and states they believe LUP Impact 7 is a Class I impact. Refer to response to CNPS-19.</p> <p>LUP Impact 7 identifies a Class II significant but mitigable impact related to potential inconsistencies with policies for the protection of existing character and visual resources, and substantial evidence regarding the character and visibility of the site is provided to support a Class II significant but mitigable impact determination as is reflected in the discussion under LUP Impact 7 and residual impact analysis. The typo in the heading of LUP Impact 7 has been corrected to reflect a Class II impact, consistent with the analysis in that section and the <i>Executive Summary</i>. Ultimately, it will be the decision of the lead agency's decision-making body (i) whether the project is consistent with various open space and biological resource policies, (ii) whether the project is consistent with the General Plan as a whole (including its land use goals), and (iii) whether the project's economic, social, or other benefits outweigh the project's significant environmental effects.</p>
CNPS-30	<p>The comment states that the project would be inconsistent with County of San Luis Obispo Land Use Ordinance 22.10.095 Highway Corridor Design Standards. Refer to response to comment CNPS-19.</p> <p>This is consistent with the finding in Section 4.11, <i>Land Use and Planning</i>. No changes to the environmental document are necessary in response to this comment.</p>
CNPS-31	<p>The comment states that the project would be inconsistent with the policies included in the South County Inland Area Plan related to retaining open space. Refer to response to comment CNPS-19. As discussed in Table 4.11-4 (Policies for which the Project would be Potentially inconsistent With) of Section 4.11, <i>Land Use and Planning</i>, the proposed project is considered to be potentially inconsistent with this guideline. Although the project would preserve the existing oak ridge, the project would inherently change the visual character of the site and surroundings through the introduction of commercial, institutional, and residential development; the removal of approximately 3,943 mature oak trees; and substantial sensitive habitat loss and landform alteration. However, the project includes proposed legislative actions that would eliminate inconsistencies with the South County Area Plan. No changes to the environmental document are necessary in response to this comment.</p>

Comment No.	Response
CNPS-32	<p>The comment agrees with the conclusion in the DEIR that "cumulative impacts associated with inconsistency with Land Use Planning Policy L-3 and goals and policies identified within the County COSE, Framework for Planning (Inland), LUO, and South County Area Plan regarding preservation and no net loss of sensitive biological resources and preservation of rural visual character would be significant and unavoidable." Refer to response to comment CNPS-19.</p> <p>No changes in the environmental document are necessary in response to this comment.</p>
CNPS-33	<p>The comment challenges several "potentially consistent" determinations in the policy consistency section. Each of the policy impact determinations is substantiated with substantial evidence to support the preliminary impact determination. Refer to response to comment CNPS-19.</p>
CNPS-34	<p>The comment summarizes the alternatives analyzed in Chapter 5, <i>Alternatives Analysis</i>, and asserts that the rejected Burton Mesa chaparral avoidance alternative is the environmentally superior alternative. Refer to Master Response MR-3 and response to comment NCSD-52.</p> <p>As discussed in Chapter 5, under the Burton Mesa chaparral avoidance alternative, the project would not provide a diversity of housing types, including affordable homes, and would not connect on-site residential neighborhoods to the community through development of pedestrian, bicycle, and equestrian trails via Collector B and an on-site trail system in the majority of the Specific Plan Area. Therefore, the Burton Mesa chaparral avoidance alternative would not meet most of the basic project objectives. This alternative would also likely be infeasible from a cost perspective. Based on the substantially reduced project footprint, increased density, and more compact design, the Burton Mesa chaparral avoidance alternative would accommodate an increased number of multi-family units and a decrease in single-family units compared to the proposed project. Single-family units would be reduced from 831 to 111 and multi-family units would be increased from 458 units to 704 units. This does not meet the basic project objective of providing a range of housing types, including affordable housing and market-rate workforce housing. Further, the reduced number of units and utility connections makes expansion of NCSD and roadway infrastructure to serve the site more expensive per unit, decreasing the feasibility of a multi-family residentially focused alternative being feasible and increasing the challenges of providing affordable housing within the Specific Plan Area. Since this alternative does not meet the basic project objectives, is likely infeasible, and has the potential to generate new potentially significant impacts, this alternative was eliminated, consistent with State CEQA Guidelines Section 15126.6(c). No changes to the environmental document are necessary in response to this comment.</p>
CNPS-35	<p>The comment states that the alternatives presented fail to optimize for affordable housing while maximizing conservation of oak woodlands. Refer to Master Response MR-3.</p> <p>Refer to the discussion under Section 5.4.5 of the EIR, which evaluated Alternative 3: Residential Rural Cluster Subdivision and Alternative 4: Development on Non-Native Grassland, both of which would reduce impacts on oak woodlands. No changes to the environmental document are necessary in response to this comment.</p>
CNPS-36	<p>The comment states the analysis of alternatives fails to impartially determine whether a particular alternative meets or doesn't meet the project objectives. Section 2.4 of the Project Description has been clarified to more clearly state the primary underlying purpose of the project, as described extensively throughout the EIR. The Alternatives Analysis evaluated a range of feasible alternatives, but only those that met the project's primary underlying purpose (to provide a range of housing types, including affordable housing and market-rate workforce housing) were evaluated in detail.</p>
CNPS-37	<p>The comment states that the DEIR does not adequately analyze the Burton Mesa chaparral avoidance alternative and rejects the alternative without providing substantial evidence of infeasibility. As described in Section 5.3.1 of the EIR, due to the substantially reduced number of units under the Burton Mesa Chaparral Avoidance Alternative, the expansion of NCSD water and wastewater infrastructure, as well as transportation and utility infrastructure, would be cost prohibitive. This would be true of a housing project with no affordability goals and is more severely true of the proposed project, the primary objective of which is to provide a range of housing, including affordable and market-rate workforce housing. No changes to the environmental document are necessary in response to this comment.</p>
CNPS-38	<p>The comment suggests that the Burton Mesa chaparral avoidance alternative could achieve all 13 of the stated project objectives. Refer to responses to comments CNPS-34 through CNPS-37, above.</p> <p>Development at the level that would be allowed under the Burton Mesa Chaparral Avoidance Alternative would not meet the project's goals for affordable housing, both deed-restricted affordable housing and market-rate workforce housing.</p> <p>Ultimately, it will be the decision of the lead agency's decision-making body whether or not to reject or approve the proposed project or an alternative. No changes to the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration.</p>

Comment No.	Response
CNPS-39	The comment states that no substantial evidence is provided to show why the Burton Mesa chaparral avoidance alternative is not feasible and requests that more detailed analysis of this alternative be made. Refer to responses to comments CNPS-34 through CNPS-38, above.
CNPS-40	The comment states the DEIR does not adequately analyze the Residential Rural Development Alternative. Refer to responses to comments CNPS-34 through CNPS-38, above. Like the Burton Mesa Chaparral Avoidance Alternative, the Residential Rural Development Alternative was determined to be inconsistent with the project's basic underlying purpose, which is to provide a range of housing, including affordable housing and market-rate workforce housing. A Residential Rural Cluster Subdivision Alternative was evaluated as Alternative 3 in the EIR, and ultimately determined to be the Environmentally Superior Alternative.
CNPS-41	The comment advocates for the Burton Mesa Chaparral Avoidance Alternative, consistent with prior comments and states the DEIR does not adequately analyze the Residential Rural Cluster Subdivision Alternative. Refer to responses to comments CNPS-34 through CNPS-40, above. The analysis of Alternative 3: Residential Rural Cluster Subdivision assumes this alternative has the potential to facilitate a two- to 10-lot cluster subdivision on each 5-acre Residential Rural (RR) parcel, resulting in the construction of 78 to 390 single-family residential units, in addition to a proportionate number of ADUs. As described in the EIR, while the number and extent of needed improvements may be reduced due to this alternative's reduced demand for services and the location of clustered development, the cost of implementing the needed infrastructure improvements would be very high to serve a relatively low number of units and uses. Assuming it is feasible to construct, it would not provide a mix of housing types and affordability levels at the same level as the proposed project.
CNPS-42	The comment states Alternative 4 also fails as the Environmentally Superior Alternative and concludes that a slightly revised Burton Mesa Chaparral avoidance alternative should be the environmentally superior alternative. Refer to responses to comments CNPS-34 through CNPS-41, above.
CNPS-43	The comment advocates for a proposed alternative to reconcile the oft-stated need for affordable housing while achieving minimal impacts to natural resources and minimizing inconsistencies with the General Plan by proposing 100% affordable units in the eastern portion of the site. This alternative is similar to Alternative 4: Development in Non-Native Grassland, which primarily exists on the eastern portion of the site. Development on grassland in the western portion of the site would be infeasible due to the cost of expanding water, wastewater, and transportation infrastructure to serve the more limited areas of non-native grassland. A 100% affordable project would not generate the revenue needed to facilitate construction of necessary transportation, water, or wastewater infrastructure to serve the site. Collectors A and B each have an associated cost over \$10 million to construct. NCS connection fees for the project are estimated at \$40 million. These fees would presumably be reduced with a reduced project but cost of construction the facilities needed to serve development would not. These costs would be proportionately increased across the fewer number of units. Refer to responses to comments CNPS-34 through CNPS-41, above.
CNPS-44	The comment advocates for a higher density project with a smaller footprint, consistent with Alternatives 3 and 4 in the EIR. Refer to responses to comments CNPS-34 through CNPS-41, above.
CNPS-45	The comment summarizes and restates previous comments. Refer to responses to comments CNPS-34 through CNPS-41, above.

9.3.6 Nipomo Native Garden



Nipomo Native Garden

July 30, 2022

To the County Planning Department
Re: The Dana Reserve Development

As president of the board for the Nipomo Native Garden, I feel compelled to respond to the EIR for the Dana Reserve Development. Our organization has spent 30 years trying to maintain and develop 12 acres of county park land with the exact habitat that is going to be destroyed by this project. I am not a biologist so I will leave the technical aspects of habitat destruction to the California Native Plant Society. But some of my concerns are these:

HABITAT

The Burton Mesa Chaparral plant community is very rare, being found only in northern Santa Barbara and southern San Luis Obispo counties. There used to be a lot more acres of it before the development of the last phase of Black Lake Golf Course. The corner of Willow Rd and Pomeroy used to be called Ceanothus corner back then because of the beautiful spring display of *Ceanothus impressus v. nipomoensis*. As noted in the EIR, the plants in this community are finicky as to their living requirements. They have specialized niches that they inhabit. You can't just transplant them any old place and expect them to survive. And they are interesting and important plants to native wildlife.

-The EIR admits that there is no way to preserve this habitat in any decent way with the size and scope of this project. So the band-aid approach is recommended: Use California Live Oak trees for street trees and visual barriers. Don't worry about trying to preserve much of the Burton Chaparral because they are plants that are rejuvenated by fire and we can't really do controlled burns in such a densely planted neighborhood. Instead, the mitigation site will be off on some remote property far away from the main part of Nipomo where many of these plants will not survive since the area they will be planted in will not meet their finicky requirements. This does not seem like the best way to preserve this delicate ecosystem.

RURAL CHARACTER OF NIPOMO

One of the goals of this project (supposedly) is to retain the rural character of Nipomo. But the main indicator of our "rural character" seems to be whether or not you have a view of the Temetatte Range. Plunking 1200 housing units right on the edge of the urban reserve line seems like a guaranteed way to destroy the rural character of our community. There are many

NNG-1

NNG-2

smaller in-fill projects that could be built around the area that would not have such a huge visual impact.

↑ NNG-2
(cont'd)

TRAFFIC CIRCULATION

If you live in Nipomo, you know that the Tefft St. corridor is the center of the community. Most of the services available are on this street or right off it. It is extremely congested at certain times of the day with solid lines of traffic moving slowly in both directions. In addition, Hwy 101 during the late afternoon backs up almost to Los Berros and moves very slowly to and through the Tefft St interchange. There never seems to be any particular reason---no accidents, etc--- there are just too many cars trying to navigate the two-lane highway. Now think of 1200 more houses feeding into this area, built right against the urban reserve line and the freeway. Traffic will be at a standstill for certain times of the day. The quality of life for everyone will diminish significantly. Is this what passes for urban planning these days?

↑ NNG-3

WATER

This project is touted as being a win-win since it will lower the water bills for the people who are serviced by the NCS D since they contracted with Santa Maria to buy a certain amount of water each year. However, the extra water that Santa Maria has is primarily from the State Water Project which people have advertised as a reliable source of water. But as we have seen this year, when drought hits all parts of California, there is not enough water to go around. We do not know how long this drought will last or whether we will ever get back to average rainfalls in the near future. But it seems unwise to depend on a source that already announced that it was having trouble supplying all of its customers.

↑ NNG-4

When the NCS D decided to get supplemental water from Santa Maria (after the people of Nipomo had voted it down twice!!), it was sold to the community as a way to replenish our over-drafted aquifer. The NCS D said that the water would only be used for this purpose and that it wouldn't result in more large-scale development in Nipomo. Yet here we are with everyone gung-ho to do just that. What happens if the drought lasts another 10 years? Where will we be then?

PLANNED COMMUNITY CONCEPT

When the 1200 house project at Trilogy was approved, everyone was excited by the idea that it would be a self-sustaining community with its own services, jobs and a school. More additional houses keep being built at Trilogy and none of these amenities happened. The school got ditched first. The business park never took off, and even though the commercial area has signs requesting businesses to develop there, the only thing that has happened so far, after all these years, is a Dignity Health blood drawing facility. Everyone who lives there has to go to the Tefft Street corridor, or into Santa Maria or Arroyo Grande to do their errands. Will the same thing happen with the Dana Reserve? Why have these closed off private communities? Wouldn't it be better to have smaller projects spread out over the whole community so that no one area has to bear the burden of increased density and traffic?

↑ NNG-5

CONCLUSION

I know that there is a need for more workforce housing. It is appalling to me how the price of housing has escalated in the last 10 years. But are these large-scale developments the only way

↑ NNG-6

to get some more reasonable units? Is there a way to work with People's Self-Help Housing or other organizations to develop projects that are only work-force housing and not this attempt to do everything in one big-scale project? Could ADU's play a larger role in developing additional units if some of the onerous costs and requirements were lessened?

↑
NNG-6
(cont'd)

I know that those of you in the planning community have a much better understanding than I do of the issues. But I do know that this project is going to irrevocably change the character and feel of Nipomo, and not in a good way. It will also lead inevitably to more large-scale development.

↑
NNG-7

Please consider carefully the full impacts of this development and do not approve it as it is currently configured.

Sincerely,

Cynthia Jelinek
President, Nipomo Native Garden

9.3.6.1 Response to Letter from Nipomo Native Garden

Comment No.	Response
NNG-1	<p>The comment states the off-site mitigation property does not seem like the best way to preserve the delicate ecosystem of Burton Mesa chaparral. Refer to Master Response MR-3.</p> <p>As discussed under BIO Impact 14 in Section 4.4, <i>Biological Resources</i>, both on-site and off-site mitigation opportunities were evaluated to reduce potential impacts to Burton Mesa chaparral. Under the current project design, on-site mitigation opportunities are limited. In addition, Burton Mesa chaparral is a fire prone and fire dependent natural community, achieving its highest species diversity following fires (CDFG 2007). Unfortunately, incorporating fire, in the form of controlled burns, as a habitat management tool to maintain species diversity is challenging in an urban setting. Given this management constraint, off-site conservation of Burton Mesa chaparral would be the best option to offset significant impacts. However, due to the limited range of this vegetation type and the limited availability of off-site mitigation parcels, implementing off-site mitigation may also not be feasible. Due to the lack of off-site mitigation opportunities, the applicant has reevaluated potential on-site mitigation options. One proposed plan would reestablish small patches of Burton Mesa chaparral in native gardens around the periphery of the proposed development (See EIR Appendix E). These smaller isolated patches would not provide the same habitat value as what is currently on-site, even when considering the degraded nature of the natural community. This is because it is the combined habitat matrix of Burton Mesa chaparral, coast live oak woodland, and California perennial grassland that supports the special-status plant and wildlife species that are present. If plants established in native gardens are propagated from material and seed salvaged on site, then they would be beneficial in maintaining the genetic diversity of the rare plant species that comprise the constituent elements of Burton Mesa chaparral. Because offsite mitigation parcels are currently unavailable and on-site mitigation options do not provide the same habitat value as the habitat being removed, potential impacts would be significant and unavoidable.</p> <p>Several alternatives were evaluated in Chapter 5, <i>Alternatives Analysis</i>, which would include reduced footprints and would result in reduced impacts to Burton Mesa chaparral compared to the proposed project. Ultimately, it will be the decision of the lead agency's decision-making body whether or not to reject or approve the proposed project or an alternative. No changes to the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration.</p>
NNG-2	<p>The comment states that the project will destroy the rural character of the community.</p> <p>As discussed in Section 4.1, <i>Aesthetics</i>, the Temettate Ridge approximately 3 miles east of US 101 is visually dominant and provides a high-quality scenic backdrop for much of the community. The County's COSE identifies the Temettate Ridge east of Nipomo and US 101 between Arroyo Grande and State Route (SR) 166 as "Areas Subject to Scenic Protection Standards." The visual analysis included in Section 4.1 was prepared by a landscape architect and concluded that implementation of the DRSP project would have little to no effect on existing public views of the Temettate Ridge and the scenic vista to the east. Because of the extensive mature tree cover and topography throughout the northern, southern, and western portions of the site, many of the potential views to the eastern hills are already substantially blocked as seen from adjacent streets and neighborhoods. Due to view angle and elevation, views to the Temettate Ridge from Nipomo Community Park south of the Specific Plan Area would not be affected by implementation of the proposed project. As seen from important commercial corridors, such as US 101, Tefft Street, and North and South Frontage Roads, views of the scenic hills to the east would not be affected since the project site is oriented in the opposite viewing direction, generally to the west.</p> <p>Within the project site itself, the existing oak-covered ridge contributes to the scenic vista as seen from much of the surrounding area. The Specific Plan proposes to save that landform and associated trees, which would preserve the ridge's benefit as part of the scenic vista.</p> <p>Although portions of the Specific Plan Area would be visible from areas in and around the community, the development would not visually encroach onto the most scenic, character-defining elements of the scenic backdrop to the east. From many viewpoints, due primarily to viewing distance and the associated view angle, even the larger and more dense part of the development would not block views of the Temettate Ridge to the east. From many locations, where visible, buildout per the proposed Specific Plan would be visually subordinate to the overall scenic quality of the hillside community backdrop.</p> <p>Although the Specific Plan Area is planned for development in the County's existing General Plan, and the project would preserve the existing oak ridge, the project would inherently change the visual character of the site and surroundings through the introduction of commercial, institutional, and residential development; the removal of approximately 3,943 mature oak trees; and substantial sensitive habitat loss and landform alteration. Mitigation Measure AES/mm-3.1 would require a visual screening zone to be established along the length of the project adjacent to the utility easement and US 101, for the purpose of reducing visibility of the development and minimizing visual impacts to the vegetated visual character of the site and its surroundings as seen from the highway. No changes to the environmental document are necessary in response to this comment.</p>

Comment No.	Response
NNG-3	<p>The comment raises concern related to an increase in traffic along the Tefft Street corridor and US 101, which already experience daily congestion.</p> <p>As discussed in Section 4.17, <i>Transportation</i>, buildout of the DRSP would require the payment of development fees by each prospective developer, including fair-share contributions, for identified off-site transportation improvements at the Tefft Street/US 101 interchange and North Frontage Road. The County's existing Road Improvement Fee Ordinance No. 2379 (1988) allows the County to collect fees to fund road construction projects that are needed to mitigate cumulative traffic impacts. Buildout of the Specific Plan Area would exceed the County VMT thresholds and therefore would not be consistent with State CEQA Guidelines Section 15064.3(b). VMT per employee would be incrementally reduced compared to existing conditions; however, the project-related increase in residential VMT per capita and overall VMT would exceed VMT thresholds. With implementation of feasible mitigation measures, including Mitigation Measure TR/mm-3.1, VMT impacts of the phased buildout of the Specific Plan Area would remain significant and unavoidable with mitigation (Class I). No changes to the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration.</p>
NNG-4	<p>The comment raises concern related to the reliability of the State Water Project and the NCS D water supply. Refer to Master Response MR-1.</p>
NNG-5	<p>The comment refers to the Trilogy project and the project features that haven't been developed and suggests that smaller projects throughout the community could be more beneficial than the proposed project. The DRSP would allow for the future phased development of residential uses, village and flex commercial uses (including a hotel, educational/training facilities, and retail/light industrial uses), open space, trails, and a public neighborhood park within the approximately 288-acre Specific Plan Area. The DRSP would also provide a phasing/implementation plan and describe the public facility financing mechanisms available for the ongoing maintenance of public and private improvements required for the DRSP. The DRSP includes a preliminary phasing plan that identifies three phases for initial site preparation and infrastructure establishment, as shown on Figure 2-24 and described in Chapter 2, <i>Project Description</i>. Infrastructure for Phase 1, which includes the Flex Commercial and Village Commercial areas, would be built out first. The identified phasing represents a reasonable approach to extending services and infrastructure throughout the Specific Plan Area. In some cases, property owners may wish to develop in phases concurrently or in a different order than anticipated in Figure 2-24. This would be permitted, provided that all public improvements needed to support proposed development are completed, circulation is provided for secondary access, and the change in phased development would not require additional environmental review. No changes to the environmental document are necessary in response to this comment.</p>
NNG-6	<p>The comment suggests developing projects that are only work-force housing and increasing the role of ADUs in developing additional units. A reduced project would not generate the revenue needed to facilitate construction of necessary transportation, water, or wastewater infrastructure to serve the site. Collectors A and B each have an associated cost over \$10 million to construct. NCS D connection fees for the project are estimated at \$40 million. These fees would presumably be reduced with a reduced project but cost of construction the facilities needed to serve development would not. These costs would be proportionately increased across the fewer number of units. Refer to responses to comments CNPS-34 through CNPS-41, above.</p>
NNG-7	<p>The comment raises concern related to neighborhood compatibility and requests that the decision-making body deny the project as it is currently configured. Refer to response to comment NNG-2.</p> <p>Ultimately, it will be the decision of the lead agency's decision-making body whether or not to reject or approve the proposed project or an alternative. No changes to the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration.</p>

9.3.7 Californians for Homeownership



CALIFORNIANS FOR
HOMEOWNERSHIP

MATTHEW GELFAND, COUNSEL
MATT@CAFORHOMES.ORG
TEL: (213) 739-8206

August 1, 2022

VIA EMAIL

Jennifer Guetschow
County of San Luis Obispo
976 Osos Street, Room 300
San Luis Obispo, CA 93408
Email: jguetschow@co.slo.ca.us

RE: Dana Reserve Specific Plan DEIR

Dear Ms. Guetschow:

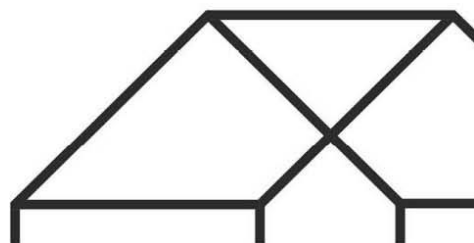
We appreciate the opportunity to provide comments regarding the Draft Environmental Impact Report on the Dana Reserve Specific Plan. Californians for Homeownership is a 501(c)(3) organization devoted to using legal tools and the courts to address California's housing crisis. We are writing in support of the County's efforts to address the housing crisis by facilitating the development of housing within its borders—an effort that will be furthered by its approval of the Dana Reserve Specific Plan.

For several decades, California has experienced a significant housing access and affordability crisis. In recent years, this crisis has reached historic proportions. As a result of the housing affordability crisis, younger Californians are being denied the opportunities for homeownership and housing security that were afforded to previous generations. Many middle and lower income families devote more than half of their take-home pay to rent, leaving little money to pay for transportation, food, healthcare, and other necessities. Unable to set aside money for savings, these families are denied the opportunity to become homeowners, and are at grave risk of losing their housing in the event of a medical issue, car trouble, or other personal emergency. Indeed, housing insecurity in California has led to a mounting homelessness crisis. And the crisis has had a disproportionately harmful effect on historically disadvantaged communities, including individuals with physical and developmental disabilities and communities of color.

At the core of California's housing crisis is its failure to build enough new housing to meet the needs of its growing population. The Legislative Analyst's Office estimates that, from 1980 to 2010, the state should have been building approximately 210,000 units a year in major metropolitan areas to meet housing demand. Instead, it built approximately 120,000 units per year during that period. And the situation is getting worse: in the five-year period from 2013 to 2017 California issued building permits for less than half as many units as it did in 1985-1989. Today, California ranks 49th out of the 50 states in existing housing units per capita.

CFH-1

525 S. Virgil Avenue
Los Angeles, CA 90020



August 1, 2022
Page 2

The Legislature has recognized that the housing crisis is an emergency that requires proactive solutions: “The consequences of failing to effectively and aggressively confront this crisis are hurting millions of Californians, robbing future generations of the chance to call California home, stifling economic opportunities for workers and businesses, worsening poverty and homelessness, and undermining the state’s environmental and climate objectives.” Gov. Code § 65589.5(a)(2)(A).

This project will provide much-needed housing in a variety of housing types and levels of affordability. Approval of the Specific Plan is well-supported by the record, and the County’s environmental review has met the requirements of the California Environmental Quality Act (CEQA).

Sincerely,




Matthew Gelfand

↑
CFH-1
(cont'd)

9.3.7.1 Response to Letter from Californians for Homeownership

Comment No.	Response
CFH-1	The comment expresses support for the proposed project and states that the project will provide much-needed housing in a variety of housing types and levels of affordability. No changes to the environmental document are necessary in response to this comment.

9.3.8 Coalition of Labor Agriculture & Business of San Luis Obispo County



Department of Planning and Building
ATTN: Dana Reserve/Jennifer Guetschow
976 Osos Street, Room 300
San Luis Obispo, CA 93408

August 1, 2022

By Email
From Michael F. Brown Government Affairs Director
colabslo@gmail.com

805 944-4274

Dana Reserve

*Dana Reserve Specific Plan Environmental Impact Report
Chapter 2 Project Description*




Figure 2-9. DRSP Proposed Conceptual Master Development Plan.

The DEIR fails on many grounds including but not limited to:

Context

Science

Fairness

Perspective

Logic

In the end and like most EIRs, it is a compartmentalized, systematic exploitation of the obvious designed to discourage future progress.

Some of these failures are detailed below. However before considering the detail, please read the section immediately below, which provides essential overall context which the DEIR completely ignores.

Table 4-1. Summary of Environmental Impacts Analysis

Environmental Resource	Significant, Unavoidable Adverse Impacts	Significant, but Mitigable Impacts	Less than Significant Impacts
Aesthetics		X	
Agriculture and Forestry Resources		X	
Air Quality	X		
Biological Resources	X		
Cultural Resources		X	
Energy		X	
Geology and Soils		X	
Greenhouse Gas Emissions	X		
Hazards and Hazardous Materials		X	
Hydrology and Water Quality		X	
Land Use and Planning	X		
Mineral Resources			X
Noise		X	
Population and Housing	X		
Public Services		X	
Recreation		X	
Transportation	X		
Tribal Cultural Resources		X	
Utilities and Service Systems		X	
Wildlife		X	

COLAB-1



The Draft Dana Reserve Environmental Impact Report (DEIR) finds CEQA Class I unmitigatable impacts for 6 of the Environmental Resource criteria. These include Air Quality, Biological Resources, Greenhouse Gas Emissions, Population and Housing, and Transportation.

The combined findings would forbid decision makers from approving the project, except that CEQA provides that project alternatives can be considered if the project cannot be moved to a different location. In this case the developer does not own an alternative site where the project could be located.

More blatantly, it ignores the fact that there is no site in the unincorporated county owned by a private person on which the 288 acre project could be located. The County's Housing Element inventory of existing sites demonstrates this fact conclusively. See pages in section 7 - (8) - 7-(20) of the Housing element for the detail. The data for the categories is summarized below.

Very Low and Low

Assessor's Parcel Number	Community	General Plan Designation and Zone	Acres	Maximum Allowable Density (units/ac)	Maximum Potential Units Per General Plan	Realistic Potential Units (18 units/ac)	Affordability Category	Water Capacity (Y/N?)	Sewer Capacity (Y/N?)	Electrical Service Available (Y/N?)	Internet Service Available (Y/N?)
017-322-016	Shandon	CR	2.31	38	88	41	Lower	Yes	Yes	Yes	Yes
TOTALS			81.96		3,114	1,459					

Moderate

Totals			57.8		2,003	975					
---------------	--	--	-------------	--	--------------	------------	--	--	--	--	--

Note that only a total of 139.8 acres are zoned for low and moderate in the entire unincorporated area. The Dana reserve at 288 acres exceeds this amount.

Above Moderate

Totals			194.39		1,205	821					
---------------	--	--	---------------	--	--------------	------------	--	--	--	--	--

Only 194.4 acres are zoned for above moderate (everything else). Even when above moderate is added in, there are only 333.8 acres zoned in the entire unincorporated County for homes.

The County's scheme of land use provides no substantial opportunity to develop large numbers of homes with economies of scale on any basis. The fact that it has a State approved Housing Element is simply window dressing and a result of the narrow and incomplete State criteria for achieving approved housing elements.

Basically, the County's scheme of land use is destined to preserve and promote large lot and estate type development of homes in excess of \$1 million or more in price for high income/high net worth whites seeking a rural or semi-rural lifestyle. It is patently discriminatory and is particularly abusive of Hispanic families, black families, agricultural workers who are largely

COLAB-1
(cont'd)

COLAB-2

COLAB-3

Hispanic, aging persons on fixed incomes, single mothers, homeless people, and young people seeking to form a family household.

Moreover, it seeks to concentrate low and moderate income people in dense development within the corporate cities and unincorporated URLs. Here, the County is again concentrating low and moderate income people (many of whom are Hispanic, Black, Native American) into dense zones. All this is camouflaged under the rubric of fighting global warming and promoting “efficient” development.

In turn, and because where you live has everything to do with your chances in life, the lower income people are condemned to the worst schools, highest tax and fee jurisdictions, crime, cannabis dispensaries, traffic noise (scary sirens and public transit buses roaring down the streets), homeless encampments, and all the rest.

Please see the article Addendum I to this EIR response at the end for further information.

The California Environmental Quality Act (CEQA)

In the case of the Dana Reserve Project and many other projects, CEQA is abused by local planners, decision makers, and intervenors to aid and abet the social and racial concentration of the poor into dense urban areas with older and often deteriorated housing. In turn, this insulates the upper middle and upper income whites from the negative urban living problems of crime, drug and alcohol abuse, noise, traffic, and social unrest.

The permitting data reveals the terrible truth: Notwithstanding all the rhetoric, hardly any dwelling units are being permitted in the unincorporated area at all. Remember, the table below summarizes the number of units permitted, not the number actually constructed. The largest numbers are in the South County area and mainly consist of units permitted decades ago in the Nipomo golf communities. Most of the units are the result of the developers implementing a deferred phase of construction, not truly new permits.

COLAB-3
(cont'd)

COLAB-4

COLAB-5

Were it not for these the County would have permitted less than 100 during the first 3 quarters of 2021 – 22.

New Dwelling Units ¹ by Planning Area/Sub Area, 2005-2021

Planning Area/Sub Area	05-06	06-07	07-08	08-09	09-10	10-11	11-12	12-13	13-14	14-15	15-16	16-17	17-18	18-19	19-20	20-21 ²
Adelaida	24	12	21	11	3	5	3	2	5	5	4	8	5	8	6	4
Carrizo ³	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	0
El Pomar-Estrella	90	53	33	14	9	11	10	20	38	16	28	19	22	26	15	12
Estero	19	15	13	6	10	8	3	6	13	8	7	18	6	10	7	7
Las Pilitas	0	6	5	2	5	1	3	1	2	1	0	1	1	1	0	2
Los Padres (North)	2	0	0	0	1	2	1	0	0	0	0	0	0	0	0	0
Nacimiento	43	32	18	11	7	9	10	33	50	21	20	25	27	18	14	9
North Coast	14	7	9	1	5	0	3	7	2	3	2	0	0	2	1	1
Salinas River	99	41	33	36	25	16	15	21	45	60	65	207	74	86	65	37
San Luis Bay Coastal	52	22	70	7	15	13	17	34	41	25	30	39	41	9	11	1
San Luis Obispo	11	9	11	2	4	4	5	6	9	2	4	10	5	8	12	10
Shandon-Carrizo (North)	28	28	11	5	2	4	6	2	4	0	4	4	3	6	5	12
South County ⁴	71	34	77	19	17	40	35	114	157	116	113	161	131	118	102	116
South County Coastal ³	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	0
Total	453	259	301	114	103	113	111	246	366	257	277	492	315	292	238	211

1. Only including units subject to the Growth Management Ordinance. For 20015-2016, based on number of construction permit applications received in fiscal year. For 2017-2021, based on number of construction permits issued in fiscal year.
 2. As of April 26, 2021.
 3. Carrizo and South County Coastal Planning Areas were added to this chart for FY 21-22 and were not tracked in previous years' annual allocation reports.
 4. Huasna-Lopez Sub Area was removed from this chart for FY 21-22 because it is included in the South County Planning Area.

COLAB-5
(cont'd)

In these regards, as outlined above, the entire EIR and process are terribly flawed and designed to kill the project. After all, it lists alternative 3 as the preferred project. Under Alternative 3, the residential land use category would be limited to approximately 78 to 390 rural residential units (plus associated ADU development) instead of the 1300 proposed in the application.

Alternative 3 would be less dense, have many fewer homes, and lack the economies of scale necessary to produce work force and low income units.

Specific Dana Reserve Class I Impacts:

Air Quality.

Actually, the project appears to meet or exceed all the clean air requirements that pertain to existing or potential problems from dunes dust, chemical, agricultural, or other sources.

COLAB-6

COLAB-7

Instead, the key unmitigatable source (CO2 and other tailpipe gases) is alleged to be the fact that the project would increase the housing jobs imbalance and the new residents would have to drive their cars to area employment centers, most likely in Santa Maria and San Luis Obispo.

Inconsistent. The proposed project is located within the NCSO Sphere of Influence (SOI). Nipomo is an unincorporated area that is jobs poor. The project would result in the creation of 1,441 dwelling units (including ADUs) and approximately 273 new jobs, which would increase

anticipated to hinder regional and local improvements related to increased transportation mobility and potential increase in VMT. Although the DRSP would include commercial uses and infrastructure to promote the use of public transit and walking and bicycling (e.g., Park and Ride lot, transit service expansion, connections to bicycle lane network), it would remain inconsistent with this measure.

The project is to be built in phases over many years. The State of California has set 2035 as the year when no new fossil fuel vehicles can be sold in the State. During the run up period over the next decade the number of fossil fuel cars should decline swiftly. This barrier, and its assignment as an unmitigatable Class I Impact, is therefore false as the problem is already scheduled to be solved.

The EIR cites the fact that the project would exceed VMT in reaching its conclusion. This is detailed in the Transportation section of the DEIR

Table 4.3-8. Project VMT Impact Summary

Category	VMT Per Employee	VMT Per Capita
County Threshold	25.7	27.2
Proposed Project	26.9	30.0
Percent Reduction in VMT Required to Reduce to Below Threshold	4.46%	9.34%

Source: AMBIENT (2022)

Other operational air quality impacts of the project are also listed as unmitigatable.

With implementation of Mitigation Measures AQ/mm-3.3 and TR/mm-3.1, operational annual emissions would be reduced to below SLOAPCD's significance threshold; however, daily emissions would continue to exceed SLOAPCD's significance threshold. Therefore, impacts related to the generation of criteria pollutants in exceedance of established daily emissions thresholds would be significant and unavoidable.

COLAB-7
(cont'd)

COLAB-8

COLAB-9

Table 4.3-11. Operational Emissions without Mitigation

Operational Period/Source	Emissions ¹						
	ROG	NOx	ROG+NOx	CO	PM ₁₀		Total
					Fugitive	Exhaust	
Daily Emissions (lbs/day)							
Area Source	59.5	1.4	60.9	118.8	0	0.7	0.7
Energy Use	1.0	8.5	9.5	4.2	0	0.7	0.7
Mobile	34.9	54.7	89.6	350.2	115.8	0.7	116.5
Total Project Emissions	95.4	64.6	160.0	473.3	115.8	2.0	117.8
SLOAPCD Significance Thresholds	--	--	25	550	25	1.25	--
Exceeds SLOAPCD Thresholds?	--	--	Yes	No	Yes	Yes	--
Annual Emissions (tons/year)							
Total Project Emissions	15.6	10.1	25.7	72.0	17.6	0.3	17.9
SLOAPCD Significance Thresholds	--	--	25	--	25	--	--
Exceeds SLOAPCD Thresholds?	--	--	Yes	--	No	--	--

Source: AMBIENT (2022)

Note: Based on operational year of 2030 for Hotel, Commercial, Educational, and Residential. Totals may not sum due to rounding. Refer to EIR Appendix D for modeling output files and assumptions.

¹ Daily emissions are based on the highest emissions for summer or winter operational conditions for buildout conditions. Totals may not sum due to rounding.

COLAB-9
(cont'd)

Biological Resources

The EIR Summary Table indicates that the Biological Resources constitute a Class I unmitigatable resource. A lengthy chapter is presented on this subject that lists scores of plant and animal species which will suffer harm if the project is built. It also contains pages of minutiae about possible mitigations. All this is quite confusing.

At the end of the chapter there is a statement of unmitigatable class I resource.

4.4.6 Cumulative Impacts BIO Impact 20: The project would have cumulatively considerable impacts related to biological resources. Cumulative impacts would be significant and unavoidable (Class I). The proposed project's contribution to cumulative impacts on biological resources is based on the loss of open space and associated wildlife habitat. The Specific Plan Area primarily consists of Burton Mesa chaparral, coast live oak woodland, and coast live oak forest, intermixed with various grassland habitats. Several special-status plant and animal species and two sensitive vegetation communities occur on-site, all of which would be impacted by the proposed development, except for 21.7 acres of primarily coast live oak forest habitat. The County anticipates several smaller residential development projects in the surrounding community and two major development projects.

COLAB-10

Basically, it appears that any project of any significance would be too impactful. Obviously, the construction of even 50 houses and some commercial would result in cutting down trees, removing the bushes, etc.

The mitigations listed seem to be massive detailed lists of further studies, annual reporting, and impractical projects.

This section needs to be summarized and structured in way that the public and decision makers can actually assess the gravamen of the issue. In fact a portion of the chapter states:

Evidence of episodic disturbance from farming was observed in the field and from aerial imagery dating back to 1939. Field evidence of very old woodland clearcutting suggests a link to a historic drought between 1862 and 1864 when ranchers were compelled to fell trees for livestock consumption (Guinn 1890; and personal communications between Althouse and Meade with Jim Sinton, family rancher familiar with the Nipomo Mesa). Google Earth imagery indicates that the grassland west of US 101 was last farmed in about 2002, or possibly 2006 (Althouse and Meade 2022a).

*Farming, mowing, and chaparral (brush) removal appears to have been conducted for decades. Imagery from 1939 shows evidence of brush clearing on rolling topography and farmed fields on flatter terrain, and imagery from 1949 indicates some of the brush cover and associated coast live oaks (*Quercus agrifolia*) were starting to grow back. Some brush clearing is evidenced in 1957. The 1969 to 1994 aerials show chaparral cover generally increasing in areas not actively farmed. Between 1994 and 2002, shrub reduction appears to have reduced brush cover while retaining young trees barely visible in the 1994 imagery. Aerial images from 2002 and years thereafter show reduced brush cover. Livestock pens are visible in 2011 to 2013 aerial imagery.*

Two additional parcels provide a connection from Cherokee Place on the north side of the ranch to Willow Road. The western 7-acre parcel is undeveloped and shows evidence of significant site disturbance from past dry farming. There are no trees, weedy species dominate, and a few bushes have become reestablished and/or have regenerated since 2010 when the last mowing appears to have occurred. The eastern 7-acre parcel is densely wooded with a residence and numerous animal pens for horses, chickens, and other animals.

This is not some pristine natural land untouched by humans.

Greenhouse Gas Emissions

COLAB-10
(cont'd)

COLAB-11

GHG Impact 3 (Class I)
The project would conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.
Mitigation Measures
Implement Mitigation Measures AQ/mm-3.1, AQ/mm-3.3, GHG/mm-1.1, and TR/mm-3.1.
Residual Impacts
Implementation of Mitigation Measures AQ/mm-3.1, AQ/mm-3.3, GHG/mm-1.1, and TR/mm-3.1 would reduce potential impacts related to operational GHG emissions from the proposed project. However, the project would generate VMT in a manner that would be inconsistent with SLOCOG's 2019 RTP/SCS and the effectiveness of the identified mitigation to reduce this impact below applicable thresholds is not certain. Therefore, with implementation of identified mitigation, potential impacts would be significant and unavoidable (Class I).

COLAB-11
(cont'd)

Cumulative Impacts GHG Impact

The project would result in a cumulatively considerable impact to greenhouse gas emissions. Cumulative impacts would be significant and unavoidable (Class I). As discussed in Chapter 3, Environmental Setting, the cumulative impact analysis is based on the County's cumulative projects list. Cumulative projects would generate residential, industrial, and commercial development within the county. Project-specific impacts related to the generation of short and long-term GHG emissions would be less than significant with mitigation.

COLAB NOTE: This pretzel logic. Recognizing that the planet is a closed eco system, nothing more could ever be bold anywhere in the world which generates any significant CO_{2e}. The fact that the measure is confined to SLO is ridiculous since the alleged problem is planetary. The DEIR is simply cherry picking the arbitrary county boundary as its frame of reference.

Based on required compliance with existing diesel idling requirement, the CBC and CALGreen, and the County's solid waste reduction goals, reasonably foreseeable future projects are not anticipated to result in short- or long-term GHG emissions that would conflict with established thresholds. Nevertheless, reasonably foreseeable future projects would be subject to separate environmental review to determine potential impacts related to GHG emissions and reduce GHG emissions, as necessary. Therefore, impacts would be less than cumulatively considerable.

COLAB-12

The project would generate VMT that would exceed the significance threshold of 25.7 VMT per employee and 27.2 VMT per capita; therefore, the proposed project would be inconsistent with the 2019 RTP/SCS and the effectiveness of identified mitigation included to reduce this impact is not certain, thus it would remain significant and unavoidable. Reasonably foreseeable future projects would likely contribute to VMT within the vicinity of the Specific Plan Area. Individual future projects would be subject to separate environmental review to determine individual

impacts related to consistency with the 2019 RTP/SCS and implement reduction measures as necessary and feasible.

Other reasonably foreseeable future projects are not anticipated to generate population growth or VMT of this scale; however, reasonably foreseeable future projects within the vicinity of the Specific Plan Area still have the potential to contribute VMT and further exceed established thresholds.

Since other reasonably foreseeable future projects are anticipated to generate substantially less population growth and VMT, implementation of long-term VMT reduction strategies would likely mitigate impacts to below established VMT thresholds. However, due to project-specific significant impacts, cumulative impacts would be significant and unavoidable

Table 4.8-2. SLOAPCD GHG Thresholds of Significance

Operational Year	2030
Land Use Sectors GHG Emissions Target ¹	213,000,000
Population ²	41,860,549
Employment ³	20,729,820
Service Population (SP)	62,590,369
GHG Efficiency Threshold (MTCO ₂ e/SP/year)	3.4

Source: AMBIENT (2022)

This chart is for the whole county. It is not just for the emissions attributable to the unincorporated county over which the Board of Supervisors has regulatory land use authority. It is unfair and the goal should be for the unincorporated county. Note that per the table below, from its adopted Energy Wise Plan.

Where does the 213,000,000 (million) come from?

Is this for the whole county including cities?

The unincorporated county only generated 917,000 in 2006.

It should be less now as the County has implemented a number of CO2 reducing programs and projects.

COLAB-12
(cont'd)

COLAB-13

The primary sectors of GHG emissions are transportation (40%), commercial and industrial energy (24%), agriculture (off-road equipment, livestock, and crops) (18%), residential energy (15%), waste (3%), and aircraft (less than 0.1%).

Figure 3-4. Unincorporated San Luis Obispo County 2006 GHG Emissions

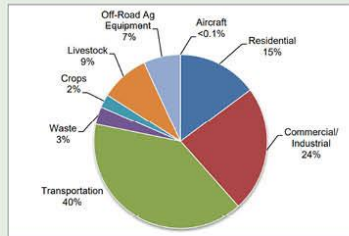
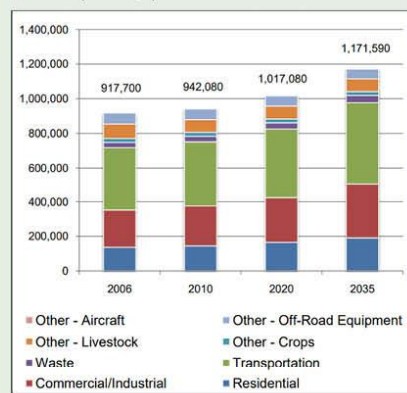


Table 3-1. Unincorporated San Luis Obispo County 2006 GHG Emissions

	2006 GHG Emissions (MTCO ₂ e)	Percentage of Total Emissions
Residential	136,360	15%
Commercial/Industrial	215,970	24%
Transportation	365,260	40%
Waste	30,540	3%
Other – Crops	22,630	2%
Other – Livestock	83,420	9%
Other – Off-Road Equipment	63,280	7%
Other – Aircraft	240	< 0.1%
Total	917,710	100%¹

1. Due to rounding, the sum of individual values may not equal the total given.

Figure ES-3. Community-Wide GHG Emissions Forecast (MTCO₂e)



COLAB-14

Table 4.8-5. Operational GHG Emissions Without Mitigation

Operational Year/Source	2030 GHG Emissions (MTCO _{2e} /year)
Area Source ¹	32.9
Energy Use ²	2,477.2
Motor Vehicles ³	13,836.04
Waste ⁴	368.2
Water ⁵	169.6
Total Operational Emissions	16,884.0
Amortized Construction Emissions	987.3
Total with Amortized Construction Emissions	17,871.3
Service Population (SP) ⁶	4,826
MTCO_{2e}/SP	3.7
GHG Efficiency Significance Threshold	3.4
Exceeds Threshold?	Yes

Source: AIRQUALM (2017)

COLAB-14
(cont'd)

This section of the DEIR lacks appropriate context and data:

- What percent of SO County’s total MTCO_{2e} emissions do 17,871.3 represent? Is this significant enough to reject the project?
- What percent of California’s total MTCO_{2e} emissions do 17,871.3 represent?
- As noted above, if all new vehicles sold in 2035 and after must be electric, what is the validity of this finding?
- Given all of other new and accumulated State regulations on vehicle emissions, how valid is the 13, 836.04 number?
- Are the calculations formulae underlying the number based on current laws or were the formula basis developed 5 years ago?

COLAB-15

Land Use and Planning

Car Pollution by the Trip to Work: This section promulgates 3 Class I unmitable imapcts . The first one , below, is based the Countypolicy that homes should be bult close to work palces. The problme is tthat the largest employers are in Santa Maria, San Luis Obispo, the Cal Poly Campus, the Atascadero State Hospital, and several scattaered large school districts. The County chased the largest Nipomo employer (Philipps 66) out of the County when it rejected a lager oil loading facility.

COLAB-16

As noted above , the DEIR Clean Air analysis is obslote and based on old data. Morevoer it is scientifiially irrational as it arbtalaly restriects the CO_{2e} problem boundary to theamount generated in the County. Even if the County and California become entireley carbon free, the United States would have to invade and subdue China, Russia, India, North Korea, Iran, and now

COLAB-17

the European Union to compel them to reduce their exponential expansion of fossil fuel use. This would be a war which the US would lose. China would wind up administering western north America which would end any consideration of this symbookc and destrictive set of policies.

LUP Impact 3 (Class I)
<i>The project would adversely affect the local jobs-to-housing ratio within the project area and would be inconsistent with Land Use Planning Policy L-3 of the San Luis Obispo County Clean Air Plan.</i>
Mitigation Measures
<i>No feasible mitigation has been identified.</i>
Residual Impacts
<i>Potential impacts associated with policy inconsistency would be significant and unavoidable (Class I).</i>

COLAB-17
(cont'd)

Rare Plants: The DEIR promulgates an unmitagatable Class I Impact due to rare plants on the site. It is a mixed chaparral / oak woodland which cover thousands of sq. miles in southern and central California. While the development would impact specific plant on the site, it would not strategically impact the overall range of the species.

COLAB-18

Moreover the site has been anthropomorphically disturbed over the decades by grazing and agriculture. This is not a pristine evolutionary biological community.

COLAB-19

In 2011, the County Planner who wrote the Conservation and Open Space element revealed us that it was designed to forestall as much development as possible. He was amazed that there was not more public opposition.

COLAB-20

Once again the site is being treated as if it were the universe as opposed to an infinitesimal portion of the Oak/Chaparral environment.

COLAB-21

Reportedly, the California Rare Plant Society has threatened to sue the County if the project is approved. Of course hundreds of acres of this environment are burned to scorched earth over the years because governments will not allow controlled burns, fire breaks, timber harvesting, agriculture, and other fire control mechanisms. Should they sue, the Planner should be subpoenaed to the depositions and testify under oath about his biased development of the ordinance.

COLAB-22

LUP Impact 5 (Class I)
<i>The project would result in the net loss of California Rare Plant Rank 4 and Watch List plant species, native oak woodland, and sensitive habitats; therefore, the project would be potentially inconsistent with goals and policies of the County of San Luis Obispo General Plan Conservation Open Space Element pertaining to preservation of biological resources and Policy 3.8 of the Parks and Recreation Element.</i>

4.11-37

Sensitive Biological Resources: and Views Here the DEIR finds a Class I unmitigatable impact due to the conversion of the view of the site to a development and the loss of biological resources .

Views: Most of the people viewing the site are driving past it on Highway 101 at 65 miles per hour while focusing on the cars ahead of them to avoid the frequent back down induced rear end crashes which occur in that section the highway. They only have a few seconds to look. Moreover, the west side section of the highway immediately to the South contains a series of commercial developments including a large Flea Market, RV Sales lot, furniture outlets, bill boards, and condominiums. The east side contains a pot puree of dilapidated trailer parks, bill boards ,dog kennels, plant nurseries and broken down vehicles.

The DEIR is totally out of context of the area and is a reducto ad absurdum . This isn't the Hearst Ranch or even the Leticia Vineyard.

COLAB-23

LUP Impact 10 (Class I)
The project would result in cumulative impacts associated with inconsistency with Land Use Planning Policy L-3 and goals and policies identified within the County of San Luis Obispo General Plan Conservation and Open Space Element, Framework for Planning (Inland), Land Use Ordinance, and South County Area Plan regarding preservation and no net loss of sensitive biological resources and preservation of rural visual character, compatibility with the natural landscape, and preservation of views of oak woodlands and other visually significant features.
Mitigation Measures
Implement Mitigation Measures AES/mm-3.1 and AES/mm-3.2, AES/mm-7.1, BIO/mm-2.1 through BIO/mm-2.3, BIO/mm-4.1, BIO/mm-15.1, BIO/mm-16.1, BIO/mm-18.1 through BIO/mm-18.4, and BIO/mm-19.1.

Population and Housing

The DEIR asserts that the project will generate too much unplanned population for the Nipomo area. In fact, the County population growth has fallen below all recent estimates. Most of it is in Paso Robles. Also the County has driven its largest Nipomo employer Phillips 66 out of the County and never lifted a finger to help PG&E maintain the Diablo Nuclear Power Plant proving 2000 jobs just a few miles up Highway 101 from Dana project site in n Avila Beach.

Nevertheless, the DEIR ignores this fact and dwells on Plan inconsistency.

COLAB-24

PH Impact 1 (Class I)
The project would induce substantial unplanned population growth in the Nipomo area.
Mitigation Measures
No feasible mitigation has been identified.
Residual Impacts
Potential impacts associated with substantial unplanned population growth would be significant and unavoidable (Class I).

Based on the analysis above, the DRSP is anticipated to result in the future construction of 831 singlefamily dwelling units, 458 multi-family dwelling units, and 152 ADUs. According to the U.S. Census Bureau, the average household size in Nipomo between 2015 and 2019 was 3.16. In order to calculate a more conservative population estimate, the Nipomo average household size was used to calculate the project's estimated residential population rather than rely on the countywide average household size of 2.51. Based on the average local household size in Nipomo, future buildout of DRSP residential land uses is anticipated to result in a residential population increase of approximately 4,555 (Table 4.14-13).

Specific Plan Area PH Impact 1: The project would induce substantial unplanned population growth in the Nipomo area. Impacts would be significant and unavoidable (Class I). The DRSP would allow for the future phased development of residential uses, village commercial uses, flex commercial uses (including light industrial uses), open space, trails, and a public neighborhood park within the 288-acre Specific Plan Area.

Table 4.14-14. Project Residential Population Generation

Land Use Type	Number of Dwelling Units	Nipomo Average Household Size ¹	Estimated Population Generated
Single-Family	831		2,626
Multi-Family	458	3.16	1,448
Accessory Dwelling Units	152		481
Total	1,441	--	4,555

¹ Source: U.S. Census Bureau (2019)

The finding is that unplanned population growth is inconsistent with various plans. However, other than the assertion that the housing to jobs ratio is skewed and that the vehicle miles traveled would increase, there is no data demonstrating that the phased build out the proposed development would cause any real harm in terms of public health and safety.

There are no problems with utilities (in fact the project benefits the entire area population in terms of water availability and cost), no public safety issues, no parks issues, no school issues,

COLAB-24
(cont'd)

COLAB-25

COLAB-26

ET. In fact the DEIR lists all the other measures in this category as potentially consistent with policies, plans, and ordinances.

The jobs/housing balance is a red herring because there is no way that Nipomo has sufficient land zoned for large commercial projects such as office parks. In fact the Dana reserve project actually provides development which adds 250 jobs. As we note above in the Land Use and Planning Section, the key employers are in or adjacent to the City of San Luis Obispo and in the City of Santa Maria.

Area governments, institutions, and private sector employers all not difficulty in recruiting and retaining employees. One of the main reasons is lack of housing.

In this case the DEIR would have the decision makers look a gift horse in mouth in all respects in compliance with stale and obsolete policies produced by ideological anti-growth staffers over a decade ago.

Transportation

This section simply regurgitates the impossibility of adding more homes without adding any traffic. It does however list the potential of some mitigation which could help.

TR Impact 3 (Class I)	
Buildout of the Specific Plan Area would exceed the County VMT thresholds and therefore would not be consistent with State CEQA Guidelines Section 15064.3(b). VMT per employee would be incrementally reduced compared to existing conditions; however, the project-related increase in residential VMT per capita and overall VMT would exceed the County VMT thresholds.	
Mitigation Measures	
TR/mm-3.1	<p><i>A transportation demand management program or identification of transportation demand management strategies to implement would be required of each applicant. The residential, commercial, education, and/or hotel development applicant in consultation with the County of San Luis Obispo will choose feasible transportation demand management strategies and tailor to the development proposal. Potential measures to reduce vehicle miles traveled include, but are not limited to:</i></p> <ol style="list-style-type: none"> 1. <i>Improve or increase access to transit</i> 2. <i>Increase access to common goods and services</i> 3. <i>Incorporate affordable housing into the project</i> 4. <i>Orient the project towards transit, bicycle, and pedestrian facilities</i> 5. <i>Improve bicycle and/or pedestrian facilities and/or transit services</i> 6. <i>Limit or eliminate parking supply</i> 7. <i>Implement or provide access to commute reduction programs</i> 8. <i>Provide car-, bike-, and ride-sharing programs</i> 9. <i>Provide transit passes</i> 10. <i>Provide on-site amenities at places of work</i>

↑ COLAB-26
(cont'd)



COLAB-27

COLAB-28



TR Impact 9 (Class I)
The project would result in a cumulatively considerable impact to transportation and traffic.
Mitigation Measures
Implement Mitigation Measure TR/mm-3.1.
Residual Impacts
<i>Cumulative impacts related to consistency with applicable plans, hazardous roadways design, and emergency access would be avoided through compliance with identified project-specific mitigation; no additional mitigation is needed to avoid or minimize potential cumulative impacts. However, implementation of Mitigation Measure TR/mm-3.1 would not reduce impacts to a less-than-significant level. Therefore, residual cumulative impacts would be significant and unavoidable (Class I).</i>

COLAB-28
(cont'd)

ADDENDUM I



COLAB-29

**THE DEHUMANIZING TYRANNY OF
 DENSIFICATION**

The prevailing vision of environmentalism today caters to a global oligarchy.

BY EDWARD RING

Filing cabinet of human lives, Where people swarm like bees in tunneled hives, Each to his own cell in the covered comb, Identical and cramped—we call it home."

— Gerald Raftery, "Apartment House"

The conventional wisdom among America's liberals, often seconded and rarely challenged by conservatives, is that population growth in the United States should be channeled as much as

possible into the footprint of existing cities. Surrounding cities should be “greenbelts,” suburban growth should be rejected as unsustainable “sprawl,” and human settlement in areas defined as the “urban-wildland interface” should be discouraged and, where possible, reversed.

The movement to increase the population density of cities and reduce rural populations is already enshrined in California law and is rolling quietly across the rest of the nation. It is marketed as enlightened, environmentally sustainable urban planning, but the moral pretext obscures a self-serving density agenda that is shared by several powerful special interests.

Among all the misanthropic trends in public policy that threaten the freedom and prosperity of ordinary Americans, the density agenda is probably the least discussed.

Stated simply, population densification will fundamentally undermine Americans’ ability to preserve their freedom and independence. You don’t have to reference Agenda 2030—about which it is now almost *impossible* to find any negative commentary online—to understand how easily a population can be controlled when it is relocated and concentrated into a handful of megacities.

In the 1990s, shortly before the end of apartheid, I remember speaking with someone who had just returned from a tour of South Africa. He commented on his impressions of the densely populated black townships that were adjacent to every major city.

“They’ve got them all bottled up tight as sardines in a can,” he said, “nice and neat, so whenever they want, they can zap them all.”

Here is an aerial photo of neighborhoods in Soweto, just outside Johannesburg. It was perhaps the most infamous township of the apartheid era.

COLAB-29
(cont’d)

The Racist Bantustan
Soweto, South Africa
40' x 80' lots, single family dwellings



COLAB-29
(cont'd)

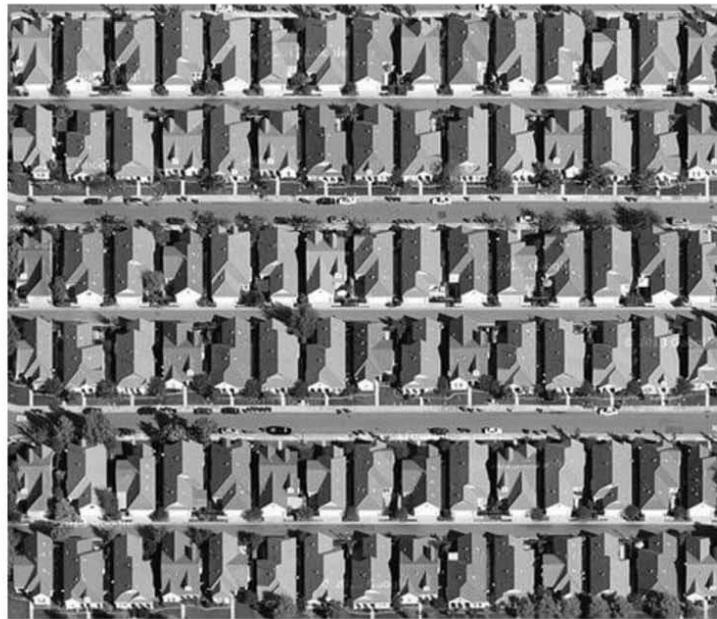
This image, which corresponds to a population density exceeding 20,000 people per square mile, reveals how blacks in Soweto were pushed into packed neighborhoods where they could easily be contained in the event of mass civil unrest.

In America, even this population density is frowned upon by enlightened environmentalists. After all, those people lived in “single-family dwellings,” which are themselves “exclusionary” and “unsustainable.” In California, and against the odds, politically connected developers can still build limited numbers of single-family dwellings because free-standing individual homes are the overwhelming choice of families, if they can afford them.

Featured below is an aerial photo of such a development in Sacramento, California’s state capital and one of the citadels of green extremism. Note the lot size. These 40-by-80-foot lots are precisely the same size as those in Soweto.

COLAB-29
(cont'd)

The Green Bantustan
Sacramento, California
40' x 80' lots, single family dwellings



COLAB-29
(cont'd)

How those neighborhoods are evaluated by mainstream commentators bespeaks a blithe hypocrisy. In Soweto, such neighborhoods were variously described as concentration camps where people were confined and subjected to inhumane crowding. In Sacramento, these neighborhoods are under attack as environmentally incorrect “sprawl,” as laws and zoning increasingly favor multifamily dwellings.

Causes and Effects

Economics, not any particular concern for the planet, drives the density agenda. Chief among these economic imperatives is to render housing barely affordable. Reducing the supply of housing while increasing the U.S. population through loose immigration policies creates shortages, which then drive-up prices.

Perpetually inflating the value of real estate, in turn, creates new asset collateral. This helps balance the U.S. trade deficit, as foreign investors repatriate dollars by buying expensive American real estate. It also enables the ongoing U.S. trade deficit, as homeowners are seduced

into borrowing against their home equity to purchase imported consumer products. The macroeconomic scheme that lets Americans print as much currency as they want and monetize

the world with dollars purchasing foreign goods is sustained, in large part, by keeping the value of U.S. real estate artificially high.

That isn't the only reason to cram people into the footprint of existing cities and jack up the cost of all housing through engineered shortages. The interests of public-sector unions and public utilities are another powerful driver obscured by density policies.

Public-sector unions always benefit when public infrastructure spending is restricted due to environmental concerns. Instead of investing public funds to build and upgrade reservoirs, aqueducts, and freeways, public agencies can allocate more of their budgets to increasing the pay and benefits for government workers. Local public-sector fiefdoms also benefit when the population is increased in existing jurisdictions. In the past, the integrity of existing suburbs would not be violated, and instead, new cities outside established jurisdictions would gain those new residents and collect the new tax revenue.

Public utilities have a powerful financial incentive to embrace the density agenda and its intimate sibling, the renewables agenda. When people are forced to ration energy and water as more people are crammed into existing neighborhoods, the same utility grids—water, power, and wastewater—can be employed without costly expansion. Never mind that residents will now be restricted to 40 gallons of indoor water use per day, or pay to have expensive dual water meters installed so bureaucrats can impose and monitor an outdoor “water budget.” Never mind that renewable electricity flowing through smart meters will cost households 50 cents or more per kilowatt-hour during peak demand times, or that there will no longer be enough wastewater flowing through the sewer pipes to move the effluent.

Public utilities will deliver less of everything but charge much more. Their revenue will go up even as their deliveries go down. And since their earnings are restricted to a regulated percentage of total revenue, they will make more profit than ever.

Planned Obsolescence Is the New Normal

The density agenda is the product of intersecting benefits that attract a powerful coalition of special interests. In almost every sector of the economy, monopolistic corporate special interests have navigated a profitable path that furthers the shared agenda.

When environmentalist-inspired regulations make it almost impossible to get building permits, public entities collect higher fees, and favored developers build homes they can sell for more money and more profit. When environmentalists litigate to stop the construction of a new

COLAB-29
(cont'd)

reservoir, public agencies retain the funds for more internally remunerative uses, and the possibility of new home construction is diminished. Without access to water, new homes cannot get built. When homes are too expensive for most families to afford, institutional investors roll in and buy whole subdivisions and rent them all, depriving Americans of what throughout our history was the most reliable way to build generational wealth.

It is crucial to understand the collaborative role of the high-tech industry in all this. Property management by institutional investors, along with the operation of modern appliances by

individual homeowners, will be facilitated by appliances connected to the internet and algorithmically monitored.

Tech firms will secure perpetual and lucrative new revenue streams supplying hardware components for this entire surveillance panopticon, along with collecting fees for mandatory and frequent software updates. Remember the bored Maytag repair man? Those days are done. Technological “upgrades” to enable ultra-efficient appliances mean you’ll replace your refrigerator, washer, dryer, dishwasher, hot water heater, and every other durable good as often as you replace your smartphone. Planned obsolescence, masquerading as green and empowering, is the new normal.

Rationing in all its forms—and seldom ever called by that name—rewards the entrenched elite and harms everyone else.

Banks, institutional investors, mega housing developers, international corporations, tech heavyweights, public utilities, and public agencies all prefer high density. Environmentalism provides cover.

None of this is meant to disparage legitimate expressions of environmentalism. If one wishes to ignore the economic reasons for the high-density movement and ascribe to density proponents purely enlightened motivations, then this comes down to two competing visions of environmentalism and sustainability.

One of them recognizes the importance of building enabling infrastructure so small investors and individual families can afford to live however they wish. Some will prefer the amenities of a densely populated urban core, and others will prefer the ambiance of spacious suburbs. But the notion that Americans are running out of room or resources to build new suburbs is as delusional as the idea that only a “smart” appliance can achieve acceptable levels of efficiency and sustainability. All too often, these are merely opportunistic lies endlessly parroted by journalists who have never examined the facts.

COLAB-29
(cont'd)

The prevailing vision of environmentalism today, unfortunately, caters to a global oligarchy. They have decided it is in their interests, along with the interests of the planet—most definitely in that order—to preach imminent doom. Stack and pack, do it for the earth, and laugh all the way to the bank.

Edward Ring is a senior fellow of the Center for American Greatness. He is also a contributing editor and senior fellow with the California Policy Center, which he co-founded in 2013 and served as its first president. Ring is the author of Fixing California: Abundance, Pragmatism, Optimism (2021) and The Abundance Choice: Our Fight for More Water in California (2022). This article first appeared in the July 26, 2022 edition of American Greatness.

COLAB-29
(cont'd)

9.3.8.1 Response to Letter from Coalition of Labor Agriculture & Business of San Luis Obispo County

Comment No.	Response
COLAB-1	The comment refers to the Class I impacts identified for air quality, biological resources, greenhouse gas emissions, population and housing, and transportation and states the findings would prohibit decision makers from approving the project, except that CEQA provides that project alternatives can be considered if the project cannot be moved to a different location and, in this case, the developer does not own an alternative site where the project could be located. Ultimately, it will be the decision of the lead agency's decision-making body whether or not to reject or approve the proposed project or an alternative. No changes in the environmental document are necessary in response to this comment.
COLAB-2	The comment provides data from the County's Housing Element and notes that similar privately-owned sites do not exist in other parts of the unincorporated county. No changes in the environmental document are necessary in response to this comment.
COLAB-3	The comment relates to concerns regarding economic viability of developing affordable homes in the county. This comment addresses concerns associated with the County's Housing Element, not the proposed project or the EIR. No changes to the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration.
COLAB-4	The comment relates to social and racial issues that are not considered environmental effects under CEQA. No changes to the environmental document are necessary in response to this comment.
COLAB-5	The comment provides data related to the construction of units in the South County area and states that few dwelling units are being permitted in the unincorporated area of the county. This comment addresses concerns associated with the County's lack of permitted dwelling units, not the proposed project or the EIR. No changes to the environmental document are necessary in response to this comment.
COLAB-6	<p>The comment suggests the identification of Alternative 3 as the preferred project would lack the economies of scale to produce workforce and low-income units. This is consistent with the analysis in Section 5.4.4.1 of the EIR.</p> <p>The EIR has been prepared for the proposed project pursuant to CEQA. Per Public Resource Code § 21002.1, the purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided. The EIR has not been prepared to support or kill the project, but has been prepared to identify impacts of the project, as proposed, on the environment based on substantial evidence. As discussed in Chapter 5, <i>Alternatives Analysis</i>, the State CEQA Guidelines require an analysis of alternatives to identify an environmentally superior alternative among the alternatives evaluated in the EIR. The environmentally superior alternative is the alternative that would minimize adverse impacts to the environment. Based on the evaluation of alternatives, the No Project Alternative would be the environmentally superior alternative because it would minimize the project's adverse impacts to the environment. However, State CEQA Guidelines Section 15126.6(e)(2) states that if the No Project Alternative is also the environmentally superior alternative, the EIR should then identify an environmentally superior alternative among the other alternatives. As summarized in Table 5-3, Alternative 2 (La Cañada Ranch Specific Plan) and Alternative 3 (Residential Rural Cluster Subdivision) would both reduce the project's significant environmental impacts related to GHG emissions, land use and planning, and population and housing. In addition, Alternative 2 (La Cañada Ranch) would further reduce impacts to air quality and transportation, but would increase potential impacts to recreation. Alternative 3 (Residential Rural Cluster Subdivision) would further reduce impacts to biological resources and public services compared to the proposed project, but would potentially increase impacts to utilities and service systems if annexation into the NCSD service area was not feasible. Alternative 3 would meet more of the project's basic objectives than Alternative 2. Therefore, Alternative 3 would be considered the environmentally superior alternative because it would reduce the project's significant impacts and more successfully meet the basic project objectives. Ultimately, it will be the decision of the lead agency's decision-making body whether or not to reject or approve the proposed project or an alternative. No changes to the environmental document are necessary in response to this comment. Refer also to Chapter 10, Supplemental Analysis of the 2023 DRSP.</p>
COLAB-7	The comment states that the project appears to meet or exceed all clean air requirements that pertain to existing or potential problems from dunes dust, chemical, agricultural, or other sources. Refer to Sections 4.3, Air Quality, and 4.8, Greenhouse Gas Emissions. No changes in the environmental document are necessary in response to this comment.

Comment No.	Response
COLAB-8	<p>The comment suggests that a Class 1 impacts related to mobile-source GHG emissions is unnecessary. The precise timing of development of proposed residential and commercial uses within the Specific Plan Area is unknown and would depend on market factors and the goals of individual developers. However, based on a market analysis prepared by the project applicant and project goals, and for purposes of this EIR analysis, it is conservatively anticipated that the project would be built out over approximately 7 years. While it is possible that the number of fossil fuel cars will decline swiftly over the next decade, the actual reduction is currently unknown and cannot be quantified; additionally, existing fossil fuel vehicles will continue to be used by prior owners. Therefore, the EIR conservatively captures the worst-case scenario to evaluate impacts and provides mitigation to address potentially significant impacts and accurately reflects the potential impact associated with air quality emissions as significant and unavoidable. No changes to the environmental document are necessary in response to this comment.</p>
COLAB-9	<p>The comment states that the EIR cites the exceedance of VMT and operational air quality impacts in reaching its conclusion. No changes to the environmental document are necessary in response to this comment.</p>
COLAB-10	<p>The comment notes that Class I impacts have been identified for biological resources and suggests the lengthy chapter presented on this subject is confusing. Section 4.4, <i>Biological Resources</i>, in the EIR has been prepared to address the required checklist questions identified in Appendix G of the State CEQA Guidelines pertaining to biological resources. The determinations of significance of project impacts are based on applicable policies, regulations, goals, and guidelines defined by CEQA and the County. The impact assessment focuses on identifying potential impacts associated with implementation of the project and is based on the site's existing conditions, the regulatory setting, and the project description. The emphasis is on determining the potential effects of the project on federal, state, and locally regulated species and habitats on the project site. Adverse impacts could occur if the project could result in temporary or permanent modification of sensitive communities or habitats occupied by special-status species, or directly affect special-status species. The impact assessment is based on the results of technical studies prepared for the project (Althouse and Meade 2022a) (see EIR Appendix E). The mitigation measures are understandably complex. No changes to the environmental document are necessary in response to this comment.</p>
COLAB-11	<p>The comment suggests the cumulative impacts related to greenhouse gas emissions should not be confined to the county boundary since it is a global problem. As discussed in Section 4.8, <i>Greenhouse Gas Emissions</i>, the impact methodology has been prepared pursuant to the State CEQA Guidelines. A significant impact related to GHGs would occur if the proposed project would generate GHG emissions that exceed established SLOAPCD thresholds or conflict with a plan, policy, or regulation related to GHG emissions. Pursuant to the State CEQA Guidelines Section 15064.4, a project's incremental contribution may be cumulatively considerable even if it appears relatively small compared to statewide, national or global emissions. No changes to the environmental document are necessary in response to this comment.</p>
COLAB-12	<p>The comment has cited text from Section 4.8, <i>Greenhouse Gas Emissions</i>. No changes to the environmental document are necessary in response to this comment.</p>
COLAB-13	<p>The comment refers to Table 4.8-2 in Section 4.8, <i>Greenhouse Gas Emissions</i>, and states the thresholds should only be applicable to the unincorporated county over which the Board of Supervisors has regulatory land use authority. The information in Table 4.8-2 is based on the GHG thresholds of significance developed by the SLOAPCD, which has jurisdiction of the entire South Coast County Air Basin (SCCAB), not just the county or the unincorporated areas of the county. In Table 4.8-2, 213,000,000 represents the SLOAPCD's land use sectors GHG emissions target based on CARB 2017 Climate Scoping Plan Update/SB 32 Scoping Plan Emissions Sector targets. No changes to the environmental document are necessary in response to this comment.</p>
COLAB-14	<p>The comment has cited text from Section 4.8, <i>Greenhouse Gas Emissions</i>. No changes to the environmental document are necessary in response to this comment.</p>
COLAB-15	<p>The comment states the Greenhouse Gas section of the EIR lacks appropriate context and data. Please refer to responses to comments COLAB-11 and COLAB 13. No changes to the environmental document are necessary in response to this comment.</p>
COLAB-16	<p>The comment states that the Land Use and Planning section of the EIR identifies three Class I impacts and reiterates the project's distance from existing job centers. No changes to the environmental document are necessary in response to this comment.</p>
COLAB-17	<p>The comment raises concern regarding the adequacy of the evaluation included for air emissions. Please refer to response to comments COLAB-11 and COLAB-13. No changes to the environmental document are necessary in response to this comment.</p>

Comment No.	Response
COLAB-18	The comment states that mixed chaparral / oak woodland covers thousands of square miles in southern and central California and asserts the development would not impact the overall range of the species. As discussed in Section 4.4, <i>Biological Resources</i> , the Burton Mesa chaparral alliance has a Global/State rank of G1/S1 and is considered critically imperiled. Therefore, loss of almost all (approximately 97%) Burton Mesa chaparral habitat would be significant, and mitigation is necessary to reduce project impacts. The <i>Quercus agrifolia / Adenostoma fasciculatum – (Salvia mellifera)</i> alliance has a Global/State rank of G3/S3 and is considered a sensitive natural community by the CDFW (CDFW 2021b). Therefore, loss of almost all (approximately 96%) <i>Quercus agrifolia / Adenostoma fasciculatum – (Salvia mellifera)</i> habitat would be considered significant, and mitigation is necessary to reduce project impacts. No changes to the environmental document are necessary in response to this comment.
COLAB-19	The comment states that the site has been anthropomorphically disturbed over the decades by grazing and agriculture and is not a pristine evolutionary biological community. Section 4.4, <i>Biological Resources</i> , states evidence of episodic disturbance from farming was observed in the field and from aerial imagery dating back to 1939. No changes to the environmental document are necessary in response to this comment.
COLAB-20	The comment states that in 2011, a County planner who wrote the Conservation and Open Space Element revealed that it was designed to forestall as much development as possible. This comment addresses concerns associated with the County's Conservation and Open Space Element, not the proposed project or the EIR. No changes to the environmental document are necessary in response to this comment.
COLAB-21	The comment states that the site is being treated as if it were the universe as opposed to an infinitesimal portion of the oak/chaparral habitat. Please refer to response to comment COLAB-18. No changes to the environmental document are necessary in response to this comment.
COLAB-22	The comment states that the California Rare Plant Society has threatened to sue the County if the project is approved. No changes in the environmental document are necessary in response to this comment.
COLAB-23	The comment states that the Class I impact related to visual resources resulting from the conversion of the view of the site to a development and the loss of biological and visual resources is out of context. Landscape Architect, Robert Carr, ASLA, prepared the impact analysis included in the Aesthetics section of the DEIR and determined mitigation measures AES/mm-3.1 and AES/mm-3.2 would be sufficient to reduce potential impacts to the visual character of the site and its surroundings to a less-than-significant level. No changes to the environmental document are necessary in response to this comment.
COLAB-24	The comment states that the County population growth has fallen below all recent estimates and the largest County employers are leaving the county. No changes to the environmental document are necessary in response to this comment.
COLAB-25	The comment states that, other than the assertion that the housing-to-jobs ratio is skewed and that the vehicle miles traveled would increase, there is no data demonstrating that the phased buildout of the proposed development would cause any real harm in terms of public health and safety. Health effects related to vehicle emissions are addressed in Sections 4.3, Air Quality, and 4.8, Greenhouse Gas Emissions, of the EIR. No changes to the environmental document are necessary in response to this comment.
COLAB-26	The comment states that there are no problems with utilities, no public safety issues, no parks issues, no school issues, etc. No changes to the environmental document are necessary in response to this comment.
COLAB-27	The comment questions the jobs/housing balance analysis and comments on the effects of the lack of housing. No changes in the environmental document are necessary in response to this comment.
COLAB-28	The comment cites text from Section 4.17, <i>Transportation</i> . No changes to the environmental document are necessary in response to this comment.
COLAB-29	The commenter has included <i>The Dehumanizing Tyranny of Densification</i> by Edward Ring as Addendum I to the comment letter. No changes to the environmental document are necessary in response to this comment.

9.3.9 Healthy Communities Work Group



Date: 8/1/2022

To: Jennifer Guetschow

From: The Healthy Communities Work Group

RE: Dana Reserve Specific Plan - Draft Program Environmental Impact Report

Dear Jennifer Guetschow,

COALITION PARTNERS:

- Bike SLO County
- Cal Poly State University
- Caltrans District 5
- City of San Luis Obispo
- Community Action Partnership of SLO County
- First 5 San Luis Obispo County
- Independent Living Resource Center, Inc.
- People's Self-Help Housing
- Rideshare – Safe Routes to School
- Smart Share Housing Solutions
- SLO Council of Governments
- SLO County Departments:
 - Air Pollution Control District
 - Board of Supervisors
 - Health Commission
 - Public Health
 - Environmental Health
- SLO County YIMBY
- SLO Legal Assistance Foundation

RESOURCES:

- [Data Dashboard, SLO Health Counts](#)
- [Community Health Improvement Plan](#)
- [Building Healthy Communities: Residential Checklist](#)

The Healthy Communities Work Group is a collaboration between public health officials, local planning and transportation officials, community-based organizations, academia, and community members, working to improve health through community design. We provide research and evidence-based recommendations from a health perspective on proposed land use projects, ordinance and general plan amendments, and special projects.

The Healthy Communities Work Group has reviewed the Draft Program Environmental Impact Report (Draft PEIR) for the Dana Reserve Specific Plan, a proposed residential and commercial project to provide up to 1,289 single- and multi-family units located in Nipomo. HCWG strongly supports the Dana Reserve Specific Plan to increase accessible and affordable housing and provide designated paths for non-motorized users; both of which are identified as key priority areas in the 2019 SLO County Community Health Improvement Plan update.¹

HCWG supports the project's objectives to increase affordable housing unit production and allowance of Accessory Dwelling Units. These objectives increase the likelihood of quality housing at a range of affordability levels. Lack of housing availability and affordability negatively impacts physical and mental health. Access to affordable housing enables residents to use their income on basic needs such as food and medical care, which can improve residents' health outcomes. HCWG has several project recommendations to further promote community health.

Criteria pollutants and greenhouse gas emissions may be generated during the proposed development. According to the Draft PEIR, such emissions may surpass acceptable thresholds and impacts would be "significant and unavoidable."² HCWG supports mitigation measures AQ/mm-3.1 - 3.3., which could reduce most construction and long-term operational emissions. HCWG further recommends electrification of all household appliances and installation of heat pumps in all residential units to serve as mitigation measures against long-term operational emissions.

HCWG is concerned about low-income housing units' proximity to highway 101, as serious adverse health effects are associated with long term exposure to traffic pollution. A 2017 California Air Resources Board publication suggests that people living as far as 1,000 feet from freeways may be susceptible to the effects of traffic pollution.³ HCWG strongly recommends the installation of

HCWG-1

HCWG-2

HCWG-3

The Healthy Communities Work Group aims to improve the health and wellness of all current and future San Luis Obispo County residents through collaboration, education, and policy guidance as it relates to the built environment.

high efficiency air filters within each unit to reduce possible effects from poor air quality. **HCWG-3 (cont'd)**

The Draft PIER states the proposed development may result in a cumulatively considerable impact to transportation and traffic. Such residual impacts would be "significant and unavoidable."² HCWG supports mitigation measures TR/mm-3.1, which could reduce emissions related to transportation and circulation. Implementing designated trails for non-motorized users encourages more active forms of transportation, such as walking and bicycling. Engaging in active transportation can reduce daily CO2 emissions associated with travel, as well as improve individual wellbeing.⁴ HCWG supports bicycle racks being provided in open space, commercial, and residential development areas. **HCWG-4**

Thank you for the opportunity to review this project.



Kealoha Ghiglia, REHS
Chair, Healthy Communities Work Group

¹ SLO Health Counts (2019). *Community Health Improvement Plan*. Retrieved April 19th: https://www.slohealthcounts.org/content/sites/slodph/SLO_County_Community_Health_Improvement_Plan_2018-2023.pdf

² County of San Luis Obispo. (2022). *Dana Reserve Specific Plan Environmental Impact Report, Executive Summary*. <https://www.slocounty.ca.gov/Departments/Planning-Building/Forms-Documents/Planning-Projects/Dana-Reserve-Specific-Plan/Draft-Program-Environmental-Impact-Report/0-Executive-Summary.pdf>

³ California Environmental Protection Agency. California Air Resources Board. (April 2017). *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways*.

⁴ Brand et al. (2021). The climate change mitigation effects of daily active travel in cities. *Transportation Research Part D: Transport and Environment*, 93(102764), <https://doi.org/10.1016/j.trd.2021.102764>

9.3.9.1 Response to Letter from Healthy Communities Work Group

Comment No.	Response
HCWG-1	The comment states that the Healthy Communities Work Group (HCWG) supports the project objectives to increase affordable housing unit production and allow accessory dwelling units. No changes to the environmental document are necessary in response to this comment.
HCWG-2	<p>The comment supports Mitigation Measures AQ/mm-3.1 through AQ/mm-3.3 and the requirement for electrification of all household appliances and installation of heat pumps in all residential units to serve as mitigation measures against long-term operational emissions.</p> <p>Mitigation measure AQ/mm-3.3 would require installation of electric fireplaces in place of residential wood-burning appliances and requires all built-in appliances to comply with California Title 20, Appliance Efficiency Regulation. The recently updated 2022 Building Energy Efficiency Standards (2022 Standards), which were approved in December 2021, encourage efficient electric heat pumps, establishes electric-ready requirements when natural gas is installed and to support the future installation of battery storage, and further expands solar PV and battery storage standards. No changes to the environmental document are necessary in response to this comment.</p>
HCWG-3	<p>The comment states that HCWG is concerned about low-income housing units' proximity to Highway 101, as serious adverse health effects are associated with long-term exposure to traffic pollution and recommends the installation of high efficiency air filters within each unit to reduce possible effects from poor air quality.</p> <p>As currently proposed, planned future residential development would primarily be located in excess of 500 feet from US 101. The planned future childcare center would also be located in excess of 500 feet of US 101. However, a small portion of planned multi-family residential units located within the northeastern and southeastern portion of the project site have the potential to be located within 500 feet of US 101. Since the exact development plan for future buildout of the Specific Plan Area is currently not known, depending on the land uses that are ultimately developed, other sensitive land uses, such as childcare centers, have the potential to be located within planned future commercial areas. Mitigation Measure AQ/mm-5.1 would require future development of sensitive land uses, including residential dwellings, childcare facilities, or other sensitive land uses, to be located a minimum of 500 feet from US 101, a distance recommended by the SLOAPCD. SLOAPCD has indicated that health risks associated with proximity to major roadways in San Luis Obispo County are not as concerning as more populated areas of the state (such as southern California). In addition, prevailing winds in San Luis Obispo County generally flow in an easterly direction, meaning areas west of the highway are at a further reduced risk of impacts related to freeway emissions.</p> <p>Buildout of the Specific Plan Area would require implementation of Mitigation Measures AQ/mm-3.1, AQ/mm-3.2, AQ/mm-3.3, GHG/mm-1.1, and TR/mm-3.1 to limit construction- and operations-related emissions of criteria air pollutants, PM, and TACs. Mitigation Measure AQ/mm-5.1 requires that no sensitive land uses, including residential dwellings, be located within the 500-foot buffer unless a detailed Health Risk Assessment, approved by the SLOAPCD, documents that no significant health risks associated with proximity to US 101 would occur associated with the proposed development. Installation of high efficiency air filters are a common requirement of these types of Health Risk Assessments should any approved thresholds be exceeded. No changes to the environmental document are necessary in response to this comment.</p>
HCWG-4	The comment states support for Mitigation Measure TR/mm-3.1 and other project components encouraging non-motorized travel. No changes to the environmental document are necessary in response to this comment.

9.3.10 Home Builders Association of the Central Coast



August 1, 2022

County of San Luis Obispo
Department of Planning and Building
Attn: Jennifer Guetschow
Sent via Email

Re: Dana Reserve EIR

Dear Jennifer Guetschow:

The HBA of the Central Coast supports projects like Dana Reserve that build responsible and desirable residential neighborhoods; add attainable, affordable and market rate housing; and integrate jobs, daycare, trails, parks, and open spaces. Every project requires some mitigation. We hope that you see the myriad of benefits outweigh the issues.

This project mitigation offers the means to promote both housing and reasonable conservation. It brings in water reliability for Nipomo residents. Being centrally located in our rural county, the commute to job centers would be minimal to San Luis Obispo, our coastal beach towns, and Santa Maria. While there would be trees removed, the proposed mitigation plants or preserves 4 to 5 times the number of trees it would remove. This meets and exceeds the County and CEQA guidelines. Water is important. Trees are important. Housing our county workforce is equally important. With the housing crisis (and related homelessness crisis) drastically affecting our state, county, and cities, we need satisfactory compromise to create more housing.

Every house built, adds more supply and houses more Californians. Increasing supply decreases housing demand, thereby lowering current non-sustainable and unaffordable housing prices. We ask you to consider these factors and approve projects like Dana Reserve.

Thank you.

Lindy Hatcher

Lindy Hatcher
Executive Director
Home Builders Association of the Central Coast
406-750-7682
LHatcher@hbacc.org

HBA-1

9.3.10.1 Response to Letter from Home Builders Association of the Central Coast

Comment No.	Response
HBA-1	<p>The comment expresses support for the project and projects that build responsible and desirable residential neighborhoods; add attainable, affordable and market rate housing; and integrate jobs, daycare, trails, parks, and open spaces. The comment also points to the need to balance these benefits of the project with other adverse issues.</p> <p>Ultimately, it will be the decision of the lead agency's decision-making body whether or not to reject or approve the proposed project or an alternative. No changes in the environmental document are necessary in response to this comment.</p>

9.3.11 Southwest Regional Council of Carpenters (via Mitchell M. Tsai, Attorney at Law)

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



139 South Hudson Avenue
Suite 200
Pasadena, California 91101

VIA E-MAIL

August 1, 2022

Jennifer Guetschow
Project Manager
County of San Luis Obispo
976 Osos Street Room 300
San Luis Obispo, CA 93408
Em: jguetschow@co.slo.ca.us

RE: Draft Environmental Impact Report Dana Reserve Project Dana Reserve DEIR

Dear Jennifer Guetschow,

On behalf of the Southwest Regional Council of Carpenters (“**Southwest Carpenters**” or “**SWRCC**”), my Office is submitting these comments on the County of San Luis Obispo (“**County**” or “**Lead Agency**”) Draft Environmental Impact Report (“**DEIR**”) (SCH No. 2021060558) for the Dana Reserve Project (“**Project**”).

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

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

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

SWRCC incorporates by reference all comments raising issues regarding the DEIR submitted prior to certification of the EIR for the Project. *Citizens for Clean Energy v City of Woodland* (2014) 225 Cal. App. 4th 173, 191 (finding that any party who has objected

SWRCC-1

County of San Luis Obispo – Dana Reserve
August 1, 2022
Page 2 of 15

to the Project’s environmental documentation may assert any issue timely raised by other parties).

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

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

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

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

SWRCC-1
(cont’d)

SWRCC-2

County of San Luis Obispo – Dana Reserve
August 1, 2022
Page 3 of 15

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

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

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

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

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

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

SWRCC-2
(cont'd)

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

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

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

County of San Luis Obispo – Dana Reserve
August 1, 2022
Page 4 of 15

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

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

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

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

In nearly built-out Berkeley, CA, the approach to balancing jobs and housing is to create local jobs rather than to develop new housing.” The city’s First Source program encourages businesses to hire local residents, especially for entry- and intermediate-level jobs, and sponsors vocational training to ensure residents are employment-ready. While the program is voluntary, some 300 businesses have used it to date, placing more than 3,000 city residents in local jobs since it was launched in 1986. When needed, these carrots are matched by sticks, since the city is not shy

SWRCC-2
(cont'd)

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

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

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

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

County of San Luis Obispo – Dana Reserve
August 1, 2022
Page 5 of 15

about negotiating corporate participation in First Source as a condition of approval for development permits.

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

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

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

A. Background Concerning the California Environmental Quality Act

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

Second, CEQA directs public agencies to avoid or reduce environmental damage when possible by requiring alternatives or mitigation measures. CEQA Guidelines § 15002(a)(2) and (3). *See also, Berkeley Jets*, 91 Cal. App. 4th 1344, 1354; *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal. 3d 553; *Laurel Heights Improvement Ass’n v. Regents of the University of California* (1988) 47 Cal. 3d 376, 400. The EIR serves to

↑
SWRCC-2
(cont'd)

↓
SWRCC-3

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

County of San Luis Obispo – Dana Reserve
August 1, 2022
Page 6 of 15

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

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

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

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

SWRCC-3
(cont'd)

County of San Luis Obispo – Dana Reserve
August 1, 2022
Page 7 of 15

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

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

Public health risks related to construction work requires a mandatory finding of significance under CEQA. Construction work has been defined as a Lower to High-risk activity for COVID 19 spread by the Occupations Safety and Health Administration. Recently, several construction sites have been identified as sources of community spread of COVID-19.⁹

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

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

Construction Site Design:

- The Project Site will be limited to two controlled entry points.
- Entry points will have temperature screening technicians taking temperature readings when the entry point is open.
- The Temperature Screening Site Plan shows details regarding access to the Project Site and Project Site logistics for conducting temperature screening.

SWRCC-4

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

County of San Luis Obispo – Dana Reserve
August 1, 2022
Page 8 of 15

- A 48-hour advance notice will be provided to all trades prior to the first day of temperature screening.
- The perimeter fence directly adjacent to the entry points will be clearly marked indicating the appropriate 6-foot social distancing position for when you approach the screening area. Please reference the Apex temperature screening site map for additional details.
- There will be clear signage posted at the project site directing you through temperature screening.
- Provide hand washing stations throughout the construction site.

Testing Procedures:

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



SWRCC-4
(cont'd)

County of San Luis Obispo – Dana Reserve
August 1, 2022
Page 9 of 15

- If the digital thermometer displays a temperature reading above 100.0 degrees Fahrenheit, a second reading will be taken to verify an accurate reading.
- If the second reading confirms an elevated temperature, DHS will instruct the individual that he/she will not be allowed to enter the Project Site. DHS will also instruct the individual to promptly notify his/her supervisor and his/her human resources (HR) representative and provide them with a copy of Annex A.

Planning

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

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

SWRCC-4
(cont'd)

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

County of San Luis Obispo – Dana Reserve
August 1, 2022
Page 10 of 15

II. THE DEIR IS INADEQUATE

A. The DEIR Fails to Support Its Findings with Substantial Evidence

When new information is brought to light showing that an impact previously discussed in the EIR but found to be insignificant with or without mitigation in the EIR’s analysis has the potential for a significant environmental impact supported by substantial evidence, the EIR must consider and resolve the conflict in the evidence. See *Visalia Retail, L.P. v. City of Visalia* (2018) 20 Cal. App. 5th 1, 13, 17; see also *Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal. App. 4th 1099, 1109. While a lead agency has discretion to formulate standards for determining significance and the need for mitigation measures—the choice of any standards or thresholds of significance must be “based to the extent possible on scientific and factual data and an exercise of reasoned judgment based on substantial evidence. CEQA Guidelines § 15064(b); *Cleveland Nat’l Forest Found. v. San Diego Ass’n of Gov’ts* (2017) 3 Cal. App. 5th 497, 515; *Mission Bay Alliance v. Office of Community Inv. & Infrastructure* (2016) 6 Cal. App. 5th 160, 206. And when there is evidence that an impact could be significant, an DEIR cannot adopt a contrary finding without providing an adequate explanation along with supporting evidence. *East Sacramento Partnership for a Livable City v. City of Sacramento* (2016) 5 Cal. App. 5th 281, 302.

In addition, a determination that regulatory compliance will be sufficient to prevent significant adverse impacts must be based on a project-specific analysis of potential impacts and the effect of regulatory compliance. In *Californians for Alternatives to Toxics v. Department of Food & Agric.* (2005) 136 Cal. App. 4th 1, the court set aside an EIR for a statewide crop disease control plan because it did not include an evaluation of the risks to the environment and human health from the proposed program but simply presumed that no adverse impacts would occur from use of pesticides in accordance with the registration and labeling program of the California Department of Pesticide Regulation. See also *Ebbetts Pass Forest Watch v. Department of Forestry & Fire Protection* (2008) 43 Cal. App. 4th 936, 956 (fact that Department of Pesticide Regulation had assessed environmental effects of certain herbicides in general did not excuse failure to assess effects of their use for specific timber harvesting project).

SWRCC-5

County of San Luis Obispo – Dana Reserve
August 1, 2022
Page 11 of 15

1. *The DEIR Omits Critical Supporting Information regarding the Project's Noise Impact and Improperly finds that the Project's Noise Impact would be Less than Significant*

Environmental documents must provide technical details, not merely conclusory findings, to support their determinations. [A]n EIR shall include summarized technical data, maps, plot plans, diagrams, and similar relevant information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public. CEQA Guidelines § 15147; *San Franciscans for Reasonable Growth v. City & County of San Francisco* (1987) 193 Cal.App.3d 1544, 1549 (“All technical data, however, need not be included in the body of report, but may be relegated to appendices [citation omitted] or may be contained in separate source documents which are not formally a part of the document.”). An EIR shall cite all documents used in its preparation” CEQA Guidelines § 15148. An environmental document may incorporate by reference another document so long as the document is made available for inspection to the public. CEQA Guidelines § 15150.

SWRCC-6

The DEIR states that noise impact will be less than significant with mitigation. The DEIR states that the predicted traffic noise for the easternmost portion would exceed the County's exterior noise standard of 60dBA. However, the DEIR does not state what the noise level at that portion is. The modeling provided by the DEIR is 70, 65 or 60 dBA. But without knowing how much, it would be difficult to reach the conclusion that the mitigation would be less than significant.

SWRCC-7

2. *The DEIR Fails to Consider all Feasible Mitigations for Transportation Impacts*

An EIR must identify describe mitigation a proposed project's potentially significant environmental impacts. PRC § 21002.1(a); 21081(a)(1). A project's environmental impacts must be mitigated to a less than significant level or at the least, adopt all feasible mitigation to avoid a project's significant environmental impacts. PRC §§ 21002.1(b), 21081(a)(1); CEQA Guidelines § 15021(a)(2 – 3), 15091(a)(1).

SWRCC-8

CEQA Guidelines section 15064.3(b) requires analysis of a Project's vehicle miles traveled (VMT) impacts as part of the environmental document's transportation impacts analysis. A lead agency must support its findings with substantial evidence,

County of San Luis Obispo – Dana Reserve
August 1, 2022
Page 12 of 15

which includes “facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts.” CEQA Guidelines § 15384(b).

The DEIR states the cumulative VMT with the project would have a VMT of 27 which is well above the San Luis Obispo County threshold of 25.7. The DEIR considers moves to lower the VMT such as pedestrian and bicycle networks as well as offering carpool for trip reductions. However, the DEIR states that even with all feasible VMT reduction measures, the project could not be less than significant. However, the DEIR fails to consider such feasible measures such as VMT bank mitigations. As such the DEIR should be recirculated with more considerations.

The DEIR both fails CEQA’s informational requirements, failing to analyze potential mitigation measures, but also CEQA’s substantive requirements that all feasible mitigation measures be adopted. For example, in April of 2020, Fehr & Peers (who happens to be a technical consultant on this particular environmental document) and the Western Riverside Council of Governments (“WRCOG”) published “VMT Mitigation Through Fees, Banks & Exchanges: Understanding New Mitigation Approaches.”¹¹

Oddly enough, the DEIR fails to consider any of the mitigation approaches. WRCOG proposes a number of regional VMT mitigation strategies including VMT-based Transportation Impact Fees, VMT Mitigation Exchanges and VMT Mitigation Banks.¹² These approaches are well documented and have already adopted in a number of jurisdictions, including in WRCOG which the City is a member agency of.¹³

In addition, there are many well-documented project level VMT mitigation strategies, none of which are discussed as potential mitigation measures in the DEIR. Fehr & Peers in another study conducted for WRCOG suggested a number of project-level VMT mitigation measures that would be effective in rural or suburban settings such as

↑ SWRCC-8
(cont'd)

SWRCC-9

SWRCC-10

SWRCC-11
↓

¹¹ Western Riverside Council of Governments (2020) VMT Mitigation Through Fees, Banks & Exchanges, Understanding New Mitigation Approaches, available at https://www.fehrandpeers.com/wp-content/uploads/2020/04/VMT-Fees_Exchanges_Banks-White-Paper_Apr2020.pdf.

¹² *Id.* at pp. 16 – 17.

¹³ Neil Peacock, Senior Environmental Planner, Caltrans (2017) Working Paper: The Potential for Regional Transportation Impact Mitigation Fee Programs and Mitigation Banks to Help Streamline the Implementation of SB 743 at pp. 2 – 3, available at <https://static1.squarespace.com/static/5b96d09a3c3a53da0e1ba210/t/5e5ec5cf5876f47000915ddd/1583269327880/VMT+Mitigation+Precedents+Peacock+March+2017.pdf>

County of San Luis Obispo – Dana Reserve
August 1, 2022
Page 13 of 15

in Cities in the WRCOG, including diversifying land uses, providing pedestrian network improvements, and traffic calming measures among many other proposals.¹⁴

Finally, as stated previously, local skilled and trained workforce requirements can also significantly reduce vehicle miles traveled and associated air pollutant emissions.

The DEIR needs to be revised to reflect substantive consideration of the many measures available to mitigate transportation impacts, including the use of local skilled professions on all construction projects, not just the handful of measures selected for discussion in the DEIR. Furthermore, the DEIR must be revised to require the application all feasible measures to reduce the Project’s significant transportation impacts.

3. *The DEIR’s Air Quality Mitigation Fails to Consider All Feasible Mitigations*

The DEIR states the operational emissions for the Project of ROG and NO_x would be 144.9. The DEIR also states the SLOAPCD Significance Threshold is 25. While the DEIR does admit the daily operations emissions is significant and unavoidable, this is still almost six times the threshold. While the DEIR states a series of mitigations such as installation of suppressants, it fails to consider a reduction in size of the Project as a method to reduce ROG and NO_x impacts.

II. **THE PROJECT VIOLATES THE STATE PLANNING AND ZONING LAW AS WELL AS THE CITY’S GENERAL PLAN**

A. Background Regarding the State Planning and Zoning Law

Each California city and county must adopt a comprehensive, long-term general plan governing development. *Napa Citizens for Honest Gov. v. Napa County Bd. of Supervisors* (2001) 91 Cal. App.4th 342, 352, citing Gov. Code §§ 65030, 65300. The general plan sits at the top of the land use planning hierarchy (See *DeVita v. County of Napa* (1995) 9 Cal. App. 4th 763, 773), and serves as a “constitution” or “charter” for all future development. *Lesher Communications, Inc. v. City of Walnut Creek* (1990) 52 Cal. App. 3d 531, 540.

↑ SWRCC-11
(cont’d)

↑ SWRCC-12

↑ SWRCC-13

↑ SWRCC-14

↑ SWRCC-15

¹⁴ Technical Memorandum from Ronald T. Milam, AICP, PTP and Jason Pack, PE to Chris Gray (WRCOG), Chris Tzeng (WRCOG), Sarah Dominguez (SCAG) and Mike Gainor (SCAG) (February 26, 2019) SB 743 Implementation TDM Strategy Assessment, available at <https://www.febrandpeers.com/wp-content/uploads/2019/12/TDM-Strategies-Evaluation.pdf>

County of San Luis Obispo – Dana Reserve
August 1, 2022
Page 14 of 15

General plan consistency is “the linchpin of California’s land use and development laws; it is the principle which infused the concept of planned growth with the force of law.” See *Debottari v. Norco City Council* (1985) 171 Cal. App. 3d 1204, 1213.

State law mandates two levels of consistency. First, a general plan must be internally or “horizontally” consistent: its elements must “comprise an integrated, internally consistent and compatible statement of policies for the adopting agency.” (See Gov. Code § 65300.5; *Sierra Club v. Bd. of Supervisors* (1981) 126 Cal. App. 3d 698, 704.) A general plan amendment thus may not be internally inconsistent, nor may it cause the general plan as a whole to become internally inconsistent. See *DeVita*, 9 Cal. App. 4th at 796 fn. 12.

Second, state law requires “vertical” consistency, meaning that zoning ordinances and other land use decisions also must be consistent with the general plan. (See Gov. Code § 65860(a)(2) [land uses authorized by zoning ordinance must be “compatible with the objectives, policies, general land uses, and programs specified in the [general] plan.”]; see also *Neighborhood Action Group v. County of Calaveras* (1984) 156 Cal. App. 3d 1176, 1184.) A zoning ordinance that conflicts with the general plan or impedes achievement of its policies is invalid and cannot be given effect. See *Lesher*, 52 Cal. App. 3d at 544.

State law requires that all subordinate land use decisions, including conditional use permits, be consistent with the general plan. See Gov. Code § 65860(a)(2); *Neighborhood Action Group*, 156 Cal. App. 3d at 1184.

A project cannot be found consistent with a general plan if it conflicts with a general plan policy that is “fundamental, mandatory, and clear,” regardless of whether it is consistent with other general plan policies. See *Endangered Habitats League v. County of Orange* (2005) 131 Cal. App. 4th 777, 782-83; *Families Unafraid to Uphold Rural El Dorado County v. Bd. of Supervisors* (1998) 62 Cal. App. 4th 1332, 1341-42 (“FUTURE”).

Moreover, even in the absence of such a direct conflict, an ordinance or development project may not be approved if it interferes with or frustrates the general plan’s policies and objectives. See *Napa Citizens*, 91 Cal. App. 4th at 378-79; see also *Lesher*, 52 Cal. App. 3d at 544 (zoning ordinance restricting development conflicted with growth-oriented policies of general plan).



SWRCC-15
(cont'd)

County of San Luis Obispo – Dana Reserve
August 1, 2022
Page 15 of 15

1. *The DEIR is Required to Review the Project’s Consistency with Regional Housing Plans, Sustainable Community Strategy and Regional Transportation Plans*

CEQA Guidelines section 15125(d) requires that an environmental document “discuss any inconsistencies between the proposed project and applicable general plans, specific plans and regional plans. *See also Golden Door Properties, LLC v. County of San Diego* (2020) 50 Cal. App. 5th 467, 543. The DEIR should thoroughly evaluate the consistency of this Project with the City’s General Plan, City’s Regional Housing Needs Assessment targets, Sustainable Community Strategy and Regional Transportation Plan. The DEIR fails to analyze the Project’s consistency with any of these applicable plans.


SWRCC-16

III. CONCLUSION

SWRCC request that the City revise and recirculate the DEIR for public comment to address the aforementioned concerns. If the City has any questions or concerns, feel free to contact my Office.

SWRCC-17

Sincerely,



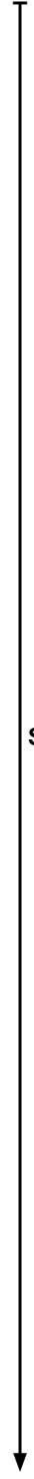
Mitchell M. Tsai
Attorneys for Southwest Regional Council of Carpenters

Attached:

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

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

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



SWRCC-18

EXHIBIT A



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

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

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

March 8, 2021

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

Subject: Local Hire Requirements and Considerations for Greenhouse Gas Modeling

Dear Mr. Tsai,

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

Worker Trips and Greenhouse Gas Calculations

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

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

¹ “California Emissions Estimator Model.” CAPCOA, 2017, *available at*: <http://www.aqmd.gov/caleemod/home>.

² “California Emissions Estimator Model.” CAPCOA, 2017, *available at*: <http://www.aqmd.gov/caleemod/home>.

³ “CalEEMod User’s Guide.” CAPCOA, November 2017, *available at*: http://www.aqmd.gov/docs/default-source/caleemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4, p. 34.

SWRCC-18
(cont’d)

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

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

$$\text{VMT}_d = \Sigma(\text{Average Daily Trip Rate}_i * \text{Average Overall Trip Length}_i)_n$$

Where:

n = Number of land uses being modeled.”⁵

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

$$\text{Emissions}_{\text{pollutant}} = \text{VMT} * \text{EF}_{\text{running,pollutant}}$$

Where:

Emissions_{pollutant} = emissions from vehicle running for each pollutant

VMT = vehicle miles traveled

EF_{running,pollutant} = emission factor for running emissions.”⁶

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

SWRCC-18
(cont'd)

Default Worker Trip Parameters and Potential Local Hire Requirements

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

⁴ “Appendix A Calculation Details for CalEEMod.” CAPCOA, October 2017, available at: http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 14-15.

⁵ “Appendix A Calculation Details for CalEEMod.” CAPCOA, October 2017, available at: http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 23.

⁶ “Appendix A Calculation Details for CalEEMod.” CAPCOA, October 2017, available at: http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 15.

⁷ “CalEEMod User’s Guide.” CAPCOA, November 2017, available at: http://www.aqmd.gov/docs/default-source/caleemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4, p. 34.

⁸ CalEEMod User Guide, available at: <http://www.caleemod.com/>, p. 1, 9.

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

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

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

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

SWRCC-18
(cont'd)

⁹ “CalEEMod User’s Guide.” CAPCOA, November 2017, available at: http://www.aqmd.gov/docs/default-source/caleemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4, p. 34.

¹⁰ “Appendix A Calculation Details for CalEEMod.” CAPCOA, October 2017, available at: http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 15.

¹¹ “Appendix A Calculation Details for CalEEMod.” CAPCOA, October 2017, available at: http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 14.

¹² “Appendix A Calculation Details for CalEEMod.” CAPCOA, October 2017, available at: http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 21.

¹³ “Appendix D Default Data Tables.” CAPCOA, October 2017, available at: http://www.aqmd.gov/docs/default-source/caleemod/05_appendix-d2016-3-2.pdf?sfvrsn=4, p. D-84 – D-86.

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

Practical Application of a Local Hire Requirement and Associated Impact

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

Local Hire Provision Net Change	
Without Local Hire Provision	
Total Construction GHG Emissions (MT CO ₂ e)	3,623
Amortized Construction GHG Emissions (MT CO ₂ e/year)	120.77
With Local Hire Provision	
Total Construction GHG Emissions (MT CO ₂ e)	3,024
Amortized Construction GHG Emissions (MT CO ₂ e/year)	100.80
% Decrease in Construction-related GHG Emissions	17%

SWRCC-18
(cont’d)

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

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

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

Disclaimer

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

Sincerely,



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



Paul E. Rosenfeld, Ph.D.

SWRCC-18
(cont'd)

Attachment A

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

SWRCC-18
(cont'd)

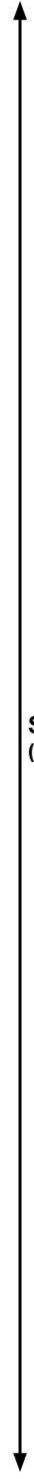
Air District	San Diego	16.8	10.8
Air District	San Joaquin	16.8	10.8
Air District	San Luis Obispo	13	13
Air District	Santa Barbara	8.3	8.3
Air District	Shasta County	16.8	10.8
Air District	Siskiyou County	16.8	10.8
Air District	South Coast	19.8	14.7
Air District	Tehama County	16.8	10.8
Air District	Tuolumne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

SWRCC-18
 (cont'd)

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

SWRCC-18
 (cont'd)

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



SWRCC-18
 (cont'd)

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

1.0 Project Characteristics

1.1 Land Usage

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

1.2 Other Project Characteristics

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

1.3 User Entered Comments & Non-Default Data

SWRCC-18
 (cont'd)

Project Characteristics - Consistent with the DEIR's model.
 Land Use - See SWAPE comment regarding residential and retail land uses.
 Construction Phase - See SWAPE comment regarding individual construction phase lengths.
 Demolition - Consistent with the DEIR's model. See SWAPE comment regarding demolition.
 Vehicle Trips - Saturday trips consistent with the DEIR's model. See SWAPE comment regarding weekday and Sunday trips.
 Woodstoves - Woodstoves and wood-burning fireplaces consistent with the DEIR's model. See SWAPE comment regarding gas fireplaces.
 Energy Use -
 Construction Off-road Equipment Mitigation - See SWAPE comment on construction-related mitigation.
 Area Mitigation - See SWAPE comment regarding operational mitigation measures.
 Water Mitigation - See SWAPE comment regarding operational mitigation measures.

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

SWRCC-18
(cont'd)

tblVehicleTrips	SU_TR	5.95	3.20
tblVehicleTrips	SU_TR	72.16	57.65
tblVehicleTrips	SU_TR	25.24	6.39
tblVehicleTrips	WD_TR	5.59	5.83
tblVehicleTrips	WD_TR	5.65	4.13
tblVehicleTrips	WD_TR	11.03	6.41
tblVehicleTrips	WD_TR	127.15	65.80
tblVehicleTrips	WD_TR	8.17	3.84
tblVehicleTrips	WD_TR	89.95	62.64
tblVehicleTrips	WD_TR	42.70	9.43
tblWoodstoves	NumberCatalytic	1.25	0.00
tblWoodstoves	NumberCatalytic	48.75	0.00
tblWoodstoves	NumberNoncatalytic	1.25	0.00
tblWoodstoves	NumberNoncatalytic	48.75	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00

2.0 Emissions Summary

SWRCC-18
(cont'd)

**2.1 Overall Construction
 Unmitigated Construction**

Year	tons/yr										MT/yr						
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
2021	0.1713	1.8242	1.1662	2.4000e-003	0.4169	0.0817	0.4986	0.1795	0.0754	0.2549	0.0000	213.1969	213.1969	0.0601	0.0000	0.0000	214.6993
2022	0.6904	4.1142	6.1625	0.0189	1.3058	0.1201	1.4259	0.3460	0.1128	0.4588	0.0000	1,721,682 ⁶	1,721,682 ⁶	0.1294	0.0000	0.0000	1,724,918 ⁷
2023	0.6148	3.3649	5.6747	0.0178	1.1963	0.0986	1.2959	0.3203	0.0935	0.4138	0.0000	1,637,529 ⁵	1,637,529 ⁵	0.1185	0.0000	0.0000	1,630,462 ⁵
2024	4.1619	0.1335	0.2810	5.9000e-004	0.0325	6.4700e-003	0.0390	8.6300e-003	6.0400e-003	0.0147	0.0000	52,9078	52,9078	8.0200e-003	0.0000	0.0000	53,1082
Maximum	4.1619	4.1142	6.1625	0.0189	1.3058	0.1201	1.4259	0.3460	0.1128	0.4588	0.0000	1,721,682 ⁶	1,721,682 ⁶	0.1294	0.0000	0.0000	1,724,918 ⁷

SWRCC-18
(cont'd)

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

**2.1 Overall Construction
 Mitigated Construction**

Year	tons/yr										MT/yr					
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
2021	0.1713	1.8242	1.1662	2.4000e-003	0.4169	0.0817	0.4986	0.1795	0.0754	0.2549	0.0000	213.1967	213.1967	0.0601	0.0000	214.6991
2022	0.6904	4.1142	6.1625	0.0189	1.3058	0.1201	1.4259	0.3460	0.1128	0.4588	0.0000	1,721.682	1,721.682	0.1294	0.0000	1,724.918
2023	0.6148	3.3648	5.6747	0.0178	1.1963	0.0986	1.2959	0.3203	0.0935	0.4138	0.0000	1,627.529	1,627.529	0.1185	0.0000	1,630.482
2024	4.1619	0.1335	0.2810	5.9000e-004	0.0325	6.4700e-003	0.0390	8.6300e-003	0.0147	0.0147	0.0000	52.9077	52.9077	8.0200e-003	0.0000	53.1082
Maximum	4.1619	4.1142	6.1625	0.0189	1.3058	0.1201	1.4259	0.3460	0.1128	0.4588	0.0000	1,721.682	1,721.682	0.1294	0.0000	1,724.918

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

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

SWRCC-18
(cont'd)

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

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

**2.2 Overall Operational
 Unmitigated Operational**

Category	tons/yr										MT/yr					
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Area	5.1437	0.2950	10.3804	1.6700e-003		0.0714	0.0714		0.0714	0.0714	0.0000	220.9670	220.9670	0.0201	3.7400e-003	222.5835
Energy	0.1388	1.2312	0.7770	7.6200e-003		0.0986	0.0986		0.0986	0.0986	0.0000	3.896073	3.896073	0.1303	0.0468	3.913283
Mobile	1.5857	7.9862	19.1634	0.0821	7.7979	0.0580	7.8559	2.0895	0.0539	2.1434	0.0000	7.620498	7.620498	0.3407	0.0000	7.623016
Waste						0.0000	0.0000		0.0000	0.0000	207.8079	0.0000	207.8079	12.2811	0.0000	514.8354
Water						0.0000	0.0000		0.0000	0.0000	29.1632	556.6420	585.8052	3.0183	0.0755	683.7567
Total	6.8692	9.5223	30.3407	0.0914	7.7979	0.2260	8.0240	2.0895	0.2219	2.3114	236.8712	12,294.1807	12,531.1519	15.7904	0.1260	12,963.4751

SWRCC-18
(cont'd)

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

**2.2 Overall Operational
 Mitigated Operational**

Category	Tons/yr										MT/yr					
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Area	5.1437	0.2950	10.3804	1.6700e-003	0.0714	0.0714	0.0714	0.0714	0.0714	0.0714	0.0000	220.9670	220.9670	0.0201	3.7400e-003	222.5635
Energy	0.1398	1.2312	0.7770	7.6200e-003	0.0966	0.0966	0.0966	0.0966	0.0966	0.0966	0.0000	3,896.0732	3,896.0732	0.1303	0.0468	3,913.2633
Mobile	1.5857	7.9862	19.1834	0.0821	7.7979	0.0580	7.8559	2.0895	0.0539	2.1434	0.0000	7,620.4886	7,620.4886	0.3407	0.0000	7,629.0162
Waste					0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	207.8079	0.0000	207.8079	12.2811	0.0000	514.8364
Water					0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	29.1632	556.6420	585.8052	3.0183	0.0755	683.7567
Total	6.8692	9.5223	30.3407	0.0914	7.7979	0.2260	8.0240	2.0895	0.2219	2.3114	236.8712	12,294.1807	12,531.1519	15.7904	0.1260	12,963.4751

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

3.0 Construction Detail

Construction Phase

SWRCC-18
(cont'd)

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

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 112.5

Acres of Paving: 0

Residential Indoor: 2,025,000; Residential Outdoor: 675,000; Non-Residential Indoor: 325,400; Non-Residential Outdoor: 108,800; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

**SWRCC-18
(cont'd)**

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

Trips and VMT

SWRCC-18
(cont'd)

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

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

3.1 Mitigation Measures Construction

3.2 Demolition - 2021

Unmitigated Construction On-Site

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

SWRCC-18
(cont'd)

3.2 Demolition - 2021
Unmitigated Construction Off-Site

Category	tons/yr											MT/yr				
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	1.9300e-003	0.0634	0.0148	1.8000e-004	3.9400e-003	1.9000e-004	4.1300e-003	1.0800e-003	1.8000e-004	1.2600e-003	0.0000	17.4586	17.4586	1.2100e-003	0.0000	17.4869
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	9.7000e-004	7.5000e-004	6.5100e-003	2.0000e-005	2.4700e-003	2.0000e-005	2.4900e-003	6.5000e-004	2.0000e-005	6.7000e-004	0.0000	2.2251	2.2251	7.0000e-005	0.0000	2.2267
Total	2.9000e-003	0.0641	0.0233	2.0000e-004	6.4100e-003	2.1000e-004	6.6200e-003	1.7300e-003	2.0000e-004	1.9300e-003	0.0000	19.6816	19.6816	1.2800e-003	0.0000	19.7136

Mitigated Construction On-Site

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

SWRCC-18
(cont'd)

3.2 Demolition - 2021

Mitigated Construction Off-Site

Category	tons/yr										MT/yr					
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	1.9300e-003	0.0634	0.0148	1.8000e-004	3.9400e-003	1.9000e-004	4.1300e-003	1.0600e-003	1.8000e-004	1.2600e-003	0.0000	17.4566	17.4566	1.2100e-003	0.0000	17.4669
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	9.7000e-004	7.5000e-004	6.5100e-003	2.0000e-005	2.4700e-003	2.0000e-005	2.4900e-003	6.5000e-004	2.0000e-005	6.7000e-004	0.0000	2.2251	2.2251	7.0000e-005	0.0000	2.2267
Total	2.9000e-003	0.0641	0.0233	2.0000e-004	6.4100e-003	2.1000e-004	6.6200e-003	1.7300e-003	2.0000e-004	1.9300e-003	0.0000	19.6816	19.6816	1.2800e-003	0.0000	19.7136

3.3 Site Preparation - 2021

Unmitigated Construction On-Site

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

SWRCC-18
(cont'd)

**3.3 Site Preparation - 2021
 Unmitigated Construction Off-Site**

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

Mitigated Construction On-Site

Category	tons/yr										MT/yr					
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Fugitive Dust					0.1807	0.0000	0.1807	0.0983	0.0000	0.0983	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0389	0.4050	0.2115	3.8000e-004		0.0204	0.0204		0.0188	0.0188	0.0000	33.4357	33.4357	0.0108	0.0000	33.7060
Total	0.0389	0.4050	0.2115	3.8000e-004	0.1807	0.0204	0.2011	0.0983	0.0188	0.1181	0.0000	33.4357	33.4357	0.0108	0.0000	33.7060

SWRCC-18
(cont'd)

3.3 Site Preparation - 2021
Mitigated Construction Off-Site

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

3.4 Grading - 2021
Unmitigated Construction On-Site

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

SWRCC-18
(cont'd)

3.4 Grading - 2021
Unmitigated Construction Off-Site

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

Mitigated Construction On-Site

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

SWRCC-18
(cont'd)

3.4 Grading - 2021

Mitigated Construction Off-Site

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

3.4 Grading - 2022

Unmitigated Construction On-Site

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

SWRCC-18
(cont'd)

3.4 Grading - 2022
Unmitigated Construction Off-Site

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

Mitigated Construction On-Site

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

SWRCC-18
(cont'd)

3.4 Grading - 2022

Mitigated Construction Off-Site

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

3.5 Building Construction - 2022

Unmitigated Construction On-Site

Category	tons/yr										MT/yr					
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Off-Road	0.2158	1.9754	2.0700	3.4100e-003		0.1023	0.1023		0.0963	0.0963	0.0000	293.1324	283.1324	0.0702	0.0000	294.8881
Total	0.2158	1.9754	2.0700	3.4100e-003		0.1023	0.1023		0.0963	0.0963	0.0000	293.1324	283.1324	0.0702	0.0000	294.8881

SWRCC-18
(cont'd)

**3.5 Building Construction - 2022
 Unmitigated Construction Off-Site**

Category	tons/yr										MT/yr					
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0527	1.6961	0.4580	4.5500e-003	0.1140	3.1800e-003	0.1171	0.0329	3.0400e-003	0.0359	0.0000	441.9835	441.9835	0.0264	0.0000	442.6435
Worker	0.4088	0.3066	3.5305	0.0107	1.1103	8.8700e-003	1.1192	0.2949	8.1700e-003	0.3031	0.0000	966.8117	966.8117	0.0266	0.0000	967.4773
Total	0.4616	2.0027	3.9885	0.0152	1.2243	0.0121	1.2363	0.3278	0.0112	0.3390	0.0000	1,408.795	1,408.795	0.0530	0.0000	1,410.120

Mitigated Construction On-Site

Category	tons/yr										MT/yr					
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Off-Road	0.2158	1.9754	2.0700	3.4100e-003		0.1023	0.1023		0.0963	0.0963	0.0000	293.1321	283.1321	0.0702	0.0000	294.8877
Total	0.2158	1.9754	2.0700	3.4100e-003		0.1023	0.1023		0.0963	0.0963	0.0000	293.1321	283.1321	0.0702	0.0000	294.8877

SWRCC-18
(cont'd)

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

3.5 Building Construction - 2022
Mitigated Construction Off-Site

Category	tons/yr										MT/yr					
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0527	1.6961	0.4580	4.5500e-003	0.1140	3.1800e-003	0.1171	0.0329	3.0400e-003	0.0359	0.0000	441.9835	441.9835	0.0264	0.0000	442.6435
Worker	0.4088	0.3066	3.5305	0.0107	1.1103	8.8700e-003	1.1192	0.2949	8.1700e-003	0.3031	0.0000	966.8117	966.8117	0.0266	0.0000	967.4773
Total	0.4616	2.0027	3.9885	0.0152	1.2243	0.0121	1.2363	0.3278	0.0112	0.3390	0.0000	1,408.795	1,408.795	0.0530	0.0000	1,410.120

3.5 Building Construction - 2023
Unmitigated Construction On-Site

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

SWRCC-18
(cont'd)

3.5 Building Construction - 2023
Unmitigated Construction Off-Site

Category	tons/yr										MT/yr					
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0382	1.2511	0.4011	4.3000e-003	1.4600e-003	0.1127	0.0321	1.4000e-003	0.0335	0.0335	0.0000	417.9930	417.9930	0.0228	0.0000	418.5624
Worker	0.3753	0.2708	3.1686	0.0101	1.0840	8.4100e-003	1.0824	0.2879	7.7400e-003	0.2857	0.0000	909.3439	909.3439	0.0234	0.0000	909.9291
Total	0.4135	1.5218	3.5707	0.0144	1.1953	8.8700e-003	1.2051	0.3200	9.1400e-003	0.3292	0.0000	1,327.3369	1,327.3369	0.0462	0.0000	1,328.4916

Mitigated Construction On-Site

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

SWRCC-18
(cont'd)

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

3.5 Building Construction - 2023
Mitigated Construction Off-Site

Category	tons/yr										MT/yr					
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0382	1.2511	0.4011	4.3000e-003	1.4600e-003	0.1127	0.0321	1.4000e-003	0.0335	0.0000	417.9930	417.9930	0.0228	0.0000	0.0000	418.5624
Worker	0.3753	0.2708	3.1686	0.0101	1.0840	8.4100e-003	1.0824	7.7400e-003	0.2857	0.0000	909.3439	909.3439	0.0234	0.0000	0.0000	909.9291
Total	0.4135	1.5218	3.5707	0.0144	1.1953	8.8700e-003	1.2051	9.1400e-003	0.3292	0.0000	1,327.3369	1,327.3369	0.0462	0.0000	0.0000	1,328.4916

3.6 Paving - 2023
Unmitigated Construction On-Site

Category	tons/yr										MT/yr					
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Off-Road	6.7100e-003	0.0653	0.0948	1.5000e-004	3.3200e-003	3.3200e-003	3.3200e-003	3.0500e-003	3.0500e-003	3.0500e-003	0.0000	13.0175	13.0175	4.2100e-003	0.0000	13.1227
Paving	0.0000				0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	6.7100e-003	0.0653	0.0948	1.5000e-004	3.3200e-003	3.3200e-003	3.3200e-003	3.0500e-003	3.0500e-003	3.0500e-003	0.0000	13.0175	13.0175	4.2100e-003	0.0000	13.1227

SWRCC-18
(cont'd)

3.6 Paving - 2023
Unmitigated Construction Off-Site

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

Mitigated Construction On-Site

Category	tons/yr											MT/yr				
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Off-Road	6.7100e-003	0.0653	0.0948	1.5000e-004	3.3200e-003	3.3200e-003	3.3200e-003	3.0500e-003	3.0500e-003	3.0500e-003	0.0000	13.0175	13.0175	4.2100e-003	0.0000	13.1227
Paving	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	6.7100e-003	0.0653	0.0948	1.5000e-004	3.3200e-003	3.3200e-003	3.3200e-003	3.0500e-003	3.0500e-003	3.0500e-003	0.0000	13.0175	13.0175	4.2100e-003	0.0000	13.1227

SWRCC-18
(cont'd)

3.6 Paving - 2023

Mitigated Construction Off-Site

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

3.6 Paving - 2024

Unmitigated Construction On-Site

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

SWRCC-18
(cont'd)

3.6 Paving - 2024
Unmitigated Construction Off-Site

Category	tons/yr										MT/yr					
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.9000e-004	4.1000e-004	4.9200e-003	2.0000e-005	1.8100e-003	1.0000e-005	1.8200e-003	4.8000e-004	1.0000e-005	4.9000e-004	0.0000	1.4687	1.4687	4.0000e-005	0.0000	1.4706
Total	5.9000e-004	4.1000e-004	4.9200e-003	2.0000e-005	1.8100e-003	1.0000e-005	1.8200e-003	4.8000e-004	1.0000e-005	4.9000e-004	0.0000	1.4687	1.4687	4.0000e-005	0.0000	1.4706

Mitigated Construction On-Site

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

SWRCC-18
(cont'd)

3.6 Paving - 2024

Mitigated Construction Off-Site

Category	tons/yr											MT/yr				
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.9000e-004	4.1000e-004	4.9200e-003	2.0000e-005	1.8100e-003	1.0000e-005	1.8200e-003	4.8000e-004	1.0000e-005	4.9000e-004	0.0000	1.4687	1.4687	4.0000e-005	0.0000	1.4706
Total	5.9000e-004	4.1000e-004	4.9200e-003	2.0000e-005	1.8100e-003	1.0000e-005	1.8200e-003	4.8000e-004	1.0000e-005	4.9000e-004	0.0000	1.4687	1.4687	4.0000e-005	0.0000	1.4706

3.7 Architectural Coating - 2024

Unmitigated Construction On-Site

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

SWRCC-18
(cont'd)

3.7 Architectural Coating - 2024
Unmitigated Construction Off-Site

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

Mitigated Construction On-Site

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

SWRCC-18
(cont'd)

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

3.7 Architectural Coating - 2024
Mitigated Construction Off-Site

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

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

SWRCC-18
(cont'd)

Category	tons/yr											MT/yr				
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Mitigated	1.5857	7.9862	19.1834	0.0821	7.7979	0.0580	7.8559	2.0895	0.0539	2.1434	0.0000	7,620,498	7,620,498	0.3407	0.0000	7,629,016
Unmitigated	1.5857	7.9862	19.1834	0.0821	7.7979	0.0580	7.8559	2.0895	0.0539	2.1434	0.0000	7,620,498	7,620,498	0.3407	0.0000	7,629,016

4.2 Trip Summary Information

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

4.3 Trip Type Information

SWRCC-18
(cont'd)

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

Land Use	Miles						Trip %						Trip Purpose %			
	H-W or C-W	H-S or C-C	H-O or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-C	H-O or C-NW	Primary	Diverted	Pass-by	
Apartments Low Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3							
Apartments Mid Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3							
General Office Building	16.60	8.40	6.90	33.00	48.00	19.00	77	19	4							
High Turnover (Sit Down	16.60	8.40	6.90	8.50	72.50	19.00	37	20	43							
Hotel	16.60	8.40	6.90	19.40	61.60	19.00	58	38	4							
Quality Restaurant	16.60	8.40	6.90	12.00	66.00	19.00	38	18	44							
Regional Shopping Center	16.60	8.40	6.90	16.30	64.70	19.00	54	35	11							

4.4 Fleet Mix

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

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

SWRCC-18
(cont'd)

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

SWRCC-18
(cont'd)

**5.2 Energy by Land Use - NaturalGas
 Unmitigated**

Land Use	NaturalGas Use kBTU/yr	tons/yr										MT/yr						
		ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Apartments Low Rise	408494	2.2000e-003	0.0188	8.0100e-003	1.2000e-004	1.5200e-003	1.5200e-003	1.5200e-003	0.0487	0.0487	0.0487	1.5200e-003	0.0000	21.7988	21.7988	4.2000e-004	4.0000e-004	21.9284
Apartments Mid Rise	1.50512e+007	0.0704	0.6018	0.2561	3.6400e-003	0.0487	0.0487	0.0487	0.0487	0.0487	0.0487	0.0000	696.9989	696.9989	0.0134	0.0128	701.1408	
General Office Building	468450	2.5300e-003	0.0230	0.0193	1.4000e-004	1.7500e-003	1.7500e-003	1.7500e-003	0.0310	0.0310	0.0310	0.0000	24.9883	24.9883	4.8000e-004	4.6000e-004	25.1468	
High Turnover (Sit Down Restaurant)	8.30736e+006	0.0448	0.4072	0.3421	2.4400e-003	0.0310	0.0310	0.0310	0.0310	0.0310	0.0310	0.0000	443.3124	443.3124	8.5000e-003	8.1300e-003	445.9468	
Hotel	1.74095e+006	9.3900e-003	0.0853	0.0717	5.1000e-004	6.4900e-003	6.4900e-003	6.4900e-003	0.0310	0.0310	0.0310	0.0000	92.9036	92.9036	1.7800e-003	1.7000e-003	93.4557	
Quality Restaurant	1.64000e+006	9.8500e-003	0.0905	0.0760	5.4000e-004	6.8800e-003	6.8800e-003	6.8800e-003	0.0310	0.0310	0.0310	0.0000	96.5139	96.5139	1.8900e-003	1.8100e-003	98.0993	
Regional Shopping Center	91840	5.0000e-004	4.5000e-003	3.7800e-003	3.0000e-005	3.4000e-004	3.4000e-004	3.4000e-004	0.0000	0.0000	0.0000	0.0000	4.9009	4.9009	9.0000e-005	9.0000e-005	4.8301	
Total		0.1398	1.2312	0.7770	7.6200e-003	0.0966	0.0966	0.0966	0.0966	0.0966	0.0966	0.0000	1,383.4268	1,383.4268	0.0285	0.0254	1,391.6478	

SWRCC-18
(cont'd)

5.2 Energy by Land Use - NaturalGas Mitigated

Land Use	NaturalGas Use kBTU/yr	tons/yr										MT/yr					
		ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Apartments Low Rise	408494	2.2000e-003	0.0188	8.0100e-003	1.2000e-004	1.5200e-003	1.5200e-003	1.5200e-003	0.0487	1.5200e-003	1.5200e-003	0.0000	21.7988	21.7988	4.2000e-004	4.0000e-004	21.9284
Apartments Mid Rise	1.50512e+007	0.0704	0.6018	0.2561	3.6400e-003	0.0487	0.0487	0.0487	0.0487	0.0487	0.0000	696.9989	696.9989	0.0134	0.0128	701.1408	
General Office Building	468450	2.5300e-003	0.0230	0.0193	1.4000e-004	1.7500e-003	1.7500e-003	1.7500e-003	0.0310	1.7500e-003	0.0000	24.9883	24.9883	4.8000e-004	4.6000e-004	25.1468	
High Turnover (Sit Down Restaurant)	8.30736e+006	0.0448	0.4072	0.3421	2.4400e-003	0.0310	0.0310	0.0310	0.0310	0.0310	0.0000	443.3124	443.3124	8.5000e-003	8.1300e-003	445.9468	
Hotel	1.74095e+006	9.3900e-003	0.0853	0.0717	5.1000e-004	6.4900e-003	6.4900e-003	6.4900e-003	0.0310	6.4900e-003	0.0000	92.9036	92.9036	1.7800e-003	1.7000e-003	93.4557	
Quality Restaurant	1.64000e+006	9.8500e-003	0.0905	0.0760	5.4000e-004	6.8800e-003	6.8800e-003	6.8800e-003	0.0310	6.8800e-003	0.0000	96.5139	96.5139	1.8900e-003	1.8100e-003	98.0993	
Regional Shopping Center	91840	5.0000e-004	4.5000e-003	3.7800e-003	3.0000e-005	3.4000e-004	3.4000e-004	3.4000e-004	0.0000	3.4000e-004	0.0000	4.9009	4.9009	9.0000e-005	9.0000e-005	4.8301	
Total		0.1398	1.2312	0.7770	7.6200e-003	0.0966	0.0966	0.0966	0.0966	0.0966	0.0000	1,383.4268	1,383.4268	0.0285	0.0254	1,391.6478	

SWRCC-18
(cont'd)

5.3 Energy by Land Use - Electricity
Unmitigated

Land Use	Electricity Use kWh/yr	Total CO2	CH4	N2O	CO2e
Apartment Low Rise	106010	33.7770	1.3900e-003	2.9000e-004	33.8978
Apartment Mid Rise	3.84697e+006	1,257,587.9	0.0519	0.0107	1,262,066.9
General Office Building	584550	186.2502	7.6800e-003	1.5900e-003	186.9165
High Turnover (Sit Down Restaurant)	1.58904e+006	506.3022	0.0209	4.3200e-003	508.1135
Hotel	560308	175.3389	7.2400e-003	1.5000e-003	175.9672
Quality Restaurant	353120	112.5116	4.6500e-003	9.6000e-004	112.9141
Regional Shopping Center	756000	240.8778	9.9400e-003	2.0600e-003	241.7395
Total		2,512,646.5	0.1037	0.0215	2,521,635.6

SWRCC-18
(cont'd)

5.3 Energy by Land Use - Electricity Mitigated

Land Use	Electricity Use kWh/yr	Total CO2	CH4	N2O	CO2e
Apartment Low Rise	106010	33.7770	1.3900e-003	2.9000e-004	33.8978
Apartment Mid Rise	3,84697e+006	1,257,587.9	0.0519	0.0107	1,262,066.9
General Office Building	584550	186.2502	7.6800e-003	1.5800e-003	186.9165
High Turnover (Sit Down Restaurant)	1,58904e+006	506.3022	0.0209	4.3200e-003	508.1135
Hotel	503008	175.3399	7.2400e-003	1.5000e-003	175.9672
Quality Restaurant	353120	112.5110	4.6500e-003	9.6000e-004	112.9141
Regional Shopping Center	756000	240.8778	9.9400e-003	2.0600e-003	241.7395
Total		2,512,646.5	0.1037	0.0215	2,521,635.6

6.0 Area Detail

6.1 Mitigation Measures Area

SWRCC-18
(cont'd)

Category	Tons/yr											MT/yr				
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Mitigated	5.1437	0.2950	10.3804	1.6700e-003	0.0714	0.0714	0.0714	0.0714	0.0714	0.0714	0.0000	220.9670	220.9670	0.0201	3.7400e-003	222.5635
Unmitigated	5.1437	0.2950	10.3804	1.6700e-003	0.0714	0.0714	0.0714	0.0714	0.0714	0.0714	0.0000	220.9670	220.9670	0.0201	3.7400e-003	222.5635

6.2 Area by SubCategory
Unmitigated

SubCategory	Tons/yr											MT/yr				
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Architectural Coating	0.4137				0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	4.3998				0.0000	0.0000			0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0206	0.1763	0.0750	1.1200e-003	0.0143	0.0143	0.0143	0.0143	0.0143	0.0143	0.0000	204.1166	204.1166	3.9100e-003	3.7400e-003	205.3285
Landscaping	0.3096	0.1187	10.3054	5.4000e-004	0.0572	0.0572	0.0572	0.0572	0.0572	0.0572	0.0000	16.8504	16.8504	0.0161	0.0000	17.2540
Total	5.1437	0.2950	10.3804	1.6600e-003	0.0714	0.0714	0.0714	0.0714	0.0714	0.0714	0.0000	220.9670	220.9670	0.0201	3.7400e-003	222.5635

SWRCC-18
 (cont'd)

**6.2 Area by SubCategory
 Mitigated**

SubCategory	Tons/yr										MT/yr					
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Architectural Coating	0.4137					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	4.3998					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Health	0.0206	0.1763	0.0750	1.1200e-003		0.0143	0.0143		0.0143	0.0143	0.0000	204.1166	204.1166	3.9100e-003	3.7400e-003	205.3285
Landscaping	0.3096	0.1187	10.3054	5.4000e-004		0.0572	0.0572		0.0572	0.0572	0.0000	16.8504	16.8504	0.0161	0.0000	17.2540
Total	5.1437	0.2950	10.3804	1.6600e-003		0.0714	0.0714		0.0714	0.0714	0.0000	220.9670	220.9670	0.0201	3.7400e-003	222.5835

7.0 Water Detail

7.1 Mitigation Measures Water

SWRCC-18
 (cont'd)

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

SWRCC-18
 (cont'd)

7.2 Water by Land Use
Unmitigated

Land Use	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Mgal	MT/yr	MT/yr	MT/yr	MT/yr	MT/yr
Apartments Low Rise	1,52885 / 1,32886	10,9095	0,0535	1,3400e-003	12,6471
Apartments Mid Rise	63,5252 / 40,0485	425,4719	2,0867	0,0523	493,2363
General Office Building	7,8902 / 4,9021	53,0719	0,2627	6,5900e-003	61,6019
High Turnover (Sit Down Restaurant)	10,9272 / 0,697482	51,2702	0,3580	8,8200e-003	62,8482
Hotel	1,26834 / 0,140927	6,1633	0,0416	1,0300e-003	7,5079
Quality Restaurant	2,42827 / 0,154986	11,3834	0,0780	1,9000e-003	13,9603
Regional Shopping Center	4,14806 / 2,54236	27,5250	0,1363	3,4200e-003	31,9490
Total		585,8052	3,0183	0,0755	683,7567

SWRCC-18
 (cont'd)

7.2 Water by Land Use Mitigated

Land Use	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Mgal	MT/yr	MT/yr	MT/yr	MT/yr	MT/yr
Apartments Low Rise	1,52885 / 1,32886	10,9095	0,0535	1,3400e-003	12,6471
Apartments Mid Rise	63,5252 / 40,0485	425,4719	2,0867	0,0523	493,2363
General Office Building	7,8902 / 4,9021	53,0719	0,2627	6,5900e-003	61,6019
High Turnover (Sit Down Restaurant)	10,9272 / 0,697482	51,2702	0,3580	8,8200e-003	62,8482
Hotel	1,26834 / 0,140927	6,1633	0,0416	1,0300e-003	7,5079
Quality Restaurant	2,42827 / 0,154986	11,3834	0,0780	1,9000e-003	13,9603
Regional Shopping Center	4,14806 / 2,54236	27,5250	0,1363	3,4200e-003	31,9490
Total		585,8052	3,0183	0,0755	683,7567

8.0 Waste Detail

8.1 Mitigation Measures Waste

SWRCC-18
(cont'd)

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	207.8075	12.2811	0.0000	514.8354
Unmitigated	207.8075	12.2811	0.0000	514.8354

SWRCC-18
 (cont'd)

8.2 Waste by Land Use
Unmitigated

Land Use	Waste Disposed tons	Total CO2	CH4	N2O	CO2e
		MT/yr			
Apartments Low Rise	11.5	2.3344	0.1380	0.0000	5.7634
Apartments Mid Rise	448.5	91,0415	5.3804	0.0000	225.5513
General Office Building	41.85	8.4952	0.5021	0.0000	21.0464
High Turnover (Sit Down Restaurant)	428.4	86.9613	5.1383	0.0000	215.4430
Hotel	27.38	5.5579	0.3285	0.0000	13.7694
Quality Restaurant	7.3	1.4910	0.0970	0.0000	3.0712
Regional Shopping Center	58.8	11.9359	0.7054	0.0000	29.5706
Total		207.8079	12.2811	0.0000	514.8354

SWRCC-18
 (cont'd)

8.2 Waste by Land Use

Mitigated

Land Use	Waste Disposed tons	Total CO2	CH4	N2O	CO2e
Apartment Low Rise	11.5	2.3344	0.1380	0.0000	5.7634
Apartment Mid Rise	448.5	91.0415	5.3804	0.0000	225.5513
General Office Building	41.85	8.4952	0.5021	0.0000	21.0464
High Turnover (Sit Down Restaurant)	428.4	86.9613	5.1393	0.0000	215.4430
Hotel	27.38	5.5579	0.3285	0.0000	13.7694
Quality Restaurant	7.3	1.4910	0.0970	0.0000	3.0712
Regional Shopping Center	58.8	11.9359	0.7054	0.0000	29.5706
Total		207.8079	12.2811	0.0000	514.8354

9.0 Operational Offroad

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

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

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

SWRCC-18
(cont'd)

Boilers

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

User Defined Equipment

Equipment Type	Number
----------------	--------

11.0 Vegetation

SWRCC-18
(cont'd)

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

1.0 Project Characteristics

1.1 Land Usage

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

1.2 Other Project Characteristics

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

1.3 User Entered Comments & Non-Default Data

SWRCC-18
 (cont'd)

Project Characteristics - Consistent with the DEIR's model.
 Land Use - See SWAPE comment regarding residential and retail land uses.
 Construction Phase - See SWAPE comment regarding individual construction phase lengths.
 Demolition - Consistent with the DEIR's model. See SWAPE comment regarding demolition.
 Vehicle Trips - Saturday trips consistent with the DEIR's model. See SWAPE comment regarding weekday and Sunday trips.
 Woodstoves - Woodstoves and wood-burning fireplaces consistent with the DEIR's model. See SWAPE comment regarding gas fireplaces.
 Energy Use -
 Construction Off-road Equipment Mitigation - See SWAPE comment on construction-related mitigation.
 Area Mitigation - See SWAPE comment regarding operational mitigation measures.
 Water Mitigation - See SWAPE comment regarding operational mitigation measures.

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

SWRCC-18
 (cont'd)

tlbVehicleTrips	SU_TR	5.95	3.20
tlbVehicleTrips	SU_TR	72.16	57.65
tlbVehicleTrips	SU_TR	25.24	6.39
tlbVehicleTrips	WD_TR	5.59	5.83
tlbVehicleTrips	WD_TR	5.65	4.13
tlbVehicleTrips	WD_TR	11.03	6.41
tlbVehicleTrips	WD_TR	127.15	65.80
tlbVehicleTrips	WD_TR	8.17	3.84
tlbVehicleTrips	WD_TR	89.95	62.64
tlbVehicleTrips	WD_TR	42.70	9.43
tlbWoodstoves	NumberCatalytic	1.25	0.00
tlbWoodstoves	NumberCatalytic	48.75	0.00
tlbWoodstoves	NumberNoncatalytic	1.25	0.00
tlbWoodstoves	NumberNoncatalytic	48.75	0.00
tlbWoodstoves	WoodstoveDayYear	25.00	0.00
tlbWoodstoves	WoodstoveDayYear	25.00	0.00
tlbWoodstoves	WoodstoveWoodMass	999.60	0.00
tlbWoodstoves	WoodstoveWoodMass	999.60	0.00

2.0 Emissions Summary

SWRCC-18
 (cont'd)

2.1 Overall Construction (Maximum Daily Emission)
Unmitigated Construction

Year	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
2021	4,2769	46,4588	31,6840	0,0643	18,2675	2,0461	20,3135	9,9840	1,8824	11,8664	0,0000	6,234,797	4	1,9495	0,0000	6,283,535
2022	5,3304	38,8967	49,5629	0,1517	9,8688	1,5386	10,7727	3,6558	1,5037	5,1615	0,0000	15,251,56	74	1,9503	0,0000	15,278,52
2023	4,8957	26,3317	46,7567	0,1472	9,8688	0,7784	10,6482	2,6381	0,7322	3,3702	0,0000	14,807,52	69	1,0250	0,0000	14,833,15
2024	237,1630	9,5575	15,1043	0,0244	1,7884	0,4688	1,8628	0,4743	0,4322	0,5476	0,0000	2,361,398	9	0,7177	0,0000	2,379,342
Maximum	237,1630	46,4588	49,5629	0,1517	18,2675	2,0461	20,3135	9,9840	1,8824	11,8664	0,0000	15,251,56	74	1,9503	0,0000	15,278,52

SWRCC-18
(cont'd)

**2.1 Overall Construction (Maximum Daily Emission)
 Mitigated Construction**

Year	lb/day											lb/day				
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
2021	4,2769	46,4588	31,6840	0,0643	18,2675	2,0461	20,3135	9,9840	1,8824	11,8664	0,0000	6,234,797	4	1,9495	0,0000	6,283,535
2022	5,3304	38,8967	49,5629	0,1517	9,8688	1,6386	10,7727	3,6558	1,5037	5,1615	0,0000	15,251,56	74	1,9503	0,0000	15,278,52
2023	4,8957	26,3317	46,7567	0,1472	9,8688	0,7784	10,6482	2,6381	0,7322	3,3702	0,0000	14,807,52	69	1,0250	0,0000	14,833,15
2024	237,1630	9,5575	15,1043	0,0244	1,7884	0,4688	1,8628	0,4743	0,4322	0,5476	0,0000	2,361,398	9	0,7177	0,0000	2,379,342
Maximum	237,1630	46,4588	49,5629	0,1517	18,2675	2,0461	20,3135	9,9840	1,8824	11,8664	0,0000	15,251,56	74	1,9503	0,0000	15,278,52
Percent Reduction	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00

SWRCC-18
 (cont'd)

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

**2.2 Overall Operational
 Unmitigated Operational**

Category	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Area	30.5020	15.0496	86.4430	0.0944	1.5974	1.5974	1.5974	1.5974	1.5974	1.5974	0.0000	18,148.59	18,148.59	0.4874	0.3300	18,259.11
Energy	0.7660	6.7462	4.2573	0.0418	0.5292	0.5292	0.5292	0.5292	0.5292	0.5292	0.0000	8,355.983	8,355.983	0.1602	0.1532	8,405.638
Mobile	9.8489	45.4304	114.8495	0.4917	45.9592	0.3360	46.2951	12.2950	0.3119	12.6070	0.0000	50,306.60	50,306.60	2.1807	0.08	50,361.12
Total	41.1168	67.2262	207.5497	0.6278	45.9592	2.4626	48.4217	12.2950	2.4385	14.7336	0.0000	76,811.18	76,811.18	2.8282	0.4832	77,025.87

Mitigated Operational

Category	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Area	30.5020	15.0496	86.4430	0.0944	1.5974	1.5974	1.5974	1.5974	1.5974	1.5974	0.0000	18,148.59	18,148.59	0.4874	0.3300	18,259.11
Energy	0.7660	6.7462	4.2573	0.0418	0.5292	0.5292	0.5292	0.5292	0.5292	0.5292	0.0000	8,355.983	8,355.983	0.1602	0.1532	8,405.638
Mobile	9.8489	45.4304	114.8495	0.4917	45.9592	0.3360	46.2951	12.2950	0.3119	12.6070	0.0000	50,306.60	50,306.60	2.1807	0.08	50,361.12
Total	41.1168	67.2262	207.5497	0.6278	45.9592	2.4626	48.4217	12.2950	2.4385	14.7336	0.0000	76,811.18	76,811.18	2.8282	0.4832	77,025.87

SWRCC-18
 (cont'd)

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

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

3.0 Construction Detail

Construction Phase

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

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 112.5

Acres of Paving: 0

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

OffRoad Equipment

SWRCC-18
(cont'd)

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

Trips and VMT

SWRCC-18
(cont'd)

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

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

3.1 Mitigation Measures Construction

3.2 Demolition - 2021

Unmitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Fugitive Dust					3.3074	0.0000	3.3074	0.5008	0.0000	0.5008			0.0000			0.0000
Off-Road	3.1651	31.4407	21.5650	0.0388	1.5513	1.5513	1.5513	1.4411	1.4411	1.4411		3,747,944.9	3,747,944.9	1.0549		3,774,317.4
Total	3.1651	31.4407	21.5650	0.0388	3.3074	1.5513	4.8588	0.5008	1.4411	1.9419		3,747,944.9	3,747,944.9	1.0549		3,774,317.4

SWRCC-18
(cont'd)

3.2 Demolition - 2021
Unmitigated Construction Off-Site

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

Mitigated Construction On-Site

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

SWRCC-18
(cont'd)

3.2 Demolition - 2021
Mitigated Construction Off-Site

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

3.3 Site Preparation - 2021
Unmitigated Construction On-Site

Category	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307			0.0000			0.0000
Off-Road	3.8852	40.4971	21.1543	0.0380	2.0445	2.0445	2.0445	1.8809	1.8809	1.8809		3,685.6569	3,685.6569	1.1920		3,715.4573
Total	3.8852	40.4971	21.1543	0.0380	18.0663	2.0445	20.1107	9.9307	1.8809	11.8116		3,685.6569	3,685.6569	1.1920		3,715.4573

SWRCC-18
(cont'd)

**3.3 Site Preparation - 2021
 Unmitigated Construction Off-Site**

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0772	0.0530	0.7250	2.0600e-003	0.2012	1.6300e-003	0.2028	0.0534	1.5000e-003	0.0549	204.9786	204.9786	204.9786	6.0400e-003	0.0000	205.1286	205.1286
Total	0.0772	0.0530	0.7250	2.0600e-003	0.2012	1.6300e-003	0.2028	0.0534	1.5000e-003	0.0549	204.9786	204.9786	204.9786	6.0400e-003	0.0000	205.1286	205.1286

Mitigated Construction On-Site

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	3.8862	40.4971	21.1543	0.0380	2.0445	2.0445	2.0445	1.8809	1.8809	1.8809	0.0000	3.685.6569	3.685.6569	1.1920	0.0000	3.715.4573	3.715.4573
Total	3.8862	40.4971	21.1543	0.0380	18.0663	2.0445	20.1107	9.9307	1.8809	11.8116	0.0000	3.685.6569	3.685.6569	1.1920	0.0000	3.715.4573	3.715.4573

SWRCC-18
 (cont'd)

3.3 Site Preparation - 2021

Mitigated Construction Off-Site

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0772	0.0530	0.7250	2.0600e-003	0.2012	1.6300e-003	0.2028	0.0534	1.5000e-003	0.0549	204.9786	204.9786	204.9786	6.0400e-003		205.1286	
Total	0.0772	0.0530	0.7250	2.0600e-003	0.2012	1.6300e-003	0.2028	0.0534	1.5000e-003	0.0549	204.9786	204.9786	204.9786	6.0400e-003		205.1286	

3.4 Grading - 2021

Unmitigated Construction On-Site

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000	
Off-Road	4.1912	46.3998	30.8785	0.0620	1.9853	1.9853	1.9853	1.8265	1.8265	1.8265	6.007.043	6.007.043	6.007.043	1.9428		6.055.613	4
Total	4.1912	46.3998	30.8785	0.0620	8.6733	1.9853	10.6587	3.5965	1.8265	5.4230	6.007.043	6.007.043	6.007.043	1.9428		6.055.613	4

SWRCC-18
(cont'd)

3.4 Grading - 2021
Unmitigated Construction Off-Site

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

Mitigated Construction On-Site

Category	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965	0.0000	0.0000	0.0000			0.0000
Off-Road	4.1912	46.3998	30.8785	0.0620	1.9853	1.9853	1.9853	1.8265	1.8265	1.8265	0.0000	6.007.0434	6.007.0434	1.9428		6.055.6134
Total	4.1912	46.3998	30.8785	0.0620	8.6733	1.9853	10.6587	3.5965	1.8265	5.4230	0.0000	6.007.0434	6.007.0434	1.9428		6.055.6134

SWRCC-18
(cont'd)

3.4 Grading - 2021

Mitigated Construction Off-Site

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

3.4 Grading - 2022

Unmitigated Construction On-Site

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Fugitive Dust	3.6248	38.8435	29.0415	0.0621	8.6733	0.0000	8.6733	3.5965	0.0000	3.5965	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	3.6248	38.8435	29.0415	0.0621	1.6349	1.6349	1.6349	1.5041	1.5041	1.5041	6.011.4105	6.011.4105	1.9442	1.9442	1.9442	6.060.0158	6.060.0158
Total	3.6248	38.8435	29.0415	0.0621	8.6733	1.6349	10.3082	3.5965	1.5041	5.1006	6.011.4105	6.011.4105	1.9442	1.9442	1.9442	6.060.0158	6.060.0158

SWRCC-18
(cont'd)

3.4 Grading - 2022
Unmitigated Construction Off-Site

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

Mitigated Construction On-Site

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

SWRCC-18
(cont'd)

3.4 Grading - 2022

Mitigated Construction Off-Site

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0803	0.0532	0.7432	2.2100e-003	0.2236	1.7500e-003	0.2253	0.0583	1.6100e-003	0.0609	219.7425	219.7425	6.0600e-003	219.7425	6.0600e-003	219.8941	219.8941
Total	0.0803	0.0532	0.7432	2.2100e-003	0.2236	1.7500e-003	0.2253	0.0583	1.6100e-003	0.0609	219.7425	219.7425	6.0600e-003	219.7425	6.0600e-003	219.8941	219.8941

3.5 Building Construction - 2022

Unmitigated Construction On-Site

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

SWRCC-18
(cont'd)

3.5 Building Construction - 2022
Unmitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000
Vendor	0.4079	13.2032	3.4341	0.0364	0.9155	0.0248	0.9404	0.2636	0.0237	0.2873	3,896,548 ²	3,896,548 ²	3,896,548 ²	0.2236		3,902,138 ⁴
Worker	3.2162	2.1318	29.7654	0.0883	8.9533	0.0701	9.0234	2.3745	0.0646	2.4390	8,800,685 ⁷	8,800,685 ⁷	8,800,685 ⁷	0.2429		8,805,758 ²
Total	3.6242	15.3350	33.1995	0.1247	9.8688	0.0949	9.9637	2.6381	0.0883	2.7263	12,697.23³⁹	12,697.23³⁹	12,697.23³⁹	0.4665		12,708.89⁶⁶

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Off-Road	1.7062	15.6156	16.3634	0.0269		0.8090	0.8090		0.7612	0.7612	0.0000	2,554,333 ⁶	2,554,333 ⁶	0.6120		2,569,632 ²
Total	1.7062	15.6156	16.3634	0.0269		0.8090	0.8090		0.7612	0.7612	0.0000	2,554,333⁶	2,554,333⁶	0.6120		2,569,632²

SWRCC-18
(cont'd)

3.5 Building Construction - 2022
Mitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000
Vendor	0.4079	13.2032	3.4341	0.0364	0.9155	0.0248	0.9404	0.2636	0.0237	0.2873	3,896,548	3,896,548	2	0.2236		3,902,138
Worker	3.2162	2.1318	29.7654	0.0883	8.9533	0.0701	9.0234	2.3745	0.0646	2.4390	8,800,685	8,800,685	7	0.2429		8,805,758
Total	3.6242	15.3350	33.1995	0.1247	9.8688	0.0949	9.9637	2.6381	0.0883	2.7263	12,697.23	12,697.23	39	0.4665		12,708.89

3.5 Building Construction - 2023
Unmitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Off-Road	1.5728	14.3849	16.2440	0.0269		0.6997	0.6997		0.6584	0.6584	2,555,209	2,555,209	9	0.6079		2,570,406
Total	1.5728	14.3849	16.2440	0.0269		0.6997	0.6997		0.6584	0.6584	2,555,209	2,555,209	9	0.6079		2,570,406

SWRCC-18
(cont'd)

**3.5 Building Construction - 2023
 Unmitigated Construction Off-Site**

Category	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.3027	10.0181	3.1014	0.0352	0.9156	0.0116	0.9271	0.2636	0.0111	0.2747	3,773.8762	3,773.8762	0.1982			3,776.8300
Worker	3.0203	1.9287	27.4113	0.0851	8.9533	0.0581	9.0214	2.3745	0.0627	2.4372	8,478.4408	8,478.4408	0.2190			8,483.9160
Total	3.3229	11.9468	30.5127	0.1203	9.8688	0.0737	9.9485	2.6381	0.0738	2.7118	12,252.3170	12,252.3170	0.4172			12,262.7460

Mitigated Construction On-Site

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

SWRCC-18
 (cont'd)

3.5 Building Construction - 2023
Mitigated Construction Off-Site

Category	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.3027	10.0181	3.1014	0.0352	0.9156	0.0116	0.9271	0.2636	0.0111	0.2747	3,773.8762	3,773.8762	0.1982	0.0000	0.0000	3,776.8300
Worker	3.0203	1.9287	27.4113	0.0851	8.9533	0.0581	9.0214	2.3745	0.0627	2.4372	8,478.4408	8,478.4408	0.2190	0.0000	0.0000	8,483.9160
Total	3.3229	11.9468	30.5127	0.1203	9.8688	0.0797	9.9485	2.6381	0.0738	2.7118	12,252.3170	12,252.3170	0.4172	0.0000	0.0000	12,262.7460

3.6 Paving - 2023
Unmitigated Construction On-Site

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

SWRCC-18
(cont'd)

3.6 Paving - 2023

Unmitigated Construction Off-Site

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

Mitigated Construction On-Site

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Off-Road	1.0327	10.1917	14.5642	0.0228	0.5102	0.5102	0.5102	0.4694	0.4694	0.4694	0.0000	2.207584	2.207584	0.7140	0.0000	2.225433	2.225433
Paving	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	1.0327	10.1917	14.5642	0.0228	0.5102	0.5102	0.5102	0.4694	0.4694	0.4694	0.0000	2.207584	2.207584	0.7140	0.0000	2.225433	2.225433

SWRCC-18
(cont'd)

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

3.6 Paving - 2023

Mitigated Construction Off-Site

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

3.6 Paving - 2024

Unmitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Off-Road	0.9882	9.5246	14.6258	0.0228	0.4685	0.4685	0.4685	0.4310	0.4310	0.4310	2,207.547 ₂	2,207.547 ₂	0.7140	0.7140	0.0000	2,225.396 ₃
Paving	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.9882	9.5246	14.6258	0.0228	0.4685	0.4685	0.4685	0.4310	0.4310	0.4310	2,207.547₂	2,207.547₂	0.7140	0.7140	0.0000	2,225.396₃

SWRCC-18
(cont'd)

3.6 Paving - 2024

Unmitigated Construction Off-Site

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

Mitigated Construction On-Site

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Off-Road	0.9882	9.5246	14.6258	0.0228		0.4685	0.4685		0.4310	0.4310	0.0000	2,207.547 ₂	2,207.547 ₂	0.7140		2,225.396 ₃	2,225.396 ₃
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000	0.0000
Total	0.9882	9.5246	14.6258	0.0228		0.4685	0.4685		0.4310	0.4310	0.0000	2,207.547₂	2,207.547₂	0.7140		2,225.396₃	2,225.396₃

SWRCC-18
(cont'd)

3.6 Paving - 2024

Mitigated Construction Off-Site

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

3.7 Architectural Coating - 2024

Unmitigated Construction On-Site

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Archit. Coating	236.4115					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000	0.0000
Off-Road	0.1808	1.2188	1.8101	2.9700e-003		0.0609	0.0609		0.0609	0.0609	281.4481	281.4481	0.0159	0.0159		281.8443	281.8443
Total	236.5923	1.2188	1.8101	2.9700e-003		0.0609	0.0609		0.0609	0.0609	281.4481	281.4481	0.0159	0.0159		281.8443	281.8443

SWRCC-18
(cont'd)

3.7 Architectural Coating - 2024
Unmitigated Construction Off-Site

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.5707	0.3513	5.1044	0.0165	1.7884	0.0134	1.8018	0.4743	0.0123	0.4866	1,641,085 ₂	1,641,085 ₂	1,641,085 ₂	0.0401		1,642,088 ₆	
Total	0.5707	0.3513	5.1044	0.0165	1.7884	0.0134	1.8018	0.4743	0.0123	0.4866	1,641,085₂	1,641,085₂	1,641,085₂	0.0401		1,642,088₆	

Mitigated Construction On-Site

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Archit. Coating	236.4115					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000	
Off-Road	0.1808	1.2188	1.8101	2.9700e-003		0.0609	0.0609		0.0609	0.0609	0.0000	281,4481	281,4481	0.0159		281,8443	
Total	236.5923	1.2188	1.8101	2.9700e-003		0.0609	0.0609		0.0609	0.0609	0.0000	281,4481	281,4481	0.0159		281,8443	

SWRCC-18
(cont'd)

**3.7 Architectural Coating - 2024
 Mitigated Construction Off-Site**

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.5707	0.3513	5.1044	0.0165	1.7884	0.0134	1.8018	0.4743	0.0123	0.4866	1,641,085 ₂	1,641,085 ₂	1,641,085 ₂	0.0401		1,642,088 ₆	
Total	0.5707	0.3513	5.1044	0.0165	1.7884	0.0134	1.8018	0.4743	0.0123	0.4866	1,641,085₂	1,641,085₂	1,641,085₂	0.0401		1,642,088₆	

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

SWRCC-18
 (cont'd)

Category	lb/day											CO2e				
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2		NBio- CO2	Total CO2	CH4	N2O
Mitigated	9.8489	45.4304	114.8495	0.4917	45.9592	0.3380	46.2951	12.2950	0.3119	12.6070	50.305.60	50.305.60	150.305.60	2.1807		50,361.12
Unmitigated	9.8489	45.4304	114.8495	0.4917	45.9592	0.3380	46.2951	12.2950	0.3119	12.6070	50.305.60	50.305.60	150.305.60	2.1807		50,361.12

4.2 Trip Summary Information

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

4.3 Trip Type Information

SWRCC-18
 (cont'd)

Land Use	Miles						Trip %						Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments Low Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3						
Apartments Mid Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3						
General Office Building	16.60	8.40	6.90	33.00	48.00	19.00	77	19	4						
High Turnover (Sit Down Hotel)	16.60	8.40	6.90	8.50	72.50	19.00	37	20	43						
Quality Restaurant	16.60	8.40	6.90	19.40	61.60	19.00	58	38	4						
Regional Shopping Center	16.60	8.40	6.90	12.00	66.00	19.00	38	18	44						
	16.60	8.40	6.90	16.30	64.70	19.00	54	35	11						

4.4 Fleet Mix

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

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

SWRCC-18
(cont'd)

Category	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Natural Gas Mitigated	0.7660	6.7462	4.2573	0.0418	0.5292	0.5292	0.5292	0.5292	0.5292	0.5292	0.355.983	0.355.983	18.355.983	0.1602	0.1532	8,405.638
Natural Gas Unmitigated	0.7660	6.7462	4.2573	0.0418	0.5292	0.5292	0.5292	0.5292	0.5292	0.5292	0.355.983	0.355.983	18.355.983	0.1602	0.1532	8,405.638

SWRCC-18
(cont'd)

**5.2 Energy by Land Use - NaturalGas
 Unmitigated**

Land Use	NaturalGas Use kBTU/yr	lb/day										lb/day					
		ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Apartments Low Rise	1119.16	0.0121	0.1031	0.0439	6.6000e-004	8.3400e-003	8.3400e-003	8.3400e-003	8.3400e-003	8.3400e-003	8.3400e-003	131.6662	131.6662	131.6662	2.5200e-003	2.4100e-003	132.4486
Apartments Mid Rise	35764.3	0.3659	3.2976	1.4033	0.0211	0.2666	0.2666	0.2666	0.2666	0.2666	0.2666	4,209,916	4,209,916	4,209,916	0.0807	0.0772	4,234,933
General Office Building	1283.42	0.0138	0.1258	0.1057	7.5000e-004	9.5600e-003	9.5600e-003	9.5600e-003	9.5600e-003	9.5600e-003	9.5600e-003	150.9911	150.9911	150.9911	2.8900e-003	2.7700e-003	151.8684
High Turnover (Sit Down Restaurant)	22759.9	0.2455	2.2314	1.8743	0.0194	0.1696	0.1696	0.1696	0.1696	0.1696	0.1696	2,677,634	2,677,634	2,677,634	0.0513	0.0491	2,693,546
Hotel	4769.72	0.0514	0.4676	0.3928	2.8100e-003	0.0355	0.0355	0.0355	0.0355	0.0355	0.0355	561.1436	561.1436	561.1436	0.0108	0.0103	564.4782
Quality Restaurant	5057.75	0.0545	0.4959	0.4165	2.8000e-003	0.0377	0.0377	0.0377	0.0377	0.0377	0.0377	595.0290	595.0290	595.0290	0.0114	0.0109	596.5658
Regional Shopping Center	251,616	2.7100e-003	0.0247	0.0207	1.5000e-004	1.8700e-003	1.8700e-003	1.8700e-003	1.8700e-003	1.8700e-003	1.8700e-003	29,6019	29,6019	29,6019	5.7000e-004	5.4000e-004	29,7778
Total		0.7660	6.7463	4.2573	0.0418	0.5292	0.5292	0.5292	0.5292	0.5292	0.5292	8,355,983	8,355,983	8,355,983	0.1602	0.1532	8,405,638

SWRCC-18
(cont'd)

5.2 Energy by Land Use - NaturalGas Mitigated

Land Use	NaturalGas Use kBTU/yr	lb/day										CO2e					
		ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total		Bio- CO2	NBio- CO2	Total CO2	CH4	N2O
Apartments Low Rise	1.11916	0.0121	0.1031	0.0439	6.6000e-004	8.3400e-003	8.3400e-003	8.3400e-003	8.3400e-003	8.3400e-003	8.3400e-003	131.6662	131.6662	131.6662	2.5200e-003	2.4100e-003	132.4486
Apartments Mid Rise	33.7843	0.3859	3.2978	1.4033	0.0211	0.2666	0.2666	0.2666	0.2666	0.2666	0.2666	4,209.9164	4,209.9164	4,209.9164	0.0807	0.0772	4,234.8339
General Office Building	1.26342	0.0138	0.1258	0.1057	7.5000e-004	9.5600e-003	9.5600e-003	9.5600e-003	9.5600e-003	9.5600e-003	9.5600e-003	150.9911	150.9911	150.9911	2.8900e-003	2.7700e-003	151.8684
High Turnover (Sit Down Restaurant)	22.7599	0.2455	2.2314	1.8743	0.0194	0.1696	0.1696	0.1696	0.1696	0.1696	0.1696	2,677.6342	2,677.6342	2,677.6342	0.0513	0.0491	2,693.5460
Hotel	4.76972	0.0514	0.4676	0.3928	2.8100e-003	0.0355	0.0355	0.0355	0.0355	0.0355	0.0355	561.1436	561.1436	561.1436	0.0108	0.0103	564.4782
Quality Restaurant	5.05775	0.0545	0.4959	0.4165	2.8000e-003	0.0377	0.0377	0.0377	0.0377	0.0377	0.0377	595.0290	595.0290	595.0290	0.0114	0.0109	596.5658
Regional Shopping Center	0.251616	2.7100e-003	0.0247	0.0207	1.5000e-004	1.8700e-003	1.8700e-003	1.8700e-003	1.8700e-003	1.8700e-003	1.8700e-003	29.6019	29.6019	29.6019	5.7000e-004	5.4000e-004	29.7778
Total		0.7660	6.7463	4.2573	0.0418	0.5292	0.5292	0.5292	0.5292	0.5292	0.5292	8,355.9832	8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387

6.0 Area Detail

6.1 Mitigation Measures Area

SWRCC-18
(cont'd)

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Mitigated	30.5020	15.0496	88.4430	0.0944	1.5974	1.5974	1.5974	1.5974	1.5974	1.5974	0.0000	18,148.59	18,148.59	0.4874	0.3300	18,259.11
Unmitigated	30.5020	15.0496	88.4430	0.0944	1.5974	1.5974	1.5974	1.5974	1.5974	1.5974	0.0000	18,148.59	18,148.59	0.4874	0.3300	18,259.11

6.2 Area by SubCategory
Unmitigated

SubCategory	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Architectural Coating	2.2670				0.0000	0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	24.1065				0.0000	0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	1.6500	14.1000	6.0000	0.0900	1.1400	1.1400	1.1400	1.1400	1.1400	1.1400	0.0000	18,000.00	18,000.00	0.3450	0.3300	18,106.96
Landscaping	2.4766	0.9496	82.4430	4.3600e-003	0.4574	0.4574	0.4574	0.4574	0.4574	0.4574		148.5950	148.5950	0.1424		152.1542
Total	30.5020	15.0496	88.4430	0.0944	1.5974	1.5974	1.5974	1.5974	1.5974	1.5974	0.0000	18,148.59	18,148.59	0.4874	0.3300	18,259.11

SWRCC-18
 (cont'd)

**6.2 Area by SubCategory
 Mitigated**

SubCategory	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Architectural Coating	2.2670					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	24.1085					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Heath	1.6500	14.1000	6.0000	0.0900	1.1400	1.1400	1.1400	1.1400	1.1400	1.1400	0.0000	18,000.00	18,000.00	0.3450	0.3300	18,106.96
Landscaping	2.4786	0.9496	82.4430	4.3600e-003	0.4574	0.4574	0.4574	0.4574	0.4574	0.4574	148.5950	148.5950	0.1424			152.1542
Total	30.5020	15.0496	88.4430	0.0944	1.5974	1.5974	1.5974	1.5974	1.5974	1.5974	0.0000	18,148.59	18,148.59	0.4874	0.3300	18,259.11

7.0 Water Detail

7.1 Mitigation Measures Water

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

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

10.0 Stationary Equipment

SWRCC-18
 (cont'd)

Fire Pumps and Emergency Generators

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

Boilers

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

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

SWRCC-18
 (cont'd)

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

1.0 Project Characteristics

1.1 Land Usage

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

1.2 Other Project Characteristics

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

1.3 User Entered Comments & Non-Default Data

SWRCC-18
 (cont'd)

Project Characteristics - Consistent with the DEIR's model.
 Land Use - See SWAPE comment regarding residential and retail land uses.
 Construction Phase - See SWAPE comment regarding individual construction phase lengths.
 Demolition - Consistent with the DEIR's model. See SWAPE comment regarding demolition.
 Vehicle Trips - Saturday trips consistent with the DEIR's model. See SWAPE comment regarding weekday and Sunday trips.
 Woodstoves - Woodstoves and wood-burning fireplaces consistent with the DEIR's model. See SWAPE comment regarding gas fireplaces.
 Energy Use -
 Construction Off-road Equipment Mitigation - See SWAPE comment on construction-related mitigation.
 Area Mitigation - See SWAPE comment regarding operational mitigation measures.
 Water Mitigation - See SWAPE comment regarding operational mitigation measures.

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

SWRCC-18
(cont'd)

tblVehicleTrips	SU_TR	5.95	3.20
tblVehicleTrips	SU_TR	72.16	57.65
tblVehicleTrips	SU_TR	25.24	6.39
tblVehicleTrips	WD_TR	5.59	5.83
tblVehicleTrips	WD_TR	5.65	4.13
tblVehicleTrips	WD_TR	11.03	6.41
tblVehicleTrips	WD_TR	127.15	65.80
tblVehicleTrips	WD_TR	8.17	3.84
tblVehicleTrips	WD_TR	89.95	62.64
tblVehicleTrips	WD_TR	42.70	9.43
tblWoodstoves	NumberCatalytic	1.25	0.00
tblWoodstoves	NumberCatalytic	48.75	0.00
tblWoodstoves	NumberNoncatalytic	1.25	0.00
tblWoodstoves	NumberNoncatalytic	48.75	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00

2.0 Emissions Summary

SWRCC-18
(cont'd)

**2.1 Overall Construction (Maximum Daily Emission)
 Unmitigated Construction**

Year	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
2021	4.2865	46.4651	31.6150	0.0642	18.2675	2.0461	20.3135	9.9840	1.8824	11.8664	0.0000	6,221.4937	6,221.4937	1.9491	0.0000	0.0000	6,270.2214
2022	5.7218	38.9024	47.3319	0.1455	9.8688	1.5386	10.7736	3.6556	1.5037	5.1615	0.0000	14,630.3099	14,630.3099	1.9499	0.0000	0.0000	14,657.2663
2023	5.2705	26.4914	44.5936	0.1413	9.8688	0.7800	10.6488	2.6381	0.7328	3.3708	0.0000	14,210.3424	14,210.3424	1.0230	0.0000	0.0000	14,235.9160
2024	237.2328	9.5610	15.0611	0.0243	1.7884	0.4688	1.8628	0.4743	0.4322	0.5476	0.0000	2,352.4178	2,352.4178	0.7175	0.0000	0.0000	2,370.36550
Maximum	237.2328	46.4651	47.3319	0.1455	18.2675	2.0461	20.3135	9.9840	1.8824	11.8664	0.0000	14,630.3099	14,630.3099	1.9499	0.0000	0.0000	14,657.2663

SWRCC-18
 (cont'd)

**2.1 Overall Construction (Maximum Daily Emission)
 Mitigated Construction**

Year	lb/day											lb/day				
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
2021	4.2865	46.4651	31.6150	0.0642	18.2675	2.0461	20.3135	9.9840	1.8624	11.8664	0.0000	6,221.4937	1,6221.4937	1.9491	0.0000	6,270.2214
2022	5.7218	38.8024	47.3319	0.1455	9.8688	1.6386	10.7736	3.6556	1.5037	5.1615	0.0000	14,630.3099	14,630.3099	1.9499	0.0000	14,657.2663
2023	5.2705	26.4914	44.5936	0.1413	9.8688	0.7800	10.6488	2.6381	0.7328	3.3708	0.0000	14,210.3424	14,210.3424	1.0230	0.0000	14,235.9160
2024	237.2328	9.5610	15.0611	0.0243	1.7884	0.4688	1.8628	0.4743	0.4322	0.5476	0.0000	2,352.4178	2,352.4178	0.7175	0.0000	2,370.3655
Maximum	237.2328	46.4651	47.3319	0.1455	18.2675	2.0461	20.3135	9.9840	1.8624	11.8664	0.0000	14,630.3099	14,630.3099	1.9499	0.0000	14,657.2663
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

SWRCC-18
(cont'd)

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

**2.2 Overall Operational
 Unmitigated Operational**

Category	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Area	30.5020	15.0496	86.4430	0.0944	1.5974	1.5974	1.5974	1.5974	1.5974	1.5974	0.0000	18,148.59	18,148.59	0.4874	0.3300	18,259.11
Energy	0.7660	6.7462	4.2573	0.0418	0.5292	0.5292	0.5292	0.5292	0.5292	0.5292	0.0000	8,355.983	8,355.983	0.1602	0.1532	8,405.638
Mobile	9.5233	45.9914	110.0422	0.4681	45.9592	0.3373	46.2965	12.2950	0.3132	12.6083	0.0000	47,917.80	47,917.80	2.1953	0.4832	47,972.66
Total	40.7912	67.7872	202.7424	0.6043	45.9592	2.4640	48.4231	12.2950	2.4389	14.7349	0.0000	74,422.37	74,422.37	2.8429	0.4832	74,637.44

Mitigated Operational

Category	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Area	30.5020	15.0496	86.4430	0.0944	1.5974	1.5974	1.5974	1.5974	1.5974	1.5974	0.0000	18,148.59	18,148.59	0.4874	0.3300	18,259.11
Energy	0.7660	6.7462	4.2573	0.0418	0.5292	0.5292	0.5292	0.5292	0.5292	0.5292	0.0000	8,355.983	8,355.983	0.1602	0.1532	8,405.638
Mobile	9.5233	45.9914	110.0422	0.4681	45.9592	0.3373	46.2965	12.2950	0.3132	12.6083	0.0000	47,917.80	47,917.80	2.1953	0.4832	47,972.66
Total	40.7912	67.7872	202.7424	0.6043	45.9592	2.4640	48.4231	12.2950	2.4389	14.7349	0.0000	74,422.37	74,422.37	2.8429	0.4832	74,637.44

SWRCC-18
 (cont'd)

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

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

3.0 Construction Detail

Construction Phase

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

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 112.5

Acres of Paving: 0

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

OffRoad Equipment

SWRCC-18
(cont'd)

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

Trips and VMT

SWRCC-18
(cont'd)

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

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

3.1 Mitigation Measures Construction

3.2 Demolition - 2021

Unmitigated Construction On-Site

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

SWRCC-18
(cont'd)

3.2 Demolition - 2021
Unmitigated Construction Off-Site

Category	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.1304	4.1454	1.0182	0.0117	0.2669	0.0128	0.2797	0.0732	0.0122	0.0854		1,269,855 ⁵	1,269,855 ⁵	0.0908		1,272,125 ²
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0715	0.0489	0.5524	1.6100e-003	0.1677	1.3500e-003	0.1690	0.0445	1.2500e-003	0.0457		160,8377	160,8377	4.7300e-003		160,9560
Total	0.2019	4.1943	1.5706	0.0133	0.4346	0.0141	0.4487	0.1176	0.0135	0.1311		1,430,693²	1,430,693²	0.0955		1,433,081²

Mitigated Construction On-Site

Category	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Fugitive Dust					3.3074	0.0000	3.3074	0.5008	0.0000	0.5008			0.0000			0.0000
Off-Road	3.1651	31.4407	21.5650	0.0388		1.5513	1.5513	1.4411	1.4411	1.4411	0.0000	3,747,944 ⁹	3,747,944 ⁹	1.0549		3,774,317 ⁴
Total	3.1651	31.4407	21.5650	0.0388	3.3074	1.5513	4.8588	0.5008	1.4411	1.9419	0.0000	3,747,944⁹	3,747,944⁹	1.0549		3,774,317⁴

SWRCC-18
(cont'd)

3.2 Demolition - 2021
Mitigated Construction Off-Site

Category	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.1304	4.1454	1.0182	0.0117	0.2669	0.0128	0.2797	0.0732	0.0122	0.0854		1,289,855 ⁵	1,289,855 ⁵	0.0908		1,272,125 ²
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0715	0.0489	0.5524	1.6100e-003	0.1677	1.3500e-003	0.1690	0.0445	1.2500e-003	0.0457		160,837 ⁷	160,837 ⁷	4.7300e-003		160,9560
Total	0.2019	4.1943	1.5706	0.0133	0.4346	0.0141	0.4487	0.1176	0.0135	0.1311		1,430,693²	1,430,693²	0.0955		1,433,081²

3.3 Site Preparation - 2021
Unmitigated Construction On-Site

Category	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307			0.0000			0.0000
Off-Road	3.8862	40.4971	21.1543	0.0380	2.0445	2.0445	2.0445	1.8809	1.8809	1.8809		3,685,656 ⁹	3,685,656 ⁹	1.1920		3,715,457 ³
Total	3.8862	40.4971	21.1543	0.0380	18.0663	2.0445	20.1107	9.9307	1.8809	11.8116		3,685,656⁹	3,685,656⁹	1.1920		3,715,457³

SWRCC-18
(cont'd)

**3.3 Site Preparation - 2021
 Unmitigated Construction Off-Site**

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0858	0.0587	0.6629	1.9400e-003	0.2012	1.6300e-003	0.2028	0.0534	1.5000e-003	0.0549	193.0052	193.0052	5.6800e-003	193.1472		193.1472	
Total	0.0858	0.0587	0.6629	1.9400e-003	0.2012	1.6300e-003	0.2028	0.0534	1.5000e-003	0.0549	193.0052	193.0052	5.6800e-003	193.1472		193.1472	

Mitigated Construction On-Site

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307	0.0000	0.0000	0.0000			0.0000	
Off-Road	3.8852	40.4971	21.1543	0.0380	2.0445	2.0445	2.0445	1.8809	1.8809	1.8809	0.0000	3.685.6569	3.685.6569	1.1920		3.715.4573	
Total	3.8852	40.4971	21.1543	0.0380	18.0663	2.0445	20.1107	9.9307	1.8809	11.8116	0.0000	3.685.6569	3.685.6569	1.1920		3.715.4573	

SWRCC-18
(cont'd)

3.3 Site Preparation - 2021

Mitigated Construction Off-Site

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0858	0.0587	0.6629	1.9400e-003	0.2012	1.6300e-003	0.2028	0.0534	1.5000e-003	0.0549	193.0052	193.0052	5.6800e-003	193.1472		193.1472	
Total	0.0858	0.0587	0.6629	1.9400e-003	0.2012	1.6300e-003	0.2028	0.0534	1.5000e-003	0.0549	193.0052	193.0052	5.6800e-003	193.1472		193.1472	

3.4 Grading - 2021

Unmitigated Construction On-Site

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000	
Off-Road	4.1912	46.3998	30.8785	0.0620	1.9853	1.9853	1.9853	1.8265	1.8265	1.8265	6.007.043	6.007.043	1.9428	1.9428		6.055.613	4
Total	4.1912	46.3998	30.8785	0.0620	8.6733	1.9853	10.6587	3.5965	1.8265	5.4230	6.007.043	6.007.043	1.9428	1.9428		6.055.613	4

SWRCC-18
(cont'd)

3.4 Grading - 2021
Unmitigated Construction Off-Site

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0954	0.0652	0.7365	2.1500e-003	0.2236	1.8100e-003	0.2254	0.0593	1.6600e-003	0.0610	214.4502	214.4502	6.3100e-003	214.4502	0.0000	214.6080	214.6080
Total	0.0954	0.0652	0.7365	2.1500e-003	0.2236	1.8100e-003	0.2254	0.0593	1.6600e-003	0.0610	214.4502	214.4502	6.3100e-003	214.4502	0.0000	214.6080	214.6080

Mitigated Construction On-Site

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Fugitive Dust	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	4.1912	46.3998	30.8785	0.0620	8.6733	1.9853	1.9853	1.8265	1.8265	3.5965	0.0000	6.007.043	6.007.043	1.9428	0.0000	6.055.613	6.055.613
Total	4.1912	46.3998	30.8785	0.0620	8.6733	1.9853	10.6587	3.5965	1.8265	5.4230	0.0000	6.007.043	6.007.043	1.9428	0.0000	6.055.613	6.055.613

SWRCC-18
(cont'd)

3.4 Grading - 2021

Mitigated Construction Off-Site

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0954	0.0652	0.7365	2.1500e-003	0.2236	1.8100e-003	0.2254	0.0593	1.6600e-003	0.0610	214.4502	214.4502	6.3100e-003	214.4502	0.0000	214.6080	214.6080
Total	0.0954	0.0652	0.7365	2.1500e-003	0.2236	1.8100e-003	0.2254	0.0593	1.6600e-003	0.0610	214.4502	214.4502	6.3100e-003	214.4502	0.0000	214.6080	214.6080

3.4 Grading - 2022

Unmitigated Construction On-Site

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

SWRCC-18
(cont'd)

3.4 Grading - 2022
Unmitigated Construction Off-Site

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0856	0.0589	0.6784	2.0800e-003	0.2236	1.7500e-003	0.2253	0.0593	1.6100e-003	0.0609	206.9139	206.9139	5.7000e-003	5.7000e-003	207.0563	207.0563	207.0563
Total	0.0856	0.0589	0.6784	2.0800e-003	0.2236	1.7500e-003	0.2253	0.0593	1.6100e-003	0.0609	206.9139	206.9139	5.7000e-003	5.7000e-003	207.0563	207.0563	207.0563

Mitigated Construction On-Site

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

SWRCC-18
(cont'd)

3.4 Grading - 2022

Mitigated Construction Off-Site

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0896	0.0589	0.6784	2.0800e-003	0.2236	1.7500e-003	0.2253	0.0593	1.6100e-003	0.0609	206.9139	206.9139	5.7000e-003	5.7000e-003	207.0563	207.0563	207.0563
Total	0.0896	0.0589	0.6784	2.0800e-003	0.2236	1.7500e-003	0.2253	0.0593	1.6100e-003	0.0609	206.9139	206.9139	5.7000e-003	5.7000e-003	207.0563	207.0563	207.0563

3.5 Building Construction - 2022

Unmitigated Construction On-Site

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

SWRCC-18
(cont'd)

3.5 Building Construction - 2022
Unmitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000
Vendor	0.4284	13.1673	3.8005	0.0354	0.9155	0.0256	0.9412	0.2636	0.0245	0.2881	0	3,789.075	0	0.2381		3,795.028
Worker	3.5872	2.3593	27.1680	0.0832	8.9533	0.0701	9.0234	2.3745	0.0646	2.4390	3	8,286.901	3	0.2282		8,292.605
Total	4.0156	15.5266	30.9685	0.1186	9.8688	0.0957	9.9645	2.6381	0.0891	2.7271	63	12,075.97	63	0.4663		12,087.63

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Off-Road	1.7062	15.6156	16.3634	0.0269		0.8090	0.8090		0.7612	0.7612	0.0000	2,554.333	6	0.6120		2,569.632
Total	1.7062	15.6156	16.3634	0.0269		0.8090	0.8090		0.7612	0.7612	0.0000	2,554.333	6	0.6120		2,569.632

SWRCC-18
(cont'd)

3.5 Building Construction - 2022
Mitigated Construction Off-Site

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.4284	13.1673	3.8005	0.0354	0.9155	0.0256	0.9412	0.2636	0.0245	0.2881	0	3,789.075	0	3,789.075	0.2381	3,795.028	9
Worker	3.5872	2.3593	27.1680	0.0832	8.9533	0.0701	9.0234	2.3745	0.0646	2.4390	3	8,286.901	3	8,286.901	0.2282	8,292.605	8
Total	4.0156	15.5266	30.9685	0.1186	9.8688	0.0957	9.9645	2.6381	0.0891	2.7271	63	12,075.97	63	12,075.97	0.4663	12,087.63	41

3.5 Building Construction - 2023
Unmitigated Construction On-Site

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Off-Road	1.5728	14.3849	16.2440	0.0269	0.6997	0.6997	0.6997	0.6584	0.6584	0.6584	9	2,555.209	9	2,555.209	0.6079	2,570.406	1
Total	1.5728	14.3849	16.2440	0.0269	0.6997	0.6997	0.6997	0.6584	0.6584	0.6584	9	2,555.209	9	2,555.209	0.6079	2,570.406	1

SWRCC-18
(cont'd)

**3.5 Building Construction - 2023
 Unmitigated Construction Off-Site**

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.3183	9.9726	3.3771	0.0343	0.9156	0.0122	0.9277	0.2636	0.0116	0.2752	3,671,400 ⁷	3,671,400 ⁷	3,671,400 ⁷	0.2096		3,672,641 ⁷	
Worker	3.3795	2.1338	24.9725	0.0801	8.9533	0.0581	9.0214	2.3745	0.0627	2.4372	7,983,731 ⁸	7,983,731 ⁸	7,983,731 ⁸	0.2055		7,985,868 ⁸	
Total	3.6978	12.1065	28.3496	0.1144	9.8688	0.0803	9.9491	2.6381	0.0743	2.7124	11,655.13²⁵	11,655.13²⁵	11,655.13²⁵	0.4151		11,665.50⁹⁹	

Mitigated Construction On-Site

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Off-Road	1.5728	14.3849	16.2440	0.0269		0.6997	0.6997		0.6584	0.6584	0.0000	2,555.209 ⁹	2,555.209 ⁹	0.6079		2,570.406 ¹	
Total	1.5728	14.3849	16.2440	0.0269		0.6997	0.6997		0.6584	0.6584	0.0000	2,555.209⁹	2,555.209⁹	0.6079		2,570.406¹	

SWRCC-18
 (cont'd)

3.5 Building Construction - 2023
Mitigated Construction Off-Site

Category	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.3183	9.9726	3.3771	0.0343	0.9156	0.0122	0.9277	0.2636	0.0116	0.2752	3,671,400 ⁷	3,671,400 ⁷	3,671,400 ⁷	0.2096		3,672,641 ⁷
Worker	3.3795	2.1338	24.9725	0.0801	8.9533	0.0581	9.0214	2.3745	0.0627	2.4372	7,983,731 ⁸	7,983,731 ⁸	7,983,731 ⁸	0.2055		7,985,868 ⁸
Total	3.6978	12.1065	28.3496	0.1144	9.8688	0.0803	9.9491	2.6381	0.0743	2.7124	11,655.13²⁵	11,655.13²⁵	11,655.13²⁵	0.4151		11,665.50⁹⁹

3.6 Paving - 2023
Unmitigated Construction On-Site

Category	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Off-Road	1.0327	10.1917	14.5842	0.0228		0.5102	0.5102		0.4694	0.4694	2,207,584 ¹	2,207,584 ¹	2,207,584 ¹	0.7140		2,225.433 ⁶
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	1.0327	10.1917	14.5842	0.0228		0.5102	0.5102		0.4694	0.4694	2,207,584¹	2,207,584¹	2,207,584¹	0.7140		2,225.433⁶

SWRCC-18
(cont'd)

3.6 Paving - 2023
Unmitigated Construction Off-Site

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0633	0.0400	0.4677	1.5000e-003	0.1677	1.2800e-003	0.1689	0.0445	1.1700e-003	0.0456	148.5081	148.5081	148.5081	3.8500e-003		148.6043	
Total	0.0633	0.0400	0.4677	1.5000e-003	0.1677	1.2800e-003	0.1689	0.0445	1.1700e-003	0.0456	148.5081	148.5081	148.5081	3.8500e-003		149.6043	

Mitigated Construction On-Site

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Off-Road	1.0327	10.1917	14.5842	0.0228		0.5102	0.5102		0.4694	0.4694	0.0000	2,207.584 ₁	2,207.584 ₁	0.7140		2,225.433 ₆	
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000	
Total	1.0327	10.1917	14.5842	0.0228		0.5102	0.5102		0.4694	0.4694	0.0000	2,207.584₁	2,207.584₁	0.7140		2,225.433₆	

SWRCC-18
(cont'd)

3.6 Paving - 2023

Mitigated Construction Off-Site

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0633	0.0400	0.4677	1.5000e-003	0.1677	1.2800e-003	0.1689	0.0445	1.1700e-003	0.0456	148.5081	148.5081	3.8500e-003	0.0000	0.0000	148.6043	0.0000
Total	0.0633	0.0400	0.4677	1.5000e-003	0.1677	1.2800e-003	0.1689	0.0445	1.1700e-003	0.0456	148.5081	148.5081	3.8500e-003	0.0000	0.0000	149.6043	0.0000

3.6 Paving - 2024

Unmitigated Construction On-Site

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Off-Road	0.9882	9.5246	14.6258	0.0228	0.4685	0.4685	0.4685	0.4310	0.4310	0.4310	2,207.547 ₂	2,207.547 ₂	2,207.547 ₂	0.7140	0.0000	2,225.396 ₃	0.0000
Paving	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.9882	9.5246	14.6258	0.0228	0.4685	0.4685	0.4685	0.4310	0.4310	0.4310	2,207.547₂	2,207.547₂	2,207.547₂	0.7140	0.0000	2,225.396₃	0.0000

SWRCC-18
(cont'd)

3.6 Paving - 2024

Unmitigated Construction Off-Site

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0601	0.0364	0.4354	1.4500e-003	0.1677	1.2600e-003	0.1689	0.0445	1.1600e-003	0.0456	144.8706	144.8706	3.5300e-003	0.0000	0.0000	144.9587	144.9587
Total	0.0601	0.0364	0.4354	1.4500e-003	0.1677	1.2600e-003	0.1689	0.0445	1.1600e-003	0.0456	144.8706	144.8706	3.5300e-003	0.0000	0.0000	144.9587	144.9587

Mitigated Construction On-Site

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Off-Road	0.9882	9.5246	14.6258	0.0228	0.4685	0.4685	0.4685	0.4310	0.4310	0.4310	0.0000	2.207.547 ²	2.207.547 ²	0.7140	0.0000	2.225.396 ³	2.225.396 ³
Paving	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.9882	9.5246	14.6258	0.0228	0.4685	0.4685	0.4685	0.4310	0.4310	0.4310	0.0000	2.207.547²	2.207.547²	0.7140	0.0000	2.225.396³	2.225.396³

SWRCC-18
(cont'd)

3.6 Paving - 2024

Mitigated Construction Off-Site

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0601	0.0364	0.4354	1.4500e-003	0.1677	1.2600e-003	0.1689	0.0445	1.1600e-003	0.0456	144.8706	144.8706	3.5300e-003	0.0000	0.0000	144.9587	144.9587
Total	0.0601	0.0364	0.4354	1.4500e-003	0.1677	1.2600e-003	0.1689	0.0445	1.1600e-003	0.0456	144.8706	144.8706	3.5300e-003	0.0000	0.0000	144.9587	144.9587

3.7 Architectural Coating - 2024

Unmitigated Construction On-Site

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Archit. Coating	236.4115					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000	0.0000
Off-Road	0.1808	1.2188	1.8101	2.9700e-003		0.0609	0.0609		0.0609	0.0609	281.4481	281.4481	0.0159	0.0159		281.8443	281.8443
Total	236.5923	1.2188	1.8101	2.9700e-003		0.0609	0.0609		0.0609	0.0609	281.4481	281.4481	0.0159	0.0159		281.8443	281.8443

SWRCC-18
(cont'd)

3.7 Architectural Coating - 2024
Unmitigated Construction Off-Site

Category	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.6406	0.3886	4.6439	0.0155	1.7884	0.0134	1.8018	0.4743	0.0123	0.4866	1,545,286	0	1,545,286	0.0376	0	1,546,226
Total	0.6406	0.3886	4.6439	0.0155	1.7884	0.0134	1.8018	0.4743	0.0123	0.4866	1,545,286	0	1,545,286	0.0376	0	1,546,226

Mitigated Construction On-Site

Category	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Archit. Coating	236.4115					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1808	1.2188	1.8101	2.9700e-003		0.0609	0.0609		0.0609	0.0609	0.0000	281.4481	281.4481	0.0159		281.8443
Total	236.5923	1.2188	1.8101	2.9700e-003		0.0609	0.0609		0.0609	0.0609	0.0000	281.4481	281.4481	0.0159		281.8443

SWRCC-18
(cont'd)

**3.7 Architectural Coating - 2024
 Mitigated Construction Off-Site**

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.6406	0.3886	4.6439	0.0155	1.7884	0.0134	1.8018	0.4743	0.0123	0.4866	1,545,286	0	1,545,286	0.0376	0	1,546,226	2
Total	0.6406	0.3886	4.6439	0.0155	1.7884	0.0134	1.8018	0.4743	0.0123	0.4866	1,545,286	0	1,545,286	0.0376	0	1,546,226	2

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

SWRCC-18
 (cont'd)

Category	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Mitigated	9.5233	45.9914	110.0422	0.4681	45.9992	0.3373	46.2965	12.2950	0.3132	12.6083		47,917.80 05	47,917.80 05	2.1953		47,972.68 39
Unmitigated	9.5233	45.9914	110.0422	0.4681	45.9992	0.3373	46.2965	12.2950	0.3132	12.6083		47,917.80 05	47,917.80 05	2.1953		47,972.68 39

4.2 Trip Summary Information

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

4.3 Trip Type Information

SWRCC-18
(cont'd)

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

Land Use	Miles								Trip %				Trip Purpose %			
	H-W or C-W	H-S or C-C	H-O or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-C	H-O or C-NW	Primary	Diverted	Pass-by	
Apartments Low Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3							
Apartments Mid Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3							
General Office Building	16.60	8.40	6.90	33.00	48.00	19.00	77	19	4							
High Turnover (Sit Down Hotel)	16.60	8.40	6.90	8.50	72.50	19.00	37	20	43							
Quality Restaurant	16.60	8.40	6.90	19.40	61.60	19.00	58	38	4							
Regional Shopping Center	16.60	8.40	6.90	12.00	66.00	19.00	38	18	44							
Regional Shopping Center	16.60	8.40	6.90	16.30	64.70	19.00	54	35	11							

4.4 Fleet Mix

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

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

SWRCC-18
(cont'd)

Category	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Natural Gas Mitigated	0.7660	6.7462	4.2573	0.0418	0.5292	0.5292	0.5292	0.5292	0.5292	0.5292	0.355983	0.355983	0.355983	0.1602	0.1532	8,405.6387
Natural Gas Unmitigated	0.7660	6.7462	4.2573	0.0418	0.5292	0.5292	0.5292	0.5292	0.5292	0.5292	0.355983	0.355983	0.355983	0.1602	0.1532	8,405.6387

SWRCC-18
(cont'd)

**5.2 Energy by Land Use - NaturalGas
 Unmitigated**

Land Use	NaturalGas Use kBTU/yr	lb/day										lb/day			CO2e		
		ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2		CH4	N2O
Apartments Low Rise	1119.16	0.0121	0.1031	0.0439	6.6000e-004	8.3400e-003	8.3400e-003	8.3400e-003	8.3400e-003	8.3400e-003	8.3400e-003	131.6662	131.6662	131.6662	2.5200e-003	2.4100e-003	132.4486
Apartments Mid Rise	35764.3	0.3659	3.2976	1.4033	0.0211	0.2666	0.2666	0.2666	0.2666	0.2666	0.2666	4,209.9164	4,209.9164	4,209.9164	0.0807	0.0772	4,234.8339
General Office Building	1283.42	0.0138	0.1258	0.1057	7.5000e-004	9.5600e-003	9.5600e-003	9.5600e-003	9.5600e-003	9.5600e-003	9.5600e-003	150.9911	150.9911	150.9911	2.8900e-003	2.7700e-003	151.8684
High Turnover (Sit Down Restaurant)	22759.9	0.2455	2.2314	1.8743	0.0184	0.1696	0.1696	0.1696	0.1696	0.1696	0.1696	2,677.6342	2,677.6342	2,677.6342	0.0513	0.0491	2,693.5460
Hotel	4769.72	0.0514	0.4676	0.3928	2.8100e-003	0.0355	0.0355	0.0355	0.0355	0.0355	0.0355	561.1436	561.1436	561.1436	0.0108	0.0103	564.4782
Quality Restaurant	5057.75	0.0545	0.4959	0.4165	2.8000e-003	0.0377	0.0377	0.0377	0.0377	0.0377	0.0377	595.0290	595.0290	595.0290	0.0114	0.0109	596.5658
Regional Shopping Center	251.616	2.7100e-003	0.0247	0.0207	1.5000e-004	1.8700e-003	1.8700e-003	1.8700e-003	1.8700e-003	1.8700e-003	1.8700e-003	29.6019	29.6019	29.6019	5.7000e-004	5.4000e-004	29.7778
Total		0.7660	6.7463	4.2573	0.0418	0.5292	0.5292	0.5292	0.5292	0.5292	0.5292	8,355.9832	8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387

SWRCC-18
(cont'd)

5.2 Energy by Land Use - NaturalGas Mitigated

Land Use	NaturalGas Use kBTU/yr	lb/day										CO ₂ e					
		ROG	NOx	CO	SO ₂	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total		Bio- CO ₂	NBio- CO ₂	Total CO ₂	CH ₄	N ₂ O
Apartments Low Rise	1.11916	0.0121	0.1031	0.0439	6.6000e-004	8.3400e-003	8.3400e-003	8.3400e-003	8.3400e-003	8.3400e-003	8.3400e-003	131.6662	131.6662	131.6662	2.5200e-003	2.4100e-003	132.4486
Apartments Mid Rise	33.7843	0.3859	3.2978	1.4033	0.0211	0.2666	0.2666	0.2666	0.2666	0.2666	0.2666	4,209.9164	4,209.9164	4,209.9164	0.0807	0.0772	4,234.8339
General Office Building	1.26342	0.0138	0.1258	0.1057	7.5000e-004	9.5600e-003	9.5600e-003	9.5600e-003	9.5600e-003	9.5600e-003	9.5600e-003	150.9911	150.9911	150.9911	2.8900e-003	2.7700e-003	151.8684
High Turnover (Sit Down Restaurant)	22.7599	0.2455	2.2314	1.8743	0.0194	0.1696	0.1696	0.1696	0.1696	0.1696	0.1696	2,677.6342	2,677.6342	2,677.6342	0.0513	0.0491	2,693.5460
Hotel	4.76972	0.0514	0.4676	0.3928	2.8100e-003	0.0355	0.0355	0.0355	0.0355	0.0355	0.0355	561.1436	561.1436	561.1436	0.0108	0.0103	564.4782
Quality Restaurant	5.05775	0.0545	0.4959	0.4165	2.8000e-003	0.0377	0.0377	0.0377	0.0377	0.0377	0.0377	595.0290	595.0290	595.0290	0.0114	0.0109	596.5658
Regional Shopping Center	0.251616	2.7100e-003	0.0247	0.0207	1.5000e-004	1.8700e-003	1.8700e-003	1.8700e-003	1.8700e-003	1.8700e-003	1.8700e-003	29.6019	29.6019	29.6019	5.7000e-004	5.4000e-004	29.7778
Total		0.7660	6.7463	4.2573	0.0418	0.5292	0.5292	0.5292	0.5292	0.5292	0.5292	8,355.9832	8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387

6.0 Area Detail

6.1 Mitigation Measures Area

SWRCC-18
(cont'd)

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Mitigated	30.5020	15.0496	88.4430	0.0944	1.5974	1.5974	1.5974	1.5974	1.5974	1.5974	0.0000	18,148.59	18,148.59	0.4874	0.3300	18,259.11
Unmitigated	30.5020	15.0496	88.4430	0.0944	1.5974	1.5974	1.5974	1.5974	1.5974	1.5974	0.0000	18,148.59	18,148.59	0.4874	0.3300	18,259.11

6.2 Area by SubCategory

Unmitigated

SubCategory	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Architectural Coating	2.2670				0.0000	0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	24.1065				0.0000	0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Heath	1.6500	14.1000	6.0000	0.0900	1.1400	1.1400	1.1400	1.1400	1.1400	1.1400	0.0000	18,000.00	18,000.00	0.3450	0.3300	18,106.96
Landscaping	2.4766	0.9496	82.4430	4.3600e-003	0.4574	0.4574	0.4574	0.4574	0.4574	0.4574		148.5950	148.5950	0.1424		152.1542
Total	30.5020	15.0496	88.4430	0.0944	1.5974	1.5974	1.5974	1.5974	1.5974	1.5974	0.0000	18,148.59	18,148.59	0.4874	0.3300	18,259.11

SWRCC-18
(cont'd)

**6.2 Area by SubCategory
 Mitigated**

SubCategory	lb/day										lb/day					
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Architectural Coating	2.2670					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	24.1085					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	1.6500	14.1000	6.0000	0.0900	1.1400	1.1400	1.1400	1.1400	1.1400	1.1400	0.0000	18,000.00	18,000.00	0.3450	0.3300	18,106.96
Landscaping	2.4786	0.9496	82.4430	4.3600e-003		0.4574	0.4574	0.4574	0.4574	0.4574		148.5950	148.5950	0.1424		152.1542
Total	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974	1.5974	1.5974	1.5974	0.0000	18,148.59	18,148.59	0.4874	0.3300	18,259.11

7.0 Water Detail

7.1 Mitigation Measures Water

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

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

10.0 Stationary Equipment

SWRCC-18
(cont'd)

Fire Pumps and Emergency Generators

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

Boilers

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

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

SWRCC-18
 (cont'd)

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

1.0 Project Characteristics

1.1 Land Usage

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

1.2 Other Project Characteristics

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

1.3 User Entered Comments & Non-Default Data

SWRCC-18
 (cont'd)

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

- Project Characteristics - Consistent with the DEIR's model.
- Land Use - See SWAPE comment regarding residential and retail land uses.
- Construction Phase - See SWAPE comment regarding individual construction phase lengths.
- Demolition - Consistent with the DEIR's model. See SWAPE comment regarding demolition.
- Vehicle Trips - Saturday trips consistent with the DEIR's model. See SWAPE comment regarding weekday and Sunday trips.
- Woodstoves - Woodstoves and wood-burning fireplaces consistent with the DEIR's model. See SWAPE comment regarding gas fireplaces.
- Energy Use -
- Construction Off-road Equipment Mitigation - See SWAPE comment on construction-related mitigation.
- Area Mitigation - See SWAPE comment regarding operational mitigation measures.
- Water Mitigation - See SWAPE comment regarding operational mitigation measures.
- Trips and VMT - Local hire provision

Table Name	Column Name	Default Value	New Value
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	NumberWood	1.25	0.00
tblFireplaces	NumberWood	48.75	0.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblVehicleTrips	ST_TR	7.16	6.17
tblVehicleTrips	ST_TR	6.39	3.87
tblVehicleTrips	ST_TR	2.46	1.39
tblVehicleTrips	ST_TR	158.37	79.82

SWRCC-18
(cont'd)

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

tbVehicleTrips	ST_TR	8.19	3.75
tbVehicleTrips	ST_TR	94.36	63.99
tbVehicleTrips	ST_TR	49.97	10.74
tbVehicleTrips	SU_TR	5.07	6.16
tbVehicleTrips	SU_TR	5.86	4.18
tbVehicleTrips	SU_TR	1.05	0.69
tbVehicleTrips	SU_TR	131.84	78.27
tbVehicleTrips	SU_TR	5.95	3.20
tbVehicleTrips	SU_TR	72.16	57.65
tbVehicleTrips	SU_TR	25.24	6.39
tbVehicleTrips	WD_TR	5.59	5.83
tbVehicleTrips	WD_TR	5.65	4.13
tbVehicleTrips	WD_TR	11.03	6.41
tbVehicleTrips	WD_TR	127.15	65.60
tbVehicleTrips	WD_TR	8.17	3.84
tbVehicleTrips	WD_TR	89.95	62.64
tbVehicleTrips	WD_TR	42.70	9.43
tbWoodstoves	NumberCatalytic	1.25	0.00
tbWoodstoves	NumberCatalytic	48.75	0.00
tbWoodstoves	NumberNoncatalytic	1.25	0.00
tbWoodstoves	NumberNoncatalytic	48.75	0.00
tbWoodstoves	WoodstoveDayYear	25.00	0.00
tbWoodstoves	WoodstoveDayYear	25.00	0.00
tbWoodstoves	WoodstoveWoodMass	999.60	0.00
tbWoodstoves	WoodstoveWoodMass	999.60	0.00

2.0 Emissions Summary

SWRCC-18
(cont'd)

**2.1 Overall Construction
 Unmitigated Construction**

Year	tons/yr										MT/yr						
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
2021	0.1704	1.8234	1.1577	2.3800e-003	0.4141	0.0817	0.4958	0.1788	0.0754	0.2542	0.0000	210.7654	210.7654	0.0600	0.0000	0.0000	212.2661
2022	0.5865	4.0240	5.1546	0.0155	0.9509	0.1175	1.0683	0.2518	0.1103	0.3621	0.0000	1,418.655	1,418.655	0.1215	0.0000	0.0000	1,421.692
2023	0.5190	3.2850	4.7678	0.0147	0.8497	0.0971	0.9468	0.2283	0.0912	0.3195	0.0000	1,342.441	1,342.441	0.1115	0.0000	0.0000	1,345.229
2024	4.1592	0.1313	0.2557	5.0000e-004	0.0221	6.3900e-003	0.0285	5.8700e-003	5.9700e-003	0.0118	0.0000	44.6355	44.6355	7.8300e-003	0.0000	0.0000	44.8311
Maximum	4.1592	4.0240	5.1546	0.0155	0.9509	0.1175	1.0683	0.2518	0.1103	0.3621	0.0000	1,418.655	1,418.655	0.1215	0.0000	0.0000	1,421.692

SWRCC-18
 (cont'd)

**2.1 Overall Construction
 Mitigated Construction**

Year	tons/yr										MT/yr					
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
2021	0.1704	1.8234	1.1577	2.3800e-003	0.4141	0.0817	0.4958	0.1788	0.0754	0.2542	0.0000	210.7651	210.7651	0.0600	0.0000	212.2656
2022	0.5865	4.0240	5.1546	0.0155	0.9509	0.1175	1.0683	0.2518	0.1103	0.3621	0.0000	1,418,655	1,418,655	0.1215	0.0000	1,421,692
2023	0.5190	3.2850	4.7678	0.0147	0.8497	0.0971	0.9468	0.2283	0.0912	0.3195	0.0000	1,342,440	1,342,440	0.1115	0.0000	1,345,228
2024	4.1592	0.1313	0.2557	5.0000e-004	0.0221	6.3900e-003	0.0285	5.8700e-003	0.0118	0.0118	0.0000	44,6354	44,6354	7.8300e-003	0.0000	44,8311
Maximum	4.1592	4.0240	5.1546	0.0155	0.9509	0.1175	1.0683	0.2518	0.1103	0.3621	0.0000	1,418,655	1,418,655	0.1215	0.0000	1,421,692

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

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOx (tons/quarter)	Maximum Mitigated ROG + NOx (tons/quarter)
1	9-1-2021	11-30-2021	1,4091	1,4091
2	12-1-2021	2-28-2022	1,3329	1,3329
3	3-1-2022	5-31-2022	1,1499	1,1499
4	6-1-2022	8-31-2022	1,1457	1,1457
5	9-1-2022	11-30-2022	1,1415	1,1415
6	12-1-2022	2-28-2023	1,0278	1,0278
7	3-1-2023	5-31-2023	0,9868	0,9868
8	6-1-2023	8-31-2023	0,9851	0,9851

SWRCC-18
(cont'd)

9	9-1-2023	11-30-2023	0.9798	0.9798	0.9798
10	12-1-2023	2-29-2024	2.8757	2.8757	2.8757
11	3-1-2024	5-31-2024	1.6188	1.6188	1.6188
		Highest	2.8757	2.8757	2.8757

**2.2 Overall Operational
 Unmitigated Operational**

Category	tons/yr										MT/yr					
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Area	5.1437	0.2950	10.3804	1.6700e-003		0.0714	0.0714		0.0714	0.0714	0.0000	220.9670	220.9670	0.0201	3.7400e-003	222.5835
Energy	0.1388	1.2312	0.7770	7.5200e-003		0.0986	0.0986		0.0986	0.0986	0.0000	3.896073	3.896073	0.1303	0.0468	3.913283
Mobile	1.5857	7.9952	19.1634	0.0821	7.7979	0.0580	7.8559	2.0895	0.0539	2.1434	0.0000	7.620498	7.620498	0.3407	0.0000	7.623016
Waste						0.0000	0.0000		0.0000	0.0000	207.8079	0.0000	207.8079	12.2811	0.0000	514.8354
Water						0.0000	0.0000		0.0000	0.0000	29.1632	556.6420	585.8052	3.0183	0.0755	683.7567
Total	6.8692	9.5223	30.3407	0.0914	7.7979	0.2260	8.0240	2.0895	0.2219	2.3114	236.8712	12,294.1807	12,531.1519	15.7904	0.1260	12,963.4751

SWRCC-18
 (cont'd)

**2.2 Overall Operational
 Mitigated Operational**

Category	Tons/yr										MT/yr					
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Area	5.1437	0.2950	10.3804	1.6700e-003	0.0714	0.0714	0.0714	0.0714	0.0714	0.0714	0.0000	220.9670	220.9670	0.0201	3.7400e-003	222.5635
Energy	0.1398	1.2312	0.7770	7.6200e-003	0.0966	0.0966	0.0966	0.0966	0.0966	0.0966	0.0000	3,896.0732	3,896.0732	0.1303	0.0468	3,913.2633
Mobile	1.5857	7.9862	19.1834	0.0821	7.7979	0.0580	7.8559	2.0895	0.0539	2.1434	0.0000	7,620.4886	7,620.4886	0.3407	0.0000	7,629.0162
Waste					0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	207.8079	0.0000	207.8079	12.2811	0.0000	514.8364
Water					0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	29.1632	556.6420	585.8052	3.0183	0.0755	683.7567
Total	6.8692	9.5223	30.3407	0.0914	7.7979	0.2260	8.0240	2.0895	0.2219	2.3114	236.8712	12,294.1807	12,531.1519	15.7904	0.1260	12,963.4751

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

3.0 Construction Detail

Construction Phase

SWRCC-18
(cont'd)

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

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 112.5

Acres of Paving: 0

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

OffRoad Equipment

**SWRCC-18
(cont'd)**

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

Trips and VMT

SWRCC-18
(cont'd)

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

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	6	15.00	0.00	458.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	7	18.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	801.00	143.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	160.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Demolition - 2021

Unmitigated Construction On-Site

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

SWRCC-18
(cont'd)

3.2 Demolition - 2021
Unmitigated Construction Off-Site

Category	tons/yr										MT/yr					
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	1.9300e-003	0.0634	0.0148	1.8000e-004	3.9400e-003	1.9000e-004	4.1300e-003	1.0600e-003	1.8000e-004	1.2600e-003	0.0000	17.4566	17.4566	1.2100e-003	0.0000	17.4669
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	7.2000e-004	5.3000e-004	6.0900e-003	2.0000e-005	1.6800e-003	1.0000e-005	1.6900e-003	4.5000e-004	1.0000e-005	4.6000e-004	0.0000	1.5281	1.5281	5.0000e-005	0.0000	1.5293
Total	2.6500e-003	0.0639	0.0209	2.0000e-004	5.6200e-003	2.0000e-004	5.8200e-003	1.5300e-003	1.9000e-004	1.7200e-003	0.0000	18.9847	18.9847	1.2600e-003	0.0000	19.0161

Mitigated Construction On-Site

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

SWRCC-18
(cont'd)

3.2 Demolition - 2021
Mitigated Construction Off-Site

Category	tons/yr										MT/yr					
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	1.9300e-003	0.0634	0.0148	1.8000e-004	3.9400e-003	1.9000e-004	4.1300e-003	1.0600e-003	1.8000e-004	1.2600e-003	0.0000	17.4566	17.4566	1.2100e-003	0.0000	17.4669
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	7.2000e-004	5.3000e-004	6.0900e-003	2.0000e-005	1.6800e-003	1.0000e-005	1.6900e-003	4.5000e-004	1.0000e-005	4.6000e-004	0.0000	1.5281	1.5281	5.0000e-005	0.0000	1.5293
Total	2.6500e-003	0.0639	0.0209	2.0000e-004	5.6200e-003	2.0000e-004	5.8200e-003	1.5300e-003	1.9000e-004	1.7200e-003	0.0000	18.9847	18.9847	1.2600e-003	0.0000	19.0161

3.3 Site Preparation - 2021
Unmitigated Construction On-Site

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

SWRCC-18
(cont'd)

**3.3 Site Preparation - 2021
 Unmitigated Construction Off-Site**

Category	tons/yr											MT/yr				
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.8000e-004	4.3000e-004	4.8700e-003	1.0000e-005	1.3400e-003	1.0000e-005	1.3500e-003	3.6000e-004	1.0000e-005	3.7000e-004	0.0000	1.2225	1.2225	4.0000e-005	0.0000	1.2234
Total	5.8000e-004	4.3000e-004	4.8700e-003	1.0000e-005	1.3400e-003	1.0000e-005	1.3500e-003	3.6000e-004	1.0000e-005	3.7000e-004	0.0000	1.2225	1.2225	4.0000e-005	0.0000	1.2234

Mitigated Construction On-Site

Category	tons/yr											MT/yr				
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Fugitive Dust					0.1807	0.0000	0.1807	0.0983	0.0000	0.0983	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0389	0.4050	0.2115	3.8000e-004	0.0204	0.0204	0.0204	0.0188	0.0188	0.0188	0.0000	33.4357	33.4357	0.0108	0.0000	33.7060
Total	0.0389	0.4050	0.2115	3.8000e-004	0.1807	0.0204	0.2011	0.0983	0.0188	0.1181	0.0000	33.4357	33.4357	0.0108	0.0000	33.7060

SWRCC-18
(cont'd)

3.3 Site Preparation - 2021
Mitigated Construction Off-Site

Category	tons/yr										MT/yr					
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.8000e-004	4.3000e-004	4.8700e-003	1.0000e-005	1.3400e-003	1.0000e-005	1.3500e-003	3.6000e-004	1.0000e-005	3.7000e-004	0.0000	1.2225	1.2225	4.0000e-005	0.0000	1.2234
Total	5.8000e-004	4.3000e-004	4.8700e-003	1.0000e-005	1.3400e-003	1.0000e-005	1.3500e-003	3.6000e-004	1.0000e-005	3.7000e-004	0.0000	1.2225	1.2225	4.0000e-005	0.0000	1.2234

3.4 Grading - 2021
Unmitigated Construction On-Site

Category	tons/yr										MT/yr					
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Fugitive Dust					0.1741	0.0000	0.1741	0.0693	0.0000	0.0693	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0796	0.8816	0.5667	1.1800e-003	0.0377	0.0377	0.0377	0.0347	0.0347	0.0347	0.0000	103.5405	103.5405	0.0335	0.0000	104.3776
Total	0.0796	0.8816	0.5667	1.1800e-003	0.1741	0.0377	0.2118	0.0693	0.0347	0.1040	0.0000	103.5405	103.5405	0.0335	0.0000	104.3776

SWRCC-18
(cont'd)

3.4 Grading - 2021
Unmitigated Construction Off-Site

Category	tons/yr											MT/yr				
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.2200e-003	9.0000e-004	0.0103	3.0000e-005	2.8300e-003	2.8600e-005	2.8600e-003	7.5000e-004	2.0000e-005	7.8000e-004	0.0000	2.5808	2.5808	8.0000e-005	0.0000	2.5828
Total	1.2200e-003	9.0000e-004	0.0103	3.0000e-005	2.8300e-003	2.8600e-005	2.8600e-003	7.5000e-004	2.0000e-005	7.8000e-004	0.0000	2.5808	2.5808	8.0000e-005	0.0000	2.5828

Mitigated Construction On-Site

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

SWRCC-18
(cont'd)

3.4 Grading - 2021
Mitigated Construction Off-Site

Category	tons/yr											MT/yr				
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.2200e-003	9.0000e-004	0.0103	3.0000e-005	2.8300e-003	2.8600e-005	2.8600e-003	7.5000e-004	2.0000e-005	7.8000e-004	0.0000	2.5808	2.5808	8.0000e-005	0.0000	2.5828
Total	1.2200e-003	9.0000e-004	0.0103	3.0000e-005	2.8300e-003	2.8600e-005	2.8600e-003	7.5000e-004	2.0000e-005	7.8000e-004	0.0000	2.5808	2.5808	8.0000e-005	0.0000	2.5828

3.4 Grading - 2022
Unmitigated Construction On-Site

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

SWRCC-18
(cont'd)

3.4 Grading - 2022
Unmitigated Construction Off-Site

Category	tons/yr										MT/yr					
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.1000e-004	1.5000e-004	1.7400e-003	1.0000e-005	5.2000e-004	0.0000	5.3000e-004	1.4000e-004	0.0000	1.4000e-004	0.0000	0.4587	0.4587	1.0000e-005	0.0000	0.4590
Total	2.1000e-004	1.5000e-004	1.7400e-003	1.0000e-005	5.2000e-004	0.0000	5.3000e-004	1.4000e-004	0.0000	1.4000e-004	0.0000	0.4587	0.4587	1.0000e-005	0.0000	0.4590

Mitigated Construction On-Site

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

SWRCC-18
(cont'd)

3.4 Grading - 2022

Mitigated Construction Off-Site

Category	tons/yr										MT/yr					
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.1000e-004	1.5000e-004	1.7400e-003	1.0000e-005	5.2000e-004	0.0000	5.3000e-004	1.4000e-004	0.0000	1.4000e-004	0.0000	0.4587	0.4587	1.0000e-005	0.0000	0.4590
Total	2.1000e-004	1.5000e-004	1.7400e-003	1.0000e-005	5.2000e-004	0.0000	5.3000e-004	1.4000e-004	0.0000	1.4000e-004	0.0000	0.4587	0.4587	1.0000e-005	0.0000	0.4590

3.5 Building Construction - 2022

Unmitigated Construction On-Site

Category	tons/yr										MT/yr					
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Off-Road	0.2158	1.9754	2.0700	3.4100e-003		0.1023	0.1023		0.0963	0.0963	0.0000	293.1324	283.1324	0.0702	0.0000	294.8881
Total	0.2158	1.9754	2.0700	3.4100e-003		0.1023	0.1023		0.0963	0.0963	0.0000	293.1324	283.1324	0.0702	0.0000	294.8881

SWRCC-18
(cont'd)

3.5 Building Construction - 2022
Unmitigated Construction Off-Site

Category	tons/yr										MT/yr					
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0527	1.6961	0.4580	4.5500e-003	0.1140	3.1800e-003	0.1171	0.0329	3.0400e-003	0.0359	0.0000	441.9835	441.9835	0.0264	0.0000	442.6435
Worker	0.3051	0.2164	2.5233	7.3500e-003	0.7557	6.2300e-003	0.7619	0.2007	5.7400e-003	0.2065	0.0000	663.9836	663.9836	0.0187	0.0000	664.4604
Total	0.3578	1.9125	2.9812	0.0119	0.8688	9.4100e-003	0.8790	0.2336	8.7800e-003	0.2424	0.0000	1,105.9771	1,105.9771	0.0451	0.0000	1,107.1039

Mitigated Construction On-Site

Category	tons/yr										MT/yr					
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Off-Road	0.2158	1.9754	2.0700	3.4100e-003		0.1023	0.1023		0.0963	0.0963	0.0000	293.1321	283.1321	0.0702	0.0000	294.8877
Total	0.2158	1.9754	2.0700	3.4100e-003		0.1023	0.1023		0.0963	0.0963	0.0000	293.1321	283.1321	0.0702	0.0000	294.8877

SWRCC-18
(cont'd)

3.5 Building Construction - 2022
Mitigated Construction Off-Site

Category	tons/yr										MT/yr					
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0527	1.6961	0.4580	4.5500e-003	3.1800e-003	0.1171	0.0329	3.0400e-003	0.0359	441.9835	441.9835	0.0264	0.0000	0.0000	0.0000	442.6435
Worker	0.3051	0.2164	2.5233	7.3500e-003	6.2300e-003	0.7619	0.2007	5.7400e-003	0.2065	663.9836	663.9836	0.0187	0.0000	0.0000	0.0000	664.4604
Total	0.3578	1.9125	2.9812	0.0119	0.8695	0.8790	0.2336	8.7800e-003	0.2424	1,105.9771	1,105.9771	0.0451	0.0000	0.0000	0.0000	1,107.1039

3.5 Building Construction - 2023
Unmitigated Construction On-Site

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

SWRCC-18
(cont'd)

3.5 Building Construction - 2023
Unmitigated Construction Off-Site

Category	tons/yr										MT/yr					
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0382	1.2511	0.4011	4.3000e-003	1.4600e-003	0.1127	0.0321	1.4000e-003	0.0335	0.0335	0.0000	417.9930	417.9930	0.0228	0.0000	418.5624
Worker	0.2795	0.1910	2.2635	6.9100e-003	5.9100e-003	0.7436	0.1960	5.4500e-003	0.2014	0.2014	0.0000	624.5363	624.5363	0.0164	0.0000	624.9466
Total	0.3177	1.4420	2.6646	0.0112	0.8490	0.8564	0.2281	6.8500e-003	0.2349	0.2349	0.0000	1,042.5294	1,042.5294	0.0392	0.0000	1,043.5090

Mitigated Construction On-Site

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

SWRCC-18
(cont'd)

3.5 Building Construction - 2023
Mitigated Construction Off-Site

Category	tons/yr										MT/yr					
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0382	1.2511	0.4011	4.3000e-003	1.4600e-003	0.1127	0.0321	1.4000e-003	0.0335	0.0000	417.9930	417.9930	0.0228	0.0000	0.0000	418.5624
Worker	0.2795	0.1910	2.2635	6.9100e-003	5.9100e-003	0.7436	0.1980	5.4500e-003	0.2014	0.0000	624.5363	624.5363	0.0164	0.0000	0.0000	624.9466
Total	0.3177	1.4420	2.6646	0.0112	0.8490	0.8564	0.2281	6.8500e-003	0.2349	0.0000	1,042.5294	1,042.5294	0.0392	0.0000	0.0000	1,043.5090

3.6 Paving - 2023
Unmitigated Construction On-Site

Category	tons/yr										MT/yr					
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Off-Road	6.7100e-003	0.0653	0.0948	1.5000e-004	3.3200e-003	3.3200e-003	3.3200e-003	3.0500e-003	3.0500e-003	3.0500e-003	0.0000	13.0175	13.0175	4.2100e-003	0.0000	13.1227
Paving	0.0000					0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	6.7100e-003	0.0653	0.0948	1.5000e-004	3.3200e-003	3.3200e-003	3.3200e-003	3.0500e-003	3.0500e-003	3.0500e-003	0.0000	13.0175	13.0175	4.2100e-003	0.0000	13.1227

SWRCC-18
(cont'd)

3.6 Paving - 2023
Unmitigated Construction Off-Site

Category	tons/yr										MT/yr					
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.8000e-004	1.9000e-004	2.2300e-003	1.0000e-005	7.3000e-004	1.0000e-005	7.3000e-004	1.9000e-004	1.0000e-005	2.0000e-004	0.0000	0.6156	0.6156	2.0000e-005	0.0000	0.6160
Total	2.8000e-004	1.9000e-004	2.2300e-003	1.0000e-005	7.3000e-004	1.0000e-005	7.3000e-004	1.9000e-004	1.0000e-005	2.0000e-004	0.0000	0.6156	0.6156	2.0000e-005	0.0000	0.6160

Mitigated Construction On-Site

Category	tons/yr										MT/yr					
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Off-Road	6.7100e-003	0.0653	0.0948	1.5000e-004	3.3200e-003	3.3200e-003	3.3200e-003	3.0500e-003	3.0500e-003	3.0500e-003	0.0000	13.0175	13.0175	4.2100e-003	0.0000	13.1227
Paving	0.0000					0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	6.7100e-003	0.0653	0.0948	1.5000e-004	3.3200e-003	3.3200e-003	3.3200e-003	3.0500e-003	3.0500e-003	3.0500e-003	0.0000	13.0175	13.0175	4.2100e-003	0.0000	13.1227

SWRCC-18
(cont'd)

3.6 Paving - 2023

Mitigated Construction Off-Site

Category	tons/yr											MT/yr				
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.8000e-004	1.9000e-004	2.2300e-003	1.0000e-005	7.3000e-004	1.0000e-005	7.3000e-004	1.9000e-004	1.0000e-005	2.0000e-004	0.0000	0.6156	0.6156	2.0000e-005	0.0000	0.6160
Total	2.8000e-004	1.9000e-004	2.2300e-003	1.0000e-005	7.3000e-004	1.0000e-005	7.3000e-004	1.9000e-004	1.0000e-005	2.0000e-004	0.0000	0.6156	0.6156	2.0000e-005	0.0000	0.6160

3.6 Paving - 2024

Unmitigated Construction On-Site

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

SWRCC-18
(cont'd)

3.6 Paving - 2024
Unmitigated Construction Off-Site

Category	tons/yr											MT/yr				
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	4.4000e-004	2.8000e-004	3.5100e-003	1.0000e-005	1.2300e-003	1.0000e-005	1.2400e-003	3.3000e-004	1.0000e-005	3.4000e-004	0.0000	1.0084	1.0084	3.0000e-005	0.0000	1.0100
Total	4.4000e-004	2.8000e-004	3.5100e-003	1.0000e-005	1.2300e-003	1.0000e-005	1.2400e-003	3.3000e-004	1.0000e-005	3.4000e-004	0.0000	1.0084	1.0084	3.0000e-005	0.0000	1.0100

Mitigated Construction On-Site

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

SWRCC-18
(cont'd)

3.6 Paving - 2024

Mitigated Construction Off-Site

Category	tons/yr											MT/yr				
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	4.4000e-004	2.8000e-004	3.5100e-003	1.0000e-005	1.2300e-003	1.0000e-005	1.2400e-003	3.3000e-004	1.0000e-005	3.4000e-004	0.0000	1.0084	1.0084	3.0000e-005	0.0000	1.0100
Total	4.4000e-004	2.8000e-004	3.5100e-003	1.0000e-005	1.2300e-003	1.0000e-005	1.2400e-003	3.3000e-004	1.0000e-005	3.4000e-004	0.0000	1.0084	1.0084	3.0000e-005	0.0000	1.0100

3.7 Architectural Coating - 2024

Unmitigated Construction On-Site

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

SWRCC-18
(cont'd)

3.7 Architectural Coating - 2024
Unmitigated Construction Off-Site

Category	tons/yr											MT/yr				
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	7.4800e-003	4.8300e-003	0.0586	1.9000e-004	0.0209	1.6000e-004	0.0211	5.5500e-003	1.5000e-004	5.7000e-003	0.0000	17.1287	17.1287	4.3000e-004	0.0000	17.1384
Total	7.4800e-003	4.8300e-003	0.0586	1.9000e-004	0.0209	1.6000e-004	0.0211	5.5500e-003	1.5000e-004	5.7000e-003	0.0000	17.1287	17.1287	4.3000e-004	0.0000	17.1384

Mitigated Construction On-Site

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

SWRCC-18
(cont'd)

3.7 Architectural Coating - 2024
Mitigated Construction Off-Site

Category	tons/yr										MT/yr					
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	7.4800e-003	4.8300e-003	0.0586	1.9000e-004	0.0209	1.6000e-004	0.0211	5.5500e-003	1.5000e-004	5.7000e-003	0.0000	17.1287	17.1287	4.3000e-004	0.0000	17.1384
Total	7.4800e-003	4.8300e-003	0.0586	1.9000e-004	0.0209	1.6000e-004	0.0211	5.5500e-003	1.5000e-004	5.7000e-003	0.0000	17.1287	17.1287	4.3000e-004	0.0000	17.1384

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

SWRCC-18
(cont'd)

Category	tons/yr											MT/yr				
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Mitigated	1.5857	7.9862	19.1834	0.0821	7.7979	0.0580	7.8559	2.0895	0.0539	2.1434	0.0000	7,620,498	7,620,498	0.3407	0.0000	7,629,016
Unmitigated	1.5857	7.9862	19.1834	0.0821	7.7979	0.0580	7.8559	2.0895	0.0539	2.1434	0.0000	7,620,498	7,620,498	0.3407	0.0000	7,629,016

4.2 Trip Summary Information

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

4.3 Trip Type Information

SWRCC-18
(cont'd)

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

Land Use	Miles						Trip %						Trip Purpose %			
	H-W or C-W	H-S or C-C	H-O or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-C	H-O or C-NW	Primary	Diverted	Pass-by	
Apartments Low Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3							
Apartments Mid Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3							
General Office Building	16.60	8.40	6.90	33.00	48.00	19.00	77	19	4							
High Turnover (Sit Down Hotel)	16.60	8.40	6.90	8.50	72.50	19.00	37	20	43							
Quality Restaurant	16.60	8.40	6.90	19.40	61.60	19.00	58	38	4							
Regional Shopping Center	16.60	8.40	6.90	12.00	66.00	19.00	38	18	44							
	16.60	8.40	6.90	16.30	64.70	19.00	54	35	11							

4.4 Fleet Mix

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

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

SWRCC-18
(cont'd)

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

SWRCC-18
(cont'd)

**5.2 Energy by Land Use - NaturalGas
 Unmitigated**

Land Use	NaturalGas Use kBTU/yr	tons/yr										MT/yr						
		ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Apartments Low Rise	408494	2.2000e-003	0.0188	8.0100e-003	1.2000e-004	1.5200e-003	1.5200e-003	1.5200e-003	0.0487	0.0487	0.0487	1.5200e-003	0.0000	21.7988	21.7988	4.2000e-004	4.0000e-004	21.9284
Apartments Mid Rise	1.50512e+007	0.0704	0.6018	0.2561	3.6400e-003	0.0487	0.0487	0.0487	0.0487	0.0487	0.0487	0.0000	696.9989	696.9989	0.0134	0.0128	701.1408	
General Office Building	468450	2.5300e-003	0.0230	0.0193	1.4000e-004	1.7500e-003	1.7500e-003	1.7500e-003	0.0310	0.0310	0.0310	0.0000	24.9883	24.9883	4.8000e-004	4.6000e-004	25.1468	
High Turnover (Sit Down Restaurant)	8.30736e+006	0.0448	0.4072	0.3421	2.4400e-003	0.0310	0.0310	0.0310	0.0310	0.0310	0.0310	0.0000	443.3124	443.3124	8.5000e-003	8.1300e-003	445.9468	
Hotel	1.74095e+006	9.3900e-003	0.0853	0.0717	5.1000e-004	6.4900e-003	6.4900e-003	6.4900e-003	0.0310	0.0310	0.0310	0.0000	92.9036	92.9036	1.7800e-003	1.7000e-003	93.4557	
Quality Restaurant	1.64000e+006	9.8500e-003	0.0905	0.0760	5.4000e-004	6.8800e-003	6.8800e-003	6.8800e-003	0.0310	0.0310	0.0310	0.0000	96.5139	96.5139	1.8900e-003	1.8100e-003	98.0893	
Regional Shopping Center	91840	5.0000e-004	4.5000e-003	3.7800e-003	3.0000e-005	3.4000e-004	3.4000e-004	3.4000e-004	0.0000	0.0000	0.0000	0.0000	4.9009	4.9009	9.0000e-005	9.0000e-005	4.8301	
Total		0.1398	1.2312	0.7770	7.6200e-003	0.0966	0.0966	0.0966	0.0966	0.0966	0.0966	0.0000	1,383.4268	1,383.4268	0.0285	0.0254	1,391.6478	

SWRCC-18
(cont'd)

5.2 Energy by Land Use - NaturalGas Mitigated

Land Use	NaturalGas Use kBTU/yr	tons/yr										MT/yr						
		ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Apartments Low Rise	408494	2.2000e-003	0.0188	8.0100e-003	1.2000e-004	1.5200e-003	1.5200e-003	1.5200e-003	0.0487	0.0487	0.0487	1.5200e-003	0.0000	21.7988	21.7988	4.2000e-004	4.0000e-004	21.9284
Apartments Mid Rise	1.50512e+007	0.0704	0.6018	0.2561	3.6400e-003	0.0487	0.0487	0.0487	0.0487	0.0487	0.0487	0.0000	696.9989	696.9989	0.0134	0.0128	701.1408	
General Office Building	468450	2.5300e-003	0.0230	0.0193	1.4000e-004	1.7500e-003	1.7500e-003	1.7500e-003	0.0310	0.0310	0.0310	0.0000	24.9883	24.9883	4.8000e-004	4.6000e-004	25.1468	
High Turnover (Sit Down Restaurant)	8.30736e+006	0.0448	0.4072	0.3421	2.4400e-003	0.0310	0.0310	0.0310	0.0310	0.0310	0.0310	0.0000	443.3124	443.3124	8.5000e-003	8.1300e-003	445.9468	
Hotel	1.74095e+006	9.3900e-003	0.0853	0.0717	5.1000e-004	6.4900e-003	6.4900e-003	6.4900e-003	0.0310	0.0310	0.0310	0.0000	92.9036	92.9036	1.7800e-003	1.7000e-003	93.4557	
Quality Restaurant	1.64000e+006	9.8500e-003	0.0905	0.0760	5.4000e-004	6.8800e-003	6.8800e-003	6.8800e-003	0.0310	0.0310	0.0310	0.0000	96.5139	96.5139	1.8900e-003	1.8100e-003	98.0893	
Regional Shopping Center	91840	5.0000e-004	4.5000e-003	3.7800e-003	3.0000e-005	3.4000e-004	3.4000e-004	3.4000e-004	0.0000	0.0000	0.0000	0.0000	4.9009	4.9009	9.0000e-005	9.0000e-005	4.8301	
Total		0.1398	1.2312	0.7770	7.6200e-003	0.0966	0.0966	0.0966	0.0966	0.0966	0.0966	0.0000	1,383.4268	1,383.4268	0.0285	0.0254	1,391.6478	

SWRCC-18
(cont'd)

5.3 Energy by Land Use - Electricity
Unmitigated

Land Use	Electricity Use kWh/yr	Total CO2	CH4	N2O	CO2e
Apartment Low Rise	106010	33.7770	1.3900e-003	2.9000e-004	33.8978
Apartment Mid Rise	3.84697e+006	1,257,587.9	0.0519	0.0107	1,262,066.9
General Office Building	584550	186.2502	7.6800e-003	1.5800e-003	186.9165
High Turnover (Sit Down Restaurant)	1.58904e+006	506.3022	0.0209	4.3200e-003	508.1135
Hotel	560308	175.3389	7.2400e-003	1.5000e-003	175.9672
Quality Restaurant	353120	112.5110	4.6500e-003	9.6000e-004	112.9141
Regional Shopping Center	756000	240.8778	9.9400e-003	2.0600e-003	241.7395
Total		2,512,646.5	0.1037	0.0215	2,521,635.6

SWRCC-18
(cont'd)

5.3 Energy by Land Use - Electricity Mitigated

Land Use	Electricity Use kWh/yr	Total CO2	CH4	N2O	CO2e
Apartment Low Rise	106010	33.7770	1.3900e-003	2.9000e-004	33.8978
Apartment Mid Rise	3.84697e+006	1,257,587.9	0.0519	0.0107	1,262,066.9
General Office Building	584550	186.2502	7.6800e-003	1.5900e-003	186.9165
High Turnover (Sit Down Restaurant)	1.58904e+006	506.3022	0.0209	4.3200e-003	508.1135
Hotel	503008	175.3399	7.2400e-003	1.5000e-003	175.9672
Quality Restaurant	353120	112.5110	4.6500e-003	9.6000e-004	112.9141
Regional Shopping Center	756000	240.8778	9.9400e-003	2.0600e-003	241.7395
Total		2,512,646.5	0.1037	0.0215	2,521,635.6

6.0 Area Detail

6.1 Mitigation Measures Area

SWRCC-18
(cont'd)

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

Category	toms/yr											MT/yr				
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Mitigated	5.1437	0.2950	10.3804	1.6700e-003	0.0714	0.0714	0.0714	0.0714	0.0714	0.0714	0.0000	220.9670	220.9670	0.0201	3.7400e-003	222.5635
Unmitigated	5.1437	0.2950	10.3804	1.6700e-003	0.0714	0.0714	0.0714	0.0714	0.0714	0.0714	0.0000	220.9670	220.9670	0.0201	3.7400e-003	222.5635

6.2 Area by SubCategory

Unmitigated

SubCategory	toms/yr											MT/yr				
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Architectural Coating	0.4137				0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	4.3998				0.0000	0.0000			0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0206	0.1763	0.0750	1.1200e-003	0.0143	0.0143	0.0143	0.0143	0.0143	0.0143	0.0000	204.1166	204.1166	3.9100e-003	3.7400e-003	205.3285
Landscaping	0.3096	0.1187	10.3054	5.4000e-004	0.0572	0.0572	0.0572	0.0572	0.0572	0.0572	0.0000	16.8504	16.8504	0.0161	0.0000	17.2540
Total	5.1437	0.2950	10.3804	1.6600e-003	0.0714	0.0714	0.0714	0.0714	0.0714	0.0714	0.0000	220.9670	220.9670	0.0201	3.7400e-003	222.5635

SWRCC-18
(cont'd)

**6.2 Area by SubCategory
 Mitigated**

SubCategory	Tons/yr										MT/yr					
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Architectural Coating	0.4137					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	4.3998					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Health	0.0206	0.1763	0.0750	1.1200e-003		0.0143	0.0143		0.0143	0.0143	0.0000	204.1166	204.1166	3.9100e-003	3.7400e-003	205.3285
Landscaping	0.3096	0.1187	10.3054	5.4000e-004		0.0572	0.0572		0.0572	0.0572	0.0000	16.8504	16.8504	0.0161	0.0000	17.2540
Total	5.1437	0.2950	10.3804	1.6600e-003		0.0714	0.0714		0.0714	0.0714	0.0000	220.9670	220.9670	0.0201	3.7400e-003	222.5835

7.0 Water Detail

7.1 Mitigation Measures Water

SWRCC-18
 (cont'd)

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

SWRCC-18
 (cont'd)

7.2 Water by Land Use
Unmitigated

Land Use	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Mgal	MT/yr	MT/yr	MT/yr	MT/yr	MT/yr
Apartments Low Rise	1,52885 / 1,32886	10,9095	0,0535	1,3400e-003	12,6471
Apartments Mid Rise	63,5252 / 40,0485	425,4719	2,0867	0,0523	493,2363
General Office Building	7,89802 / 4,90201	53,0719	0,2627	6,5900e-003	61,6019
High Turnover (Sit Down Restaurant)	10,9272 / 0,697482	51,2702	0,3580	8,8200e-003	62,8482
Hotel	1,26834 / 0,140927	6,1633	0,0416	1,0300e-003	7,5079
Quality Restaurant	2,42827 / 0,154986	11,3834	0,0780	1,9000e-003	13,9603
Regional Shopping Center	4,14806 / 2,54236	27,5250	0,1363	3,4200e-003	31,9490
Total		585,8052	3,0183	0,0755	683,7567

SWRCC-18
(cont'd)

7.2 Water by Land Use

Mitigated

Land Use	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Mgal	MT/yr	MT/yr	MT/yr	MT/yr	MT/yr
Apartments Low Rise	1,52885 / 1,32886	10,9095	0,0535	1,3400e-003	12,6471
Apartments Mid Rise	63,5252 / 40,0485	425,4719	2,0867	0,0523	493,2363
General Office Building	7,89802 / 4,90201	53,0719	0,2627	6,5900e-003	61,6019
High Turnover (Sit Down Restaurant)	10,9272 / 0,697482	51,2702	0,3580	8,8200e-003	62,8482
Hotel	1,26834 / 0,140927	6,1633	0,0416	1,0300e-003	7,5079
Quality Restaurant	2,42827 / 0,154986	11,3834	0,0780	1,9000e-003	13,9603
Regional Shopping Center	4,14806 / 2,54236	27,5250	0,1363	3,4200e-003	31,9490
Total		585,8052	3,0183	0,0755	683,7567

8.0 Waste Detail

8.1 Mitigation Measures Waste

SWRCC-18
(cont'd)

Category/Year

	MT/yr			
	Total CO2	CH4	N2O	CO2e
Mitigated	207.8075	12.2811	0.0000	514.8354
Unmitigated	207.8075	12.2811	0.0000	514.8354

SWRCC-18
 (cont'd)

8.2 Waste by Land Use
Unmitigated

Land Use	Waste Disposed tons	Total CO2	CH4	N2O	CO2e
		MT/yr			
Apartments Low Rise	11.5	2.3344	0.1380	0.0000	5.7634
Apartments Mid Rise	448.5	91.0415	5.3804	0.0000	225.5513
General Office Building	41.85	8.4952	0.5021	0.0000	21.0464
High Turnover (Sit Down Restaurant)	428.4	86.9613	5.1383	0.0000	215.4430
Hotel	27.38	5.5579	0.3285	0.0000	13.7694
Quality Restaurant	7.3	1.4910	0.0970	0.0000	3.0712
Regional Shopping Center	58.8	11.9359	0.7054	0.0000	29.5706
Total		207.8079	12.2811	0.0000	514.8354

SWRCC-18
 (cont'd)

8.2 Waste by Land Use Mitigated

Land Use	Waste Disposed tons	Total CO2	CH4	N2O	CO2e
Apartment Low Rise	11.5	2.3344	0.1380	0.0000	5.7634
Apartment Mid Rise	448.5	91,0415	5.3804	0.0000	225.5513
General Office Building	41.85	8.4952	0.5021	0.0000	21.0464
High Turnover (Sit Down Restaurant)	428.4	86.9613	5.1393	0.0000	215.4430
Hotel	27.38	5.5579	0.3285	0.0000	13.7694
Quality Restaurant	7.3	1.4610	0.0070	0.0000	3.0712
Regional Shopping Center	58.8	11.9359	0.7054	0.0000	29.5706
Total		207.8079	12.2811	0.0000	514.8354

9.0 Operational Offroad

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

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

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

SWRCC-18
(cont'd)

Boilers

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

User Defined Equipment

Equipment Type	Number
----------------	--------

11.0 Vegetation

SWRCC-18
(cont'd)

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

1.0 Project Characteristics

1.1 Land Usage

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

1.2 Other Project Characteristics

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

1.3 User Entered Comments & Non-Default Data

SWRCC-18
 (cont'd)

Project Characteristics - Consistent with the DEIR's model.
 Land Use - See SWAPE comment regarding residential and retail land uses.
 Construction Phase - See SWAPE comment regarding individual construction phase lengths.
 Demolition - Consistent with the DEIR's model. See SWAPE comment regarding demolition.
 Vehicle Trips - Saturday trips consistent with the DEIR's model. See SWAPE comment regarding weekday and Sunday trips.
 Woodstoves - Woodstoves and wood-burning fireplaces consistent with the DEIR's model. See SWAPE comment regarding gas fireplaces.
 Energy Use -
 Construction Off-road Equipment Mitigation - See SWAPE comment on construction-related mitigation.
 Area Mitigation - See SWAPE comment regarding operational mitigation measures.
 Water Mitigation - See SWAPE comment regarding operational mitigation measures.
 Trips and VMT - Local hire provision

Table Name	Column Name	Default Value	New Value
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	NumberWood	1.25	0.00
tblFireplaces	NumberWood	48.75	0.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblVehicleTrips	ST_TR	7.16	6.17
tblVehicleTrips	ST_TR	6.39	3.87
tblVehicleTrips	ST_TR	2.46	1.39
tblVehicleTrips	ST_TR	158.37	79.82

SWRCC-18
 (cont'd)

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

tbVehicleTrips	ST_TR	8.19	3.75
tbVehicleTrips	ST_TR	94.36	63.99
tbVehicleTrips	ST_TR	49.97	10.74
tbVehicleTrips	SU_TR	6.07	6.16
tbVehicleTrips	SU_TR	5.86	4.18
tbVehicleTrips	SU_TR	1.05	0.69
tbVehicleTrips	SU_TR	131.84	78.27
tbVehicleTrips	SU_TR	5.95	3.20
tbVehicleTrips	SU_TR	72.16	57.65
tbVehicleTrips	SU_TR	25.24	6.39
tbVehicleTrips	WD_TR	5.59	5.83
tbVehicleTrips	WD_TR	6.65	4.13
tbVehicleTrips	WD_TR	11.03	6.41
tbVehicleTrips	WD_TR	127.15	65.60
tbVehicleTrips	WD_TR	8.17	3.84
tbVehicleTrips	WD_TR	89.95	62.64
tbVehicleTrips	WD_TR	42.70	9.43
tbWoodstoves	NumberCatalytic	1.25	0.00
tbWoodstoves	NumberCatalytic	48.75	0.00
tbWoodstoves	NumberNoncatalytic	1.25	0.00
tbWoodstoves	NumberNoncatalytic	48.75	0.00
tbWoodstoves	WoodstoveDayYear	25.00	0.00
tbWoodstoves	WoodstoveDayYear	25.00	0.00
tbWoodstoves	WoodstoveWoodMass	999.60	0.00
tbWoodstoves	WoodstoveWoodMass	999.60	0.00

2.0 Emissions Summary

SWRCC-18
(cont'd)

2.1 Overall Construction (Maximum Daily Emission)
Unmitigated Construction

Year	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
2021	4,2561	46,4415	31,4494	0,0636	18,2032	2,0456	20,2488	9,9670	1,8620	11,8490	0,0000	6,163,416	6	1,9475	0,0000	6,212,103
2022	4,5441	38,8811	40,8776	0,1240	8,8255	1,5381	10,4616	3,6369	1,5052	5,1421	0,0000	12,493,44	03	1,9485	0,0000	12,518,57
2023	4,1534	25,7658	36,7457	0,1206	7,0088	0,7582	7,7679	1,8799	0,7136	2,5935	0,0000	12,150,48	90	0,9588	0,0000	12,174,46
2024	237,0219	9,5478	14,9642	0,0239	1,2171	0,4684	1,2875	0,3229	0,4319	0,4621	0,0000	2,313,180	8	0,7166	0,0000	2,331,095
Maximum	237,0219	46,4415	40,8776	0,1240	18,2032	2,0456	20,2488	9,9670	1,8620	11,8490	0,0000	12,493,44	03	1,9485	0,0000	12,518,57

SWRCC-18
(cont'd)

**2.1 Overall Construction (Maximum Daily Emission)
 Mitigated Construction**

Year	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
2021	4,2561	46,4415	31,4494	0,0636	18,2032	2,0456	20,2488	9,9670	1,8620	11,8490	0,0000	6,163,416 ⁶	1,9475	0,0000	0,0000	6,212,103 ⁹
2022	4,5441	38,8811	40,8776	0,1240	8,8255	1,6381	10,4616	3,6369	1,5052	5,1421	0,0000	12,493,44 ⁰³	1,9485	0,0000	0,0000	12,518,57 ⁰⁷
2023	4,1534	25,7658	36,7457	0,1206	7,0088	0,7582	7,7679	1,8799	0,7136	2,5935	0,0000	12,150,48 ⁹⁰	0,9588	0,0000	0,0000	12,174,46 ¹⁵
2024	237,0219	9,5478	14,9642	0,0239	1,2171	0,4684	1,2875	0,3229	0,4319	0,4621	0,0000	2,313,180 ⁸	0,7166	0,0000	0,0000	2,331,095 ⁵
Maximum	237,0219	46,4415	40,8776	0,1240	18,2032	2,0456	20,2488	9,9670	1,8620	11,8490	0,0000	12,493,44 ⁰³	1,9485	0,0000	0,0000	12,518,57 ⁰⁷
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

SWRCC-18
(cont'd)

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

**2.2 Overall Operational
 Unmitigated Operational**

Category	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Area	30.5020	15.0496	86.4430	0.0944	1.5974	1.5974	1.5974	1.5974	1.5974	1.5974	0.0000	18,148.59	18,148.59	0.4874	0.3300	18,259.11
Energy	0.7660	6.7462	4.2573	0.0418	0.5292	0.5292	0.5292	0.5292	0.5292	0.5292	0.0000	8,355.983	8,355.983	0.1602	0.1532	8,405.638
Mobile	9.8489	45.4304	114.8495	0.4917	45.9592	0.3360	46.2951	12.2950	0.3119	12.6070	0.0000	50,306.60	50,306.60	2.1807	0.08	50,361.12
Total	41.1168	67.2262	207.5497	0.6278	45.9592	2.4626	48.4217	12.2950	2.4385	14.7336	0.0000	76,811.18	76,811.18	2.8282	0.4832	77,025.87

Mitigated Operational

Category	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Area	30.5020	15.0496	86.4430	0.0944	1.5974	1.5974	1.5974	1.5974	1.5974	1.5974	0.0000	18,148.59	18,148.59	0.4874	0.3300	18,259.11
Energy	0.7660	6.7462	4.2573	0.0418	0.5292	0.5292	0.5292	0.5292	0.5292	0.5292	0.0000	8,355.983	8,355.983	0.1602	0.1532	8,405.638
Mobile	9.8489	45.4304	114.8495	0.4917	45.9592	0.3360	46.2951	12.2950	0.3119	12.6070	0.0000	50,306.60	50,306.60	2.1807	0.08	50,361.12
Total	41.1168	67.2262	207.5497	0.6278	45.9592	2.4626	48.4217	12.2950	2.4385	14.7336	0.0000	76,811.18	76,811.18	2.8282	0.4832	77,025.87

SWRCC-18
 (cont'd)

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

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

3.0 Construction Detail

Construction Phase

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

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 112.5

Acres of Paving: 0

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

OffRoad Equipment

SWRCC-18
(cont'd)

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

Trips and VMT

SWRCC-18
 (cont'd)

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

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	6	15.00	0.00	458.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	7	18.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	801.00	143.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	160.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Demolition - 2021

Unmitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Fugitive Dust					3.3074	0.0000	3.3074	0.5008	0.0000	0.5008			0.0000			0.0000
Off-Road	3.1651	31.4407	21.5650	0.0388	1.5513	1.5513	1.5513	1.4411	1.4411	1.4411		3,747,944.9	3,747,944.9	1.0549		3,774,317.4
Total	3.1651	31.4407	21.5650	0.0388	3.3074	1.5513	4.8588	0.5008	1.4411	1.9419		3,747,944.9	3,747,944.9	1.0549		3,774,317.4

SWRCC-18
(cont'd)

3.2 Demolition - 2021
Unmitigated Construction Off-Site

Category	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.1273	4.0952	0.9602	0.0119	0.2669	0.0126	0.2795	0.0732	0.0120	0.0852		1,292,241 ³	1,292,241 ³	0.0877		1,294,433 ⁷
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0487	0.0313	0.4282	1.1800e-003	0.1141	9.5000e-004	0.1151	0.0303	8.8000e-004	0.0311		117,2799	117,2799	3.5200e-003		117,3678
Total	0.1760	4.1265	1.3884	0.0131	0.3810	0.0135	0.3946	0.1034	0.0129	0.1163		1,409,521²	1,409,521²	0.0912		1,411,801⁵

Mitigated Construction On-Site

Category	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Fugitive Dust					3.3074	0.0000	3.3074	0.5008	0.0000	0.5008			0.0000			0.0000
Off-Road	3.1651	31.4407	21.5650	0.0388	1.5513	1.5513	1.5513	1.4411	1.4411	1.4411	0.0000	3,747,944 ⁹	3,747,944 ⁹	1.0549		3,774,317 ⁴
Total	3.1651	31,4407	21,5650	0.0388	3,3074	1,5513	4,8588	0,5008	1,4411	1,9419	0,0000	3,747,944⁹	3,747,944⁹	1,0549		3,774,317⁴

SWRCC-18
(cont'd)

3.2 Demolition - 2021

Mitigated Construction Off-Site

Category	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.1273	4.0952	0.9602	0.0119	0.2669	0.0126	0.2795	0.0732	0.0120	0.0852		1,292.241 ₃	1,292.241 ₃	0.0877		1,294.433 ₇
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0487	0.0313	0.4282	1.1800e-003	0.1141	9.5000e-004	0.1151	0.0303	8.8000e-004	0.0311		117.2799	117.2799	3.5200e-003		117.3678
Total	0.1760	4.1265	1.3884	0.0131	0.3810	0.0135	0.3946	0.1034	0.0129	0.1163		1,409.521₂	1,409.521₂	0.0912		1,411.801₅

3.3 Site Preparation - 2021

Unmitigated Construction On-Site

Category	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307			0.0000			0.0000
Off-Road	3.8852	40.4971	21.1543	0.0380	2.0445	2.0445	2.0445	1.8809	1.8809	1.8809		3,685.656 ₉	3,685.656 ₉	1.1920		3,715.457 ₃
Total	3.8852	40.4971	21.1543	0.0380	18.0663	2.0445	20.1107	9.9307	1.8809	11.8116		3,685.656₉	3,685.656₉	1.1920		3,715.457₃

SWRCC-18
(cont'd)

**3.3 Site Preparation - 2021
 Unmitigated Construction Off-Site**

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0584	0.0375	0.5139	1.4100e-003	0.1369	1.1400e-003	0.1381	0.0363	1.0500e-003	0.0374	140.7359	140.7359	4.2200e-003	140.7359	4.2200e-003	140.8414	140.8414
Total	0.0584	0.0375	0.5139	1.4100e-003	0.1369	1.1400e-003	0.1381	0.0363	1.0500e-003	0.0374	140.7359	140.7359	4.2200e-003	140.7359	4.2200e-003	140.8414	140.8414

Mitigated Construction On-Site

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	3.8862	40.4971	21.1543	0.0380	2.0445	2.0445	2.0445	1.8809	1.8809	1.8809	0.0000	3.685.6569	3.685.6569	1.1920	3.715.4573	3.715.4573	3.715.4573
Total	3.8862	40.4971	21.1543	0.0380	18.0663	2.0445	20.1107	9.9307	1.8809	11.8116	0.0000	3.685.6569	3.685.6569	1.1920	3.715.4573	3.715.4573	3.715.4573

SWRCC-18
(cont'd)

3.3 Site Preparation - 2021

Mitigated Construction Off-Site

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0584	0.0375	0.5139	1.4100e-003	0.1369	1.1400e-003	0.1381	0.0363	1.0500e-003	0.0374	140.7359	140.7359	4.2200e-003	0.0000	0.0000	140.8414	140.8414
Total	0.0584	0.0375	0.5139	1.4100e-003	0.1369	1.1400e-003	0.1381	0.0363	1.0500e-003	0.0374	140.7359	140.7359	4.2200e-003	0.0000	0.0000	140.8414	140.8414

3.4 Grading - 2021

Unmitigated Construction On-Site

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Fugitive Dust	0.0000	0.0000	0.0000	0.0000	8.6733	0.0000	8.6733	3.5965	0.0000	3.5965	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	4.1912	46.3998	30.8785	0.0620	1.9853	1.9853	1.9853	1.8265	1.8265	1.8265	6.007.043	6.007.043	1.9428	1.9428	0.0000	6.055.613	6.055.613
Total	4.1912	46.3998	30.8785	0.0620	8.6733	1.9853	10.6587	3.5965	1.8265	5.4230	6.007.043	6.007.043	1.9428	1.9428	0.0000	6.055.613	6.055.613

SWRCC-18
(cont'd)

3.4 Grading - 2021
Unmitigated Construction Off-Site

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0649	0.0417	0.5710	1.5700e-003	0.1521	1.2700e-003	0.1534	0.0404	1.1700e-003	0.0415	156.3732	156.3732	4.6900e-003	156.3732	4.6900e-003	156.4904	156.4904
Total	0.0649	0.0417	0.5710	1.5700e-003	0.1521	1.2700e-003	0.1534	0.0404	1.1700e-003	0.0415	156.3732	156.3732	4.6900e-003	156.3732	4.6900e-003	156.4904	156.4904

Mitigated Construction On-Site

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	4.1912	46.3998	30.8785	0.0620	1.9853	1.9853	1.9853	1.8265	1.8265	1.8265	0.0000	6.007.043	6.007.043	1.9428	6.055.613	6.055.613	6.055.613
Total	4.1912	46.3998	30.8785	0.0620	8.6733	1.9853	10.6587	3.5965	1.8265	5.4230	0.0000	6.007.043	6.007.043	1.9428	6.055.613	6.055.613	6.055.613

SWRCC-18
(cont'd)

3.4 Grading - 2021

Mitigated Construction Off-Site

Category	lb/day											CO2e				
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2		NBio- CO2	Total CO2	CH4	N2O
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0648	0.0417	0.5710	1.5700e-003	0.1521	1.2700e-003	0.1534	0.0404	1.1700e-003	0.0415	156.3732	156.3732	4.6900e-003	156.4904		156.4904
Total	0.0648	0.0417	0.5710	1.5700e-003	0.1521	1.2700e-003	0.1534	0.0404	1.1700e-003	0.0415	156.3732	156.3732	4.6900e-003	156.4904		156.4904

3.4 Grading - 2022

Unmitigated Construction On-Site

Category	lb/day											CO2e				
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2		NBio- CO2	Total CO2	CH4	N2O
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	3.6248	38.8435	29.0415	0.0621		1.6349	1.6349	1.5041	1.5041	1.5041	6.011.4105	6.011.4105	1.9442	1.9442		6.060.0158
Total	3.6248	38.8435	29.0415	0.0621	8.6733	1.6349	10.3082	3.5965	1.5041	5.1006	6.011.4105	6.011.4105	1.9442	1.9442		6.060.0158

SWRCC-18
(cont'd)

3.4 Grading - 2022
Unmitigated Construction Off-Site

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0607	0.0376	0.5263	1.5100e-003	0.1521	1.2300e-003	0.1534	0.0404	1.1300e-003	0.0415	150.8754	150.8754	4.2400e-003	150.8754	150.8754	150.8754	150.8754
Total	0.0607	0.0376	0.5263	1.5100e-003	0.1521	1.2300e-003	0.1534	0.0404	1.1300e-003	0.0415	150.8754	150.8754	4.2400e-003	150.8754	150.8754	150.8754	150.8754

Mitigated Construction On-Site

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000	
Off-Road	3.6248	38.8435	29.0415	0.0621		1.6349	1.6349	1.5041	1.5041	1.5041	0.0000	6.011.4105	6.011.4105	1.9442		6.060.0158	
Total	3.6248	38.8435	29.0415	0.0621	8.6733	1.6349	10.3082	3.5965	1.5041	5.1006	0.0000	6.011.4105	6.011.4105	1.9442		6.060.0158	

SWRCC-18
(cont'd)

3.4 Grading - 2022

Mitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0607	0.0376	0.5263	1.5100e-003	0.1521	1.2300e-003	0.1534	0.0404	1.1300e-003	0.0415	150.8754	150.8754	4.2400e-003	150.8754	4.2400e-003	150.9813
Total	0.0607	0.0376	0.5263	1.5100e-003	0.1521	1.2300e-003	0.1534	0.0404	1.1300e-003	0.0415	150.8754	150.8754	4.2400e-003	150.8754	4.2400e-003	150.9813

3.5 Building Construction - 2022

Unmitigated Construction On-Site

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

SWRCC-18
(cont'd)

**3.5 Building Construction - 2022
 Unmitigated Construction Off-Site**

Category	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.4079	13.2032	3.4341	0.0364	0.9155	0.0248	0.9404	0.2636	0.0237	0.2873	3,896.548 2	3,896.548 2	0.2236	0.2236		3,902.138 4
Worker	2.4289	1.5074	21.0801	0.0607	6.0932	0.0493	6.1425	1.6163	0.0454	1.6617	6,042.558 5	6,042.558 5	0.1697	0.1697		6,046.800 0
Total	2.8378	14.7106	24.5142	0.0971	7.0087	0.0741	7.0828	1.8799	0.0691	1.9490	9,939.106 7	9,939.106 7	0.3933	0.3933		9,946.938 4

Mitigated Construction On-Site

Category	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Off-Road	1.7062	15.6156	16.3634	0.0269		0.8090	0.8090		0.7612	0.7612	0.0000	2,554.333 6	2,554.333 6	0.6120		2,569.632 2
Total	1.7062	15.6156	16.3634	0.0269		0.8090	0.8090		0.7612	0.7612	0.0000	2,554.333 6	2,554.333 6	0.6120		2,569.632 2

SWRCC-18
(cont'd)

3.5 Building Construction - 2022
Mitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000
Vendor	0.4079	13.2032	3.4341	0.0364	0.9155	0.0248	0.9404	0.2636	0.0237	0.2873	3,896,548	2	3,896,548	0.2236		3,902,136
Worker	2.4239	1.5074	21.0801	0.0607	6.0932	0.0493	6.1425	1.6163	0.0454	1.6617	6,042,558	5	6,042,558	0.1697		6,046,800
Total	2.8378	14.7106	24.5142	0.0971	7.0087	0.0741	7.0828	1.8799	0.0691	1.9490	9,939,106	7	9,939,106	0.3933		9,946,938

3.5 Building Construction - 2023
Unmitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Off-Road	1.5728	14.3849	16.2440	0.0269		0.6997	0.6997		0.6584	0.6584	2,555,209	9	2,555,209	0.6079		2,570,406
Total	1.5728	14.3849	16.2440	0.0269		0.6997	0.6997		0.6584	0.6584	2,555,209	9	2,555,209	0.6079		2,570,406

SWRCC-18
(cont'd)

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

3.5 Building Construction - 2023
Unmitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.3027	10.0181	3.1014	0.0352	0.9156	0.0116	0.9271	0.2636	0.0111	0.2747	3,773.8762	3,773.8762	0.1982			3,776.8300
Worker	2.2780	1.3528	19.4002	0.0584	6.0932	0.0479	6.1411	1.6163	0.0441	1.6604	5,821.4028	5,821.4028	0.1528			5,825.2254
Total	2.5807	11.3809	22.5017	0.0936	7.0088	0.0595	7.0682	1.8799	0.0552	1.9350	9,595.2790	9,595.2790	0.3511			9,604.0554

Mitigated Construction On-Site

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

SWRCC-18
(cont'd)

3.5 Building Construction - 2023
Mitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.3027	10.0181	3.1014	0.0352	0.9156	0.0116	0.9271	0.2636	0.0111	0.2747	3,773.8762	3,773.8762	0.1982	0.0000	0.0000	3,776.8300
Worker	2.2780	1.3528	19.4002	0.0584	6.0932	0.0479	6.1411	1.6163	0.0441	1.6604	5,821.4028	5,821.4028	0.1528	0.0000	0.0000	5,825.2254
Total	2.5807	11.3809	22.5017	0.0936	7.0088	0.0595	7.0682	1.8799	0.0552	1.9350	9,595.2790	9,595.2790	0.3511	0.0000	0.0000	9,604.0654

3.6 Paving - 2023
Unmitigated Construction On-Site

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

SWRCC-18
(cont'd)

3.6 Paving - 2023

Unmitigated Construction Off-Site

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0427	0.0255	0.3633	1.0900e-003	0.1141	9.0000e-004	0.1150	0.0303	8.3000e-004	0.0311	109.0150	109.0150	2.8600e-003	0.0000	0.0000	109.0866	109.0866
Total	0.0427	0.0255	0.3633	1.0900e-003	0.1141	9.0000e-004	0.1150	0.0303	8.3000e-004	0.0311	109.0150	109.0150	2.8600e-003	0.0000	0.0000	109.0866	109.0866

Mitigated Construction On-Site

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Off-Road	1.0327	10.1917	14.5642	0.0228	0.5102	0.5102	0.5102	0.4694	0.4694	0.4694	0.0000	2.207.584 ₁	2.207.584 ₁	0.7140	0.0000	2.225.433 ₆	2.225.433 ₆
Paving	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	1.0327	10.1917	14.5642	0.0228	0.5102	0.5102	0.5102	0.4694	0.4694	0.4694	0.0000	2.207.584₁	2.207.584₁	0.7140	0.0000	2.225.433₆	2.225.433₆

SWRCC-18
(cont'd)

3.6 Paving - 2023

Mitigated Construction Off-Site

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0427	0.0255	0.3633	1.0900e-003	0.1141	9.0000e-004	0.1150	0.0303	8.3000e-004	0.0311	109.0150	109.0150	2.8600e-003	109.0150	2.8600e-003	109.0866	109.0866
Total	0.0427	0.0255	0.3633	1.0900e-003	0.1141	9.0000e-004	0.1150	0.0303	8.3000e-004	0.0311	109.0150	109.0150	2.8600e-003	109.0150	2.8600e-003	109.0866	109.0866

3.6 Paving - 2024

Unmitigated Construction On-Site

Category	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Off-Road	0.9882	9.5246	14.6258	0.0228	0.4685	0.4685	0.4310	0.4310	0.4310	0.4310	2.207.547 ₂	2.207.547 ₂	0.7140	0.7140	2.225.396 ₃	2.225.396 ₃
Paving	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.9882	9.5246	14.6258	0.0228	0.4685	0.4685	0.4310	0.4310	0.4310	0.4310	2.207.547₂	2.207.547₂	0.7140	0.7140	2.225.396₃	2.225.396₃

SWRCC-18
(cont'd)

3.6 Paving - 2024

Unmitigated Construction Off-Site

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0403	0.0233	0.3384	1.0600e-003	0.1141	8.8000e-004	0.1150	0.0303	8.1000e-004	0.0311	105.6336	105.6336	2.6300e-003	105.6992		105.6992	
Total	0.0403	0.0233	0.3384	1.0600e-003	0.1141	8.8000e-004	0.1150	0.0303	8.1000e-004	0.0311	105.6336	105.6336	2.6300e-003	105.6992		105.6992	

Mitigated Construction On-Site

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Off-Road	0.9882	9.5246	14.6258	0.0228		0.4685	0.4685		0.4310	0.4310	0.0000	2,207.547 ²	0.7140			2,225.396 ³	
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000	
Total	0.9882	9.5246	14.6258	0.0228		0.4685	0.4685		0.4310	0.4310	0.0000	2,207.547²	0.7140			2,225.396³	

SWRCC-18
(cont'd)

3.6 Paving - 2024

Mitigated Construction Off-Site

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0403	0.0233	0.3384	1.0600e-003	0.1141	8.8000e-004	0.1150	0.0303	8.1000e-004	0.0311	105.6336	105.6336	2.6300e-003	105.6992		105.6992	
Total	0.0403	0.0233	0.3384	1.0600e-003	0.1141	8.8000e-004	0.1150	0.0303	8.1000e-004	0.0311	105.6336	105.6336	2.6300e-003	105.6992		105.6992	

3.7 Architectural Coating - 2024

Unmitigated Construction On-Site

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Archit. Coating	236.4115					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000	
Off-Road	0.1808	1.2188	1.8101	2.9700e-003		0.0609	0.0609		0.0609	0.0609	281.4481	281.4481	0.0159	0.0159		281.8443	
Total	236.5923	1.2188	1.8101	2.9700e-003		0.0609	0.0609		0.0609	0.0609	281.4481	281.4481	0.0159	0.0159		281.8443	

SWRCC-18
(cont'd)

**3.7 Architectural Coating - 2024
 Unmitigated Construction Off-Site**

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.4256	0.2481	3.6088	0.0113	1.2171	9.4300e-003	1.2266	0.3223	8.6800e-003	0.3315	1,126,758	1,126,758	0.0280	0.0280	0.0280	1,127,458	3
Total	0.4256	0.2481	3.6088	0.0113	1.2171	9.4300e-003	1.2266	0.3223	8.6800e-003	0.3315	1,126,758	1,126,758	0.0280	0.0280	0.0280	1,127,458	3

Mitigated Construction On-Site

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Archit. Coating	236.4115					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	
Off-Road	0.1808	1.2188	1.8101	2.9700e-003		0.0609	0.0609		0.0609	0.0609	0.0000	281,4481	281,4481	0.0159	0.0159	281,8443	
Total	236.5923	1.2188	1.8101	2.9700e-003		0.0609	0.0609		0.0609	0.0609	0.0000	281,4481	281,4481	0.0159	0.0159	281,8443	

SWRCC-18
(cont'd)

**3.7 Architectural Coating - 2024
 Mitigated Construction Off-Site**

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.4256	0.2481	3.6088	0.0113	1.2171	9.4300e-003	1.2266	0.3223	8.6800e-003	0.3315	1,126.758	3	1,126.758	0.0280	3	1,127.458	3
Total	0.4256	0.2481	3.6088	0.0113	1.2171	9.4300e-003	1.2266	0.3223	8.6800e-003	0.3315	1,126.758	3	1,126.758	0.0280	3	1,127.458	3

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

SWRCC-18
 (cont'd)

Category	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Mitigated	9.8489	45.4304	114.8495	0.4917	45.9592	0.3380	46.2951	12.2950	0.3119	12.6070		50,306.60	50,306.60	2.1807		50,361.12
Unmitigated	9.8489	45.4304	114.8495	0.4917	45.9592	0.3380	46.2951	12.2950	0.3119	12.6070		50,306.60	50,306.60	2.1807		50,361.12

4.2 Trip Summary Information

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

4.3 Trip Type Information

SWRCC-18
(cont'd)

Land Use	Miles						Trip %						Trip Purpose %			
	H-W or C-W	H-S or C-C	H-O or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-C	H-O or C-NW	Primary	Diverted	Pass-by	
Apartments Low Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3							
Apartments Mid Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3							
General Office Building	16.60	8.40	6.90	33.00	48.00	19.00	77	19	4							
High Turnover (Sit Down Hotel)	16.60	8.40	6.90	8.50	72.50	19.00	37	20	43							
Quality Restaurant	16.60	8.40	6.90	19.40	61.60	19.00	58	38	4							
Regional Shopping Center	16.60	8.40	6.90	12.00	66.00	19.00	38	18	44							
	16.60	8.40	6.90	16.30	64.70	19.00	54	35	11							

4.4 Fleet Mix

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

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

SWRCC-18
(cont'd)

Category	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Natural Gas Mitigated	0.7660	6.7462	4.2573	0.0418	0.5292	0.5292	0.5292	0.5292	0.5292	0.5292	0.355.983	0.355.983	18.355.983	0.1602	0.1532	8.405.638
Natural Gas Unmitigated	0.7660	6.7462	4.2573	0.0418	0.5292	0.5292	0.5292	0.5292	0.5292	0.5292	0.355.983	0.355.983	18.355.983	0.1602	0.1532	8.405.638

SWRCC-18
(cont'd)

**5.2 Energy by Land Use - NaturalGas
 Unmitigated**

Land Use	NaturalGas Use kBTU/yr	lb/day										CO2e					
		ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total		Bio- CO2	NBio- CO2	Total CO2	CH4	N2O
Apartments Low Rise	1119.16	0.0121	0.1031	0.0439	6.6000e-004	8.3400e-003	8.3400e-003	8.3400e-003	8.3400e-003	8.3400e-003	8.3400e-003	131.6662	131.6662	131.6662	2.5200e-003	2.4100e-003	132.4466
Apartments Mid Rise	35764.3	0.3659	3.2976	1.4033	0.0211	0.2666	0.2666	0.2666	0.2666	0.2666	0.2666	4,209,916	4,209,916	4,209,916	0.0807	0.0772	4,234,933
General Office Building	1283.42	0.0138	0.1258	0.1057	7.5000e-004	9.5600e-003	9.5600e-003	9.5600e-003	9.5600e-003	9.5600e-003	9.5600e-003	150.9911	150.9911	150.9911	2.8900e-003	2.7700e-003	151.8684
High Turnover (Sit Down Restaurant)	22759.9	0.2455	2.2314	1.8743	0.0194	0.1696	0.1696	0.1696	0.1696	0.1696	0.1696	2,677,634	2,677,634	2,677,634	0.0513	0.0491	2,693,546
Hotel	4769.72	0.0514	0.4676	0.3928	2.8100e-003	0.0355	0.0355	0.0355	0.0355	0.0355	0.0355	561.1436	561.1436	561.1436	0.0108	0.0103	564.4782
Quality Restaurant	5057.75	0.0545	0.4959	0.4165	2.8000e-003	0.0377	0.0377	0.0377	0.0377	0.0377	0.0377	595.0290	595.0290	595.0290	0.0114	0.0109	596.5658
Regional Shopping Center	251,616	2.7100e-003	0.0247	0.0207	1.5000e-004	1.8700e-003	1.8700e-003	1.8700e-003	1.8700e-003	1.8700e-003	1.8700e-003	29,6019	29,6019	29,6019	5.7000e-004	5.4000e-004	29,7778
Total		0.7660	6.7463	4.2573	0.0418	0.5292	0.5292	0.5292	0.5292	0.5292	0.5292	8,355,983	8,355,983	8,355,983	0.1602	0.1532	8,405,638

SWRCC-18
 (cont'd)

5.2 Energy by Land Use - NaturalGas Mitigated

Land Use	NaturalGas Use kBTU/yr	lb/day										lb/day						
		ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Apartments Low Rise	1.11916	0.0121	0.1031	0.0439	6.6000e-004	8.3400e-003	8.3400e-003	8.3400e-003	8.3400e-003	8.3400e-003	8.3400e-003	131.6662	131.6662	131.6662	2.5200e-003	2.4100e-003	2.4100e-003	132.4486
Apartments Mid Rise	33.7843	0.3859	3.2978	1.4033	0.0211	0.2666	0.2666	0.2666	0.2666	0.2666	0.2666	4,209,916	4,209,916	4,209,916	0.0807	0.0772	0.0772	4,234,933
General Office Building	1.26342	0.0138	0.1258	0.1057	7.5000e-004	9.5600e-003	9.5600e-003	9.5600e-003	9.5600e-003	9.5600e-003	9.5600e-003	150.9911	150.9911	150.9911	2.8900e-003	2.7700e-003	2.7700e-003	151.8884
High Turnover (Sit Down Restaurant)	22.7599	0.2455	2.2314	1.8743	0.0194	0.1696	0.1696	0.1696	0.1696	0.1696	0.1696	2,677,634	2,677,634	2,677,634	0.0513	0.0491	0.0491	2,693,546
Hotel	4.76972	0.0514	0.4676	0.3928	2.8100e-003	0.0355	0.0355	0.0355	0.0355	0.0355	0.0355	561.1436	561.1436	561.1436	0.0108	0.0103	0.0103	564.4782
Quality Restaurant	5.05775	0.0545	0.4959	0.4165	2.8000e-003	0.0377	0.0377	0.0377	0.0377	0.0377	0.0377	595.0290	595.0290	595.0290	0.0114	0.0109	0.0109	596.5658
Regional Shopping Center	0.251616	2.7100e-003	0.0247	0.0207	1.5000e-004	1.8700e-003	1.8700e-003	1.8700e-003	1.8700e-003	1.8700e-003	1.8700e-003	29.6019	29.6019	29.6019	5.7000e-004	5.4000e-004	5.4000e-004	29.7778
Total		0.7660	6.7463	4.2573	0.0418	0.5292	0.5292	0.5292	0.5292	0.5292	0.5292	8,355,983	8,355,983	8,355,983	0.1602	0.1532	0.1532	8,405,638

6.0 Area Detail

6.1 Mitigation Measures Area

SWRCC-18
(cont'd)

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

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Mitigated	30.5020	15.0496	88.4430	0.0944	1.5974	1.5974	1.5974	1.5974	1.5974	1.5974	0.0000	18,148.59	18,148.59	0.4874	0.3300	18,259.11
Unmitigated	30.5020	15.0496	88.4430	0.0944	1.5974	1.5974	1.5974	1.5974	1.5974	1.5974	0.0000	18,148.59	18,148.59	0.4874	0.3300	18,259.11

6.2 Area by SubCategory

Unmitigated

SubCategory	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Architectural Coating	2.2670				0.0000	0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	24.1065				0.0000	0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Heath	1.6500	14.1000	6.0000	0.0900	1.1400	1.1400	1.1400	1.1400	1.1400	1.1400	0.0000	18,000.00	18,000.00	0.3450	0.3300	18,106.96
Landscaping	2.4766	0.9496	82.4430	4.3600e-003	0.4574	0.4574	0.4574	0.4574	0.4574	0.4574	148.5950	148.5950	0.1424			152.1542
Total	30.5020	15.0496	88.4430	0.0944	1.5974	1.5974	1.5974	1.5974	1.5974	1.5974	0.0000	18,148.59	18,148.59	0.4874	0.3300	18,259.11

SWRCC-18
(cont'd)

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

6.2 Area by SubCategory
Mitigated

SubCategory	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Architectural Coating	2.2670				0.0000	0.0000	0.0000	0.0000	0.0000	0.0000			0.0000			0.0000
Consumer Products	24.1085				0.0000	0.0000	0.0000	0.0000	0.0000	0.0000			0.0000			0.0000
Hearth	1.6500	14.1000	6.0000	0.0900	1.1400	1.1400	1.1400	1.1400	1.1400	1.1400	0.0000	18,000.00	18,000.00	0.3450	0.3300	18,106.96
Landscaping	2.4786	0.9496	82.4430	4.3600e-003	0.4574	0.4574	0.4574	0.4574	0.4574	0.4574	148.5950	148.5950	0.1424			152.1542
Total	30.5020	15.0496	88.4430	0.0944	1.5974	1.5974	1.5974	1.5974	1.5974	1.5974	0.0000	18,148.59	18,148.59	0.4874	0.3300	18,259.11

7.0 Water Detail

7.1 Mitigation Measures Water

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

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

10.0 Stationary Equipment

SWRCC-18
 (cont'd)

Fire Pumps and Emergency Generators

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

Boilers

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

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

SWRCC-18
 (cont'd)

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

1.0 Project Characteristics

1.1 Land Usage

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

1.2 Other Project Characteristics

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

1.3 User Entered Comments & Non-Default Data

SWRCC-18
(cont'd)

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

- Project Characteristics - Consistent with the DEIR's model.
- Land Use - See SWAPE comment regarding residential and retail land uses.
- Construction Phase - See SWAPE comment regarding individual construction phase lengths.
- Demolition - Consistent with the DEIR's model. See SWAPE comment regarding demolition.
- Vehicle Trips - Saturday trips consistent with the DEIR's model. See SWAPE comment regarding weekday and Sunday trips.
- Woodstoves - Woodstoves and wood-burning fireplaces consistent with the DEIR's model. See SWAPE comment regarding gas fireplaces.
- Energy Use -
- Construction Off-road Equipment Mitigation - See SWAPE comment on construction-related mitigation.
- Area Mitigation - See SWAPE comment regarding operational mitigation measures.
- Water Mitigation - See SWAPE comment regarding operational mitigation measures.
- Trips and VMT - Local hire provision

Table Name	Column Name	Default Value	New Value
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	NumberWood	1.25	0.00
tblFireplaces	NumberWood	48.75	0.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblVehicleTrips	ST_TR	7.16	6.17
tblVehicleTrips	ST_TR	6.39	3.87
tblVehicleTrips	ST_TR	2.46	1.39
tblVehicleTrips	ST_TR	158.37	79.82

SWRCC-18
(cont'd)

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

tbVehicleTrips	ST_TR	8.19	3.75
tbVehicleTrips	ST_TR	94.36	63.99
tbVehicleTrips	ST_TR	49.97	10.74
tbVehicleTrips	SU_TR	6.07	6.16
tbVehicleTrips	SU_TR	5.86	4.18
tbVehicleTrips	SU_TR	1.05	0.69
tbVehicleTrips	SU_TR	131.84	78.27
tbVehicleTrips	SU_TR	5.95	3.20
tbVehicleTrips	SU_TR	72.16	57.65
tbVehicleTrips	SU_TR	25.24	6.39
tbVehicleTrips	WD_TR	5.59	5.83
tbVehicleTrips	WD_TR	6.65	4.13
tbVehicleTrips	WD_TR	11.03	6.41
tbVehicleTrips	WD_TR	127.15	65.80
tbVehicleTrips	WD_TR	8.17	3.84
tbVehicleTrips	WD_TR	89.95	62.64
tbVehicleTrips	WD_TR	42.70	9.43
tbWoodstoves	NumberCatalytic	1.25	0.00
tbWoodstoves	NumberCatalytic	48.75	0.00
tbWoodstoves	NumberNoncatalytic	1.25	0.00
tbWoodstoves	NumberNoncatalytic	48.75	0.00
tbWoodstoves	WoodstoveDayYear	25.00	0.00
tbWoodstoves	WoodstoveDayYear	25.00	0.00
tbWoodstoves	WoodstoveWoodMass	999.60	0.00
tbWoodstoves	WoodstoveWoodMass	999.60	0.00

2.0 Emissions Summary

SWRCC-18
(cont'd)

**2.1 Overall Construction (Maximum Daily Emission)
 Unmitigated Construction**

Year	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
2021	4,2621	46,4460	31,4068	0.0635	18,2032	2,0456	20,2488	9,9670	1,8620	11,8490	0.0000	6,154,337 ⁷	6,154,337 ⁷	1,9472	0.0000	6,203,018 ⁶
2022	4,7966	38,8651	39,6338	0.1195	8,8255	1,5381	10,4616	3,6369	1,5052	5,1421	0.0000	12,035.34 ⁴⁰	12,035.34 ⁴⁰	1,9482	0.0000	12,060.60 ¹³
2023	4,3939	25,8648	37,5031	0.1162	7,0088	0,7598	7,7685	1,8799	0,7142	2,5940	0.0000	11,710.40 ⁸⁰	11,710.40 ⁸⁰	0,9617	0.0000	11,734.44 ⁹⁷
2024	237,0656	9,5503	14,9372	0.0238	1,2171	0,4684	1,2875	0,3229	0,4319	0,4621	0.0000	2,307,051 ⁷	2,307,051 ⁷	0,7164	0.0000	2,324,862 ⁷
Maximum	237,0656	46,4460	39,6338	0.1195	18,2032	2,0456	20,2488	9,9670	1,8620	11,8490	0.0000	12,035.34 ⁴⁰	12,035.34 ⁴⁰	1,9482	0.0000	12,060.60 ¹³

SWRCC-18
(cont'd)

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

2.1 Overall Construction (Maximum Daily Emission)
Mitigated Construction

Year	lb/day											lb/day				
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
2021	4,2621	46,4460	31,4068	0,0635	18,2032	2,0456	20,2488	9,9670	1,8620	11,8490	0,0000	6,154,337	7	1,9472	0,0000	6,203,018
2022	4,7966	38,8851	39,6338	0,1195	8,8255	1,6381	10,4616	3,6369	1,5052	5,1421	0,0000	12,035,34	40	1,9482	0,0000	12,060,60
2023	4,3939	25,8648	37,5031	0,1162	7,0088	0,7598	7,7685	1,8799	0,7142	2,5940	0,0000	11,710,40	80	0,9617	0,0000	11,734,44
2024	237,0656	9,5503	14,9372	0,0238	1,2171	0,4684	1,2875	0,3229	0,4319	0,4621	0,0000	2,307,051	7	0,7164	0,0000	2,324,862
Maximum	237,0656	46,4460	39,6338	0,1195	18,2032	2,0456	20,2488	9,9670	1,8620	11,8490	0,0000	12,035,34	40	1,9482	0,0000	12,060,60
Percent Reduction	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00

SWRCC-18
(cont'd)

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

**2.2 Overall Operational
 Unmitigated Operational**

Category	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Area	30.5020	15.0496	86.4430	0.0944	1.5974	1.5974	1.5974	1.5974	1.5974	1.5974	0.0000	18,148.59	18,148.59	0.4874	0.3300	18,259.11
Energy	0.7660	6.7462	4.2573	0.0418	0.5292	0.5292	0.5292	0.5292	0.5292	0.5292	0.0000	8,355.983	8,355.983	0.1602	0.1532	8,405.638
Mobile	9.5233	45.9914	110.0422	0.4681	45.9592	0.3373	46.2965	12.2950	0.3132	12.6083	0.0000	47,917.80	47,917.80	2.1953	0.4832	47,972.66
Total	40.7912	67.7872	202.7424	0.6043	45.9592	2.4640	48.4231	12.2950	2.4389	14.7349	0.0000	74,422.37	74,422.37	2.8429	0.4832	74,637.44

Mitigated Operational

Category	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Area	30.5020	15.0496	86.4430	0.0944	1.5974	1.5974	1.5974	1.5974	1.5974	1.5974	0.0000	18,148.59	18,148.59	0.4874	0.3300	18,259.11
Energy	0.7660	6.7462	4.2573	0.0418	0.5292	0.5292	0.5292	0.5292	0.5292	0.5292	0.0000	8,355.983	8,355.983	0.1602	0.1532	8,405.638
Mobile	9.5233	45.9914	110.0422	0.4681	45.9592	0.3373	46.2965	12.2950	0.3132	12.6083	0.0000	47,917.80	47,917.80	2.1953	0.4832	47,972.66
Total	40.7912	67.7872	202.7424	0.6043	45.9592	2.4640	48.4231	12.2950	2.4389	14.7349	0.0000	74,422.37	74,422.37	2.8429	0.4832	74,637.44

SWRCC-18
 (cont'd)

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

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

3.0 Construction Detail

Construction Phase

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

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 112.5

Acres of Paving: 0

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

OffRoad Equipment

SWRCC-18
(cont'd)

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

Trips and VMT

SWRCC-18
 (cont'd)

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

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	6	15.00	0.00	458.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	7	18.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	801.00	143.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	160.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Demolition - 2021

Unmitigated Construction On-Site

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

SWRCC-18
(cont'd)

3.2 Demolition - 2021
Unmitigated Construction Off-Site

Category	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.1304	4.1454	1.0182	0.0117	0.2669	0.0128	0.2797	0.0732	0.0122	0.0854		1,269,855	5	0.0908		1,272,125
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0532	0.0346	0.3963	1.1100e-003	0.1141	9.5000e-004	0.1151	0.0303	8.8000e-004	0.0311		110.4707	110.4707	3.3300e-003		110.5539
Total	0.1835	4.1800	1.4144	0.0128	0.3810	0.0137	0.3948	0.1034	0.0131	0.1165		1,380.326	1,380.326	0.0941		1,382.679

Mitigated Construction On-Site

Category	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Fugitive Dust					3.3074	0.0000	3.3074	0.5008	0.0000	0.5008			0.0000			0.0000
Off-Road	3.1651	31.4407	21.5650	0.0388		1.5513	1.5513	1.4411	1.4411	1.4411	0.0000	3,747,944	9	1.0549		3,774.317
Total	3.1651	31.4407	21.5650	0.0388	3.3074	1.5513	4.8588	0.5008	1.4411	1.9419	0.0000	3,747,944	9	1.0549		3,774.317

SWRCC-18
(cont'd)

3.2 Demolition - 2021
Mitigated Construction Off-Site

Category	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.1304	4.1454	1.0162	0.0117	0.2669	0.0128	0.2797	0.0732	0.0122	0.0854		1,269,855 ⁵	1,269,855 ⁵	0.0908		1,272,125 ²
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0532	0.0346	0.3963	1.100e-003	0.1141	9.5000e-004	0.1151	0.0303	8.8000e-004	0.0311		110.4707	110.4707	3.3300e-003		110.5539
Total	0.1835	4.1800	1.4144	0.0128	0.3810	0.0137	0.3948	0.1034	0.0131	0.1165		1,380,326²	1,380,326²	0.0941		1,382,679¹

3.3 Site Preparation - 2021
Unmitigated Construction On-Site

Category	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307			0.0000			0.0000
Off-Road	3.8862	40.4971	21.1543	0.0380	2.0445	2.0445	2.0445	1.8809	1.8809	1.8809		3,685,656 ⁹	3,685,656 ⁹	1.1920		3,715,457 ³
Total	3.8862	40.4971	21.1543	0.0380	18.0663	2.0445	20.1107	9.9307	1.8809	11.8116		3,685,656⁹	3,685,656⁹	1.1920		3,715,457³

SWRCC-18
(cont'd)

**3.3 Site Preparation - 2021
 Unmitigated Construction Off-Site**

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0638	0.0415	0.4755	1.3300e-003	0.1369	1.1400e-003	0.1381	0.0363	1.0500e-003	0.0374	132.5649	132.5649	3.8900e-003	0.0000	0.0000	132.6646	132.6646
Total	0.0638	0.0415	0.4755	1.3300e-003	0.1369	1.1400e-003	0.1381	0.0363	1.0500e-003	0.0374	132.5649	132.5649	3.8900e-003	0.0000	0.0000	132.6646	132.6646

Mitigated Construction On-Site

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	3.8862	40.4971	21.1543	0.0380	2.0445	2.0445	2.0445	1.8809	1.8809	1.8809	0.0000	3.685.6569	3.685.6569	1.1920	0.0000	3.715.4573	3.715.4573
Total	3.8862	40.4971	21.1543	0.0380	18.0663	2.0445	20.1107	9.9307	1.8809	11.8116	0.0000	3.685.6569	3.685.6569	1.1920	0.0000	3,715.4573	3,715.4573

SWRCC-18
(cont'd)

3.3 Site Preparation - 2021

Mitigated Construction Off-Site

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0638	0.0415	0.4755	1.3300e-003	0.1369	1.1400e-003	0.1381	0.0363	1.0500e-003	0.0374	132.5649	132.5649	132.5649	3.9900e-003		132.6646	132.6646
Total	0.0638	0.0415	0.4755	1.3300e-003	0.1369	1.1400e-003	0.1381	0.0363	1.0500e-003	0.0374	132.5649	132.5649	132.5649	3.9900e-003		132.6646	132.6646

3.4 Grading - 2021

Unmitigated Construction On-Site

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000	0.0000
Off-Road	4.1912	46.3998	30.8785	0.0620		1.9853	1.9853	1.8265	1.8265	1.8265	6.007.043	6.007.043	6.007.043	1.9428		6.055.613	6.055.613
Total	4.1912	46.3998	30.8785	0.0620	8.6733	1.9853	10.6587	3.5965	1.8265	5.4230	6.007.043	6.007.043	6.007.043	1.9428		6.055.613	6.055.613

SWRCC-18
(cont'd)

3.4 Grading - 2021
Unmitigated Construction Off-Site

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0709	0.0462	0.5284	1.4800e-003	0.1521	1.2700e-003	0.1534	0.0404	1.1700e-003	0.0415	147.2943	147.2943	4.4300e-003	147.2943	0.0000	147.4051	147.4051
Total	0.0709	0.0462	0.5284	1.4800e-003	0.1521	1.2700e-003	0.1534	0.0404	1.1700e-003	0.0415	147.2943	147.2943	4.4300e-003	147.2943	0.0000	147.4051	147.4051

Mitigated Construction On-Site

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	4.1912	46.3998	30.8785	0.0620	1.9853	1.9853	1.9853	1.8265	1.8265	1.8265	0.0000	6.007.043	6.007.043	1.9428	0.0000	6.055.613	6.055.613
Total	4.1912	46.3998	30.8785	0.0620	8.6733	1.9853	10.6587	3.5965	1.8265	5.4230	0.0000	6.007.043	6.007.043	1.9428	0.0000	6.055.613	6.055.613

SWRCC-18
(cont'd)

3.4 Grading - 2021

Mitigated Construction Off-Site

Category	lb/day											lb/day				
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0709	0.0462	0.5284	1.4800e-003	0.1521	1.2700e-003	0.1534	0.0404	1.1700e-003	0.0415	147.2943	147.2943	4.4300e-003	0.0000	0.0000	147.4051
Total	0.0709	0.0462	0.5284	1.4800e-003	0.1521	1.2700e-003	0.1534	0.0404	1.1700e-003	0.0415	147.2943	147.2943	4.4300e-003	0.0000	0.0000	147.4051

3.4 Grading - 2022

Unmitigated Construction On-Site

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

SWRCC-18
(cont'd)

3.4 Grading - 2022
Unmitigated Construction Off-Site

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0655	0.0416	0.4861	1.4300e-003	0.1521	1.2300e-003	0.1534	0.0404	1.1300e-003	0.0415	142.1207	142.1207	4.0000e-003	0.0000	0.0000	142.2207	142.2207
Total	0.0655	0.0416	0.4861	1.4300e-003	0.1521	1.2300e-003	0.1534	0.0404	1.1300e-003	0.0415	142.1207	142.1207	4.0000e-003	0.0000	0.0000	142.2207	142.2207

Mitigated Construction On-Site

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Fugitive Dust	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	3.6248	38.8435	29.0415	0.0621	8.6733	1.6349	1.6349	3.5965	1.5041	1.5041	0.0000	6.011.4105	6.011.4105	1.9442	0.0000	6.060.0158	6.060.0158
Total	3.6248	38.8435	29.0415	0.0621	8.6733	1.6349	10.3082	3.5965	1.5041	5.1006	0.0000	6.011.4105	6.011.4105	1.9442	0.0000	6.060.0158	6.060.0158

SWRCC-18
(cont'd)

3.4 Grading - 2022

Mitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000
Worker	0.0655	0.0416	0.4861	1.4300e-003	0.1521	1.2300e-003	0.1534	0.0404	1.1300e-003	0.0415	142.1207	142.1207	4.0000e-003	0.0000		142.2207
Total	0.0655	0.0416	0.4861	1.4300e-003	0.1521	1.2300e-003	0.1534	0.0404	1.1300e-003	0.0415	142.1207	142.1207	4.0000e-003	0.0000		142.2207

3.5 Building Construction - 2022

Unmitigated Construction On-Site

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

SWRCC-18
(cont'd)

3.5 Building Construction - 2022
Unmitigated Construction Off-Site

Category	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000
Vendor	0.4284	13.1673	3.8005	0.0354	0.9155	0.0256	0.9412	0.2636	0.0245	0.2881	3,769.075	0	3,769.075	0.2381		3,795.028
Worker	2.6620	1.6877	19.4698	0.0571	6.0932	0.0493	6.1425	1.6163	0.0454	1.6617	5,691.935	4	5,691.935	0.1602		5,695.940
Total	3.0904	14.8350	23.2704	0.0926	7.0087	0.0749	7.0836	1.8799	0.0699	1.9498	9,481.010	4	9,481.010	0.3984		9,490.969

Mitigated Construction On-Site

Category	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Off-Road	1.7062	15.6156	16.3634	0.0269		0.8090	0.8090		0.7612	0.7612	0.0000	2,554.333	2,554.333	0.6120		2,569.632
Total	1.7062	15.6156	16.3634	0.0269		0.8090	0.8090		0.7612	0.7612	0.0000	2,554.333	2,554.333	0.6120		2,569.632

SWRCC-18
(cont'd)

3.5 Building Construction - 2022
Mitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000
Vendor	0.4284	13.1673	3.8005	0.0354	0.9155	0.0256	0.9412	0.2636	0.0245	0.2881	0	3,789.075	3,789.075	0.2381		3,795.028
Worker	2.6620	1.6877	19.4698	0.0571	6.0932	0.0493	6.1425	1.6163	0.0454	1.6617	4	5,691.935	5,691.935	0.1602		5,695.940
Total	3.0904	14.8350	23.2704	0.0926	7.0087	0.0749	7.0836	1.8799	0.0699	1.9498	4	9,481.010	9,481.010	0.3984		9,490.969

3.5 Building Construction - 2023
Unmitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Off-Road	1.5728	14.3849	16.2440	0.0269		0.6997	0.6997		0.6584	0.6584		2,555.209	2,555.209	0.6079		2,570.406
Total	1.5728	14.3849	16.2440	0.0269		0.6997	0.6997		0.6584	0.6584		2,555.209	2,555.209	0.6079		2,570.406

SWRCC-18
(cont'd)

**3.5 Building Construction - 2023
 Unmitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000
Vendor	0.3183	9.9726	3.3771	0.0343	0.9156	0.0122	0.9277	0.2636	0.0116	0.2752	3,671,400 ⁷	3,671,400 ⁷	3,671,400 ⁷	0.2096		3,676,641 ⁷
Worker	2.5029	1.5073	17.8820	0.0550	6.0932	0.0479	6.1411	1.6163	0.0441	1.6604	5,483,797 ⁴	5,483,797 ⁴	5,483,797 ⁴	0.1442		5,487,402 ⁰
Total	2.8211	11.4799	21.2591	0.0893	7.0088	0.0601	7.0688	1.8799	0.0557	1.9356	9,155,198¹	9,155,198¹	9,155,198¹	0.3538		9,164,043⁷

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Off-Road	1.5728	14.3849	16.2440	0.0269		0.6997	0.6997		0.6584	0.6584	0.0000	2,555,209 ⁹	2,555,209 ⁹	0.6079		2,570,406 ¹
Total	1.5728	14.3849	16.2440	0.0269		0.6997	0.6997		0.6584	0.6584	0.0000	2,555,209⁹	2,555,209⁹	0.6079		2,570,406¹

SWRCC-18
(cont'd)

3.5 Building Construction - 2023
Mitigated Construction Off-Site

Category	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.3183	9.9726	3.3771	0.0343	0.9156	0.0122	0.9277	0.2636	0.0116	0.2752	3,671,400 ⁷	3,671,400 ⁷	3,671,400 ⁷	0.2096		3,676,641 ⁷
Worker	2.5029	1.5073	17.8820	0.0550	6.0932	0.0479	6.1411	1.6163	0.0441	1.6604	5,483,797 ⁴	5,483,797 ⁴	5,483,797 ⁴	0.1442		5,487,402 ⁰
Total	2.8211	11.4799	21.2591	0.0893	7.0088	0.0601	7.0688	1.8799	0.0557	1.9356	9,155,198¹	9,155,198¹	9,155,198¹	0.3538		9,164,043⁷

3.6 Paving - 2023
Unmitigated Construction On-Site

Category	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Off-Road	1.0327	10.1917	14.5842	0.0228		0.5102	0.5102		0.4694	0.4694	2,207,584 ¹	2,207,584 ¹	2,207,584 ¹	0.7140		2,225,433 ⁶
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	1.0327	10.1917	14.5842	0.0228		0.5102	0.5102		0.4694	0.4694	2,207,584¹	2,207,584¹	2,207,584¹	0.7140		2,225,433⁶

SWRCC-18
(cont'd)

3.6 Paving - 2023

Unmitigated Construction Off-Site

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0469	0.0282	0.3349	1.0300e-003	0.1141	9.0000e-004	0.1150	0.0303	8.3000e-004	0.0311	102.6928	102.6928	2.7000e-003	0.0000	0.0000	102.7603	0.0000
Total	0.0469	0.0282	0.3349	1.0300e-003	0.1141	9.0000e-004	0.1150	0.0303	8.3000e-004	0.0311	102.6928	102.6928	2.7000e-003	0.0000	0.0000	102.7603	0.0000

Mitigated Construction On-Site

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Off-Road	1.0327	10.1917	14.5642	0.0228	0.5102	0.5102	0.5102	0.4694	0.4694	0.4694	0.0000	2.207584	2.207584	0.7140	0.0000	2.2254336	0.0000
Paving	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	1.0327	10.1917	14.5642	0.0228	0.5102	0.5102	0.5102	0.4694	0.4694	0.4694	0.0000	2.207584	2.207584	0.7140	0.0000	2.2254336	0.0000

SWRCC-18
(cont'd)

3.6 Paving - 2023

Mitigated Construction Off-Site

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0469	0.0282	0.3349	1.0300e-003	0.1141	9.0000e-004	0.1150	0.0303	8.3000e-004	0.0311	102.6928	102.6928	2.7000e-003	0.0000	0.0000	102.7603	0.0000
Total	0.0469	0.0282	0.3349	1.0300e-003	0.1141	9.0000e-004	0.1150	0.0303	8.3000e-004	0.0311	102.6928	102.6928	2.7000e-003	0.0000	0.0000	102.7603	0.0000

3.6 Paving - 2024

Unmitigated Construction On-Site

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Off-Road	0.9882	9.5246	14.6258	0.0228	0.4685	0.4685	0.4685	0.4310	0.4310	0.4310	2,207.547 ₂	2,207.547 ₂	0.7140	0.7140	0.0000	2,225.396 ₃	0.0000
Paving	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.9882	9.5246	14.6258	0.0228	0.4685	0.4685	0.4685	0.4310	0.4310	0.4310	2,207.547₂	2,207.547₂	0.7140	0.7140	0.0000	2,225.396₃	0.0000

SWRCC-18
(cont'd)

3.6 Paving - 2024
Unmitigated Construction Off-Site

Category	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0444	0.0257	0.3114	1.0000e-003	0.1141	8.8000e-004	0.1150	0.0303	8.1000e-004	0.0311	99.5045	99.5045	2.4700e-003	0.0000	0.0000	99.5663
Total	0.0444	0.0257	0.3114	1.0000e-003	0.1141	8.8000e-004	0.1150	0.0303	8.1000e-004	0.0311	99.5045	99.5045	2.4700e-003	0.0000	0.0000	99.5663

Mitigated Construction On-Site

Category	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Off-Road	0.9882	9.5246	14.6258	0.0228	0.4685	0.4685	0.4685	0.4310	0.4310	0.4310	0.0000	2.207547 ²	2.207547 ²	0.7140	0.0000	2.225396 ³
Paving	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.9882	9.5246	14.6258	0.0228	0.4685	0.4685	0.4685	0.4310	0.4310	0.4310	0.0000	2.207547²	2.207547²	0.7140	0.0000	2.225396³

SWRCC-18
(cont'd)

3.6 Paving - 2024

Mitigated Construction Off-Site

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0444	0.0257	0.3114	1.0000e-003	0.1141	8.8000e-004	0.1150	0.0303	8.1000e-004	0.0311	99.5045	99.5045	2.4700e-003	0.0000	0.0000	99.5663	99.5663
Total	0.0444	0.0257	0.3114	1.0000e-003	0.1141	8.8000e-004	0.1150	0.0303	8.1000e-004	0.0311	99.5045	99.5045	2.4700e-003	0.0000	0.0000	99.5663	99.5663

3.7 Architectural Coating - 2024

Unmitigated Construction On-Site

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Archit. Coating	236.4115					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000	0.0000
Off-Road	0.1808	1.2188	1.8101	2.9700e-003		0.0609	0.0609		0.0609	0.0609	281.4481	281.4481	281.4481	0.0159		281.8443	281.8443
Total	236.5923	1.2188	1.8101	2.9700e-003		0.0609	0.0609		0.0609	0.0609	281.4481	281.4481	281.4481	0.0159		281.8443	281.8443

SWRCC-18
(cont'd)

3.7 Architectural Coating - 2024
Unmitigated Construction Off-Site

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.4734	0.2743	3.3220	0.0107	1.2171	9.4300e-003	1.2266	0.3223	8.6800e-003	0.3315	1,061,381 ⁸	1,061,381 ⁸	0.0264	0.0264	0.0000	1,062,041 ⁰	0.0000
Total	0.4734	0.2743	3.3220	0.0107	1.2171	9.4300e-003	1.2266	0.3223	8.6800e-003	0.3315	1,061,381⁸	1,061,381⁸	0.0264	0.0264	0.0000	1,062,041⁰	0.0000

Mitigated Construction On-Site

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Archit. Coating	236.4115					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000	
Off-Road	0.1808	1.2188	1.8101	2.9700e-003		0.0609	0.0609		0.0609	0.0609	0.0000	281,4481	281,4481	0.0159	0.0159	281.8443	
Total	236.5923	1.2188	1.8101	2.9700e-003		0.0609	0.0609		0.0609	0.0609	0.0000	281,4481	281,4481	0.0159	0.0159	281.8443	0.0000

SWRCC-18
(cont'd)

**3.7 Architectural Coating - 2024
 Mitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.4734	0.2743	3.3220	0.0107	1.2171	9.4300e-003	1.2266	0.3223	8.6800e-003	0.3315	1.061381e-08	1.061381e-08	0.0264	0.0264	0.0000	1.062,0410
Total	0.4734	0.2743	3.3220	0.0107	1.2171	9.4300e-003	1.2266	0.3223	8.6800e-003	0.3315	1.061381e-08	1.061381e-08	0.0264	0.0264	0.0000	1,062,0410

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

SWRCC-18
 (cont'd)

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

Category	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Mitigated	9.5233	45.9914	110.0422	0.4681	45.9992	0.3373	46.2965	12.2950	0.3132	12.6083		47,917.80 05	47,917.80 05	2.1953		47,972.68 39
Unmitigated	9.5233	45.9914	110.0422	0.4681	45.9992	0.3373	46.2965	12.2950	0.3132	12.6083		47,917.80 05	47,917.80 05	2.1953		47,972.68 39

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated Annual VMT	Mitigated Annual VMT
	Weekday	Saturday	Sunday		
Apartments Low Rise	145.75	154.25	154.00	506,227	506,227
Apartments Mid Rise	4,026.75	3,773.25	4075.50	13,660,065	13,660,065
General Office Building	288.45	62.55	31.05	706,812	706,812
High Turnover (Sit Down Restaurant)	2,368.80	2,873.52	2817.72	3,413,937	3,413,937
Hotel	192.00	167.50	160.00	445,703	445,703
Quality Restaurant	501.12	511.92	461.20	707,488	707,488
Regional Shopping Center	528.08	601.44	357.84	1,112,221	1,112,221
Total	8,050.95	8,164.43	8,057.31	20,552,452	20,552,452

4.3 Trip Type Information

SWRCC-18
(cont'd)

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

Land Use	Miles								Trip %				Trip Purpose %			
	H-W or C-W	H-S or C-C	H-O or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-C	H-O or C-NW	Primary	Diverted	Pass-by	
Apartments Low Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3							
Apartments Mid Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3							
General Office Building	16.60	8.40	6.90	33.00	48.00	19.00	77	19	4							
High Turnover (Sit Down Hotel)	16.60	8.40	6.90	8.50	72.50	19.00	37	20	43							
Quality Restaurant	16.60	8.40	6.90	19.40	61.60	19.00	58	38	4							
Regional Shopping Center	16.60	8.40	6.90	12.00	66.00	19.00	38	18	44							
	16.60	8.40	6.90	16.30	64.70	19.00	54	35	11							

4.4 Fleet Mix

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

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

SWRCC-18
(cont'd)

Category	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Natural Gas Mitigated	0.7660	6.7462	4.2573	0.0418	0.5292	0.5292	0.5292	0.5292	0.5292	0.5292	0.355983	0.355983	18,355.983	0.1602	0.1532	8,405.638
Natural Gas Unmitigated	0.7660	6.7462	4.2573	0.0418	0.5292	0.5292	0.5292	0.5292	0.5292	0.5292	0.355983	0.355983	18,355.983	0.1602	0.1532	8,405.638

SWRCC-18
(cont'd)

**5.2 Energy by Land Use - NaturalGas
 Unmitigated**

Land Use	NaturalGas Use kBTU/yr	lb/day										lb/day			CO2e		
		ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2		CH4	N2O
Apartments Low Rise	1119.16	0.0121	0.1031	0.0439	6.6000e-004	8.3400e-003	8.3400e-003	8.3400e-003	8.3400e-003	8.3400e-003	8.3400e-003	131.6662	131.6662	131.6662	2.5200e-003	2.4100e-003	132.4486
Apartments Mid Rise	35764.3	0.3659	3.2976	1.4033	0.0211	0.2666	0.2666	0.2666	0.2666	0.2666	0.2666	4,209,916	4,209,916	4,209,916	0.0807	0.0772	4,234,833
General Office Building	1283.42	0.0138	0.1258	0.1057	7.5000e-004	9.5600e-003	9.5600e-003	9.5600e-003	9.5600e-003	9.5600e-003	9.5600e-003	150.9911	150.9911	150.9911	2.8900e-003	2.7700e-003	151.8684
High Turnover (Sit Down Restaurant)	22759.9	0.2455	2.2314	1.8743	0.0184	0.1696	0.1696	0.1696	0.1696	0.1696	0.1696	2,677,634	2,677,634	2,677,634	0.0513	0.0491	2,693,546
Hotel	4769.72	0.0514	0.4676	0.3928	2.8100e-003	0.0355	0.0355	0.0355	0.0355	0.0355	0.0355	561.1436	561.1436	561.1436	0.0108	0.0103	564.4782
Quality Restaurant	5057.75	0.0545	0.4959	0.4165	2.8000e-003	0.0377	0.0377	0.0377	0.0377	0.0377	0.0377	595.0290	595.0290	595.0290	0.0114	0.0109	596.5658
Regional Shopping Center	251,616	2.7100e-003	0.0247	0.0207	1.5000e-004	1.8700e-003	1.8700e-003	1.8700e-003	1.8700e-003	1.8700e-003	1.8700e-003	29,6019	29,6019	29,6019	5.7000e-004	5.4000e-004	29,7778
Total		0.7660	6.7463	4.2573	0.0418	0.5292	0.5292	0.5292	0.5292	0.5292	0.5292	8,355,983	8,355,983	8,355,983	0.1602	0.1532	8,405,638

SWRCC-18
 (cont'd)

5.2 Energy by Land Use - NaturalGas Mitigated

Land Use	NaturalGas Use kBTU/yr	lb/day										lb/day					
		ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Apartments Low Rise	1.11916	0.0121	0.1031	0.0439	6.6000e-004	8.3400e-003	8.3400e-003	8.3400e-003	8.3400e-003	8.3400e-003	131.6662	131.6662	131.6662	2.5200e-003	2.4100e-003	2.4100e-003	132.4486
Apartments Mid Rise	33.7843	0.3859	3.2978	1.4033	0.0211	0.2666	0.2666	0.2666	0.2666	0.2666	4,209.9164	4,209.9164	4,209.9164	0.0807	0.0772	0.0772	4,234.8339
General Office Building	1.26342	0.0138	0.1258	0.1057	7.5000e-004	9.5600e-003	9.5600e-003	9.5600e-003	9.5600e-003	9.5600e-003	150.9911	150.9911	150.9911	2.8900e-003	2.7700e-003	2.7700e-003	151.8884
High Turnover (Sit Down Restaurant)	22.7599	0.2455	2.2314	1.8743	0.0184	0.1696	0.1696	0.1696	0.1696	0.1696	2,677.6342	2,677.6342	2,677.6342	0.0513	0.0491	0.0491	2,693.5460
Hotel	4.76972	0.0514	0.4676	0.3928	2.8100e-003	0.0355	0.0355	0.0355	0.0355	0.0355	561.1436	561.1436	561.1436	0.0108	0.0103	0.0103	564.4782
Quality Restaurant	5.05775	0.0545	0.4959	0.4165	2.8000e-003	0.0377	0.0377	0.0377	0.0377	0.0377	595.0290	595.0290	595.0290	0.0114	0.0109	0.0109	596.5658
Regional Shopping Center	0.251616	2.7100e-003	0.0247	0.0207	1.5000e-004	1.8700e-003	1.8700e-003	1.8700e-003	1.8700e-003	1.8700e-003	29.6019	29.6019	29.6019	5.7000e-004	5.4000e-004	5.4000e-004	29.7778
Total		0.7660	6.7463	4.2573	0.0418	0.5292	0.5292	0.5292	0.5292	0.5292	8,355.9832	8,355.9832	8,355.9832	0.1602	0.1532	0.1532	8,405.6387

6.0 Area Detail

6.1 Mitigation Measures Area

SWRCC-18
(cont'd)

Category	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Mitigated	30.5020	15.0496	88.4430	0.0944	1.5974	1.5974	1.5974	1.5974	1.5974	1.5974	0.0000	18,148.59	18,148.59	0.4874	0.3300	18,259.11
Unmitigated	30.5020	15.0496	88.4430	0.0944	1.5974	1.5974	1.5974	1.5974	1.5974	1.5974	0.0000	18,148.59	18,148.59	0.4874	0.3300	18,259.11

6.2 Area by SubCategory

Unmitigated

SubCategory	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Architectural Coating	2.2670				0.0000	0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	24.1065				0.0000	0.0000			0.0000	0.0000			0.0000			0.0000
Heath	1.6500	14.1000	6.0000	0.0900	1.1400	1.1400	1.1400	1.1400	1.1400	1.1400	0.0000	18,000.00	18,000.00	0.3450	0.3300	18,106.96
Landscaping	2.4766	0.9496	82.4430	4.3600e-003	0.4574	0.4574	0.4574	0.4574	0.4574	0.4574		148.5950	148.5950	0.1424		152.1542
Total	30.5020	15.0496	88.4430	0.0944	1.5974	1.5974	1.5974	1.5974	1.5974	1.5974	0.0000	18,148.59	18,148.59	0.4874	0.3300	18,259.11

SWRCC-18
(cont'd)

**6.2 Area by SubCategory
 Mitigated**

SubCategory	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Architectural Coating	2.2670				0.0000	0.0000	0.0000	0.0000	0.0000	0.0000			0.0000			0.0000
Consumer Products	24.1085				0.0000	0.0000	0.0000	0.0000	0.0000	0.0000			0.0000			0.0000
Hearth	1.6500	14.1000	6.0000	0.0900	1.1400	1.1400	1.1400	1.1400	1.1400	1.1400	0.0000	18,000.00	18,000.00	0.3450	0.3300	18,106.96
Landscaping	2.4786	0.9496	82.4430	4.3600e-003	0.4574	0.4574	0.4574	0.4574	0.4574	0.4574		148.5950	148.5950	0.1424		152.1542
Total	30.5020	15.0496	88.4430	0.0944	1.5974	1.5974	1.5974	1.5974	1.5974	1.5974	0.0000	18,148.59	18,148.59	0.4874	0.3300	18,259.11

7.0 Water Detail

7.1 Mitigation Measures Water

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

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

10.0 Stationary Equipment

SWRCC-18
(cont'd)

Fire Pumps and Emergency Generators

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

Boilers

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

User Defined Equipment

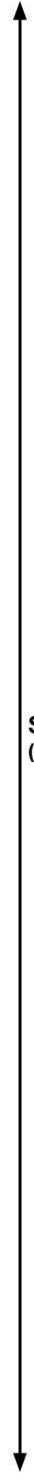
Equipment Type	Number

11.0 Vegetation

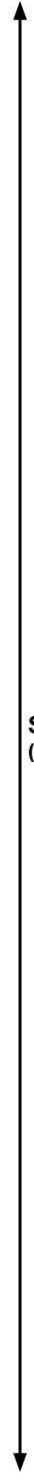
SWRCC-18
 (cont'd)

Attachment C

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



SWRCC-18
(cont'd)



SWRCC-18
(cont'd)

EXHIBIT B



SOIL WATER AIR PROTECTION ENTERPRISE
2656 29th Street, Suite 201
Santa Monica, California 90405
Attn: Paul Rosenfeld, Ph.D.
Mobil: (310) 795-2335
Office: (310) 452-5555
Fax: (310) 452-5550
Email: prosenfeld@swape.com

Paul Rosenfeld, Ph.D.

Chemical Fate and Transport & Air Dispersion Modeling

Principal Environmental Chemist

Risk Assessment & Remediation Specialist

Education

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

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

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

Professional Experience

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

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

SWRCC-18
(cont'd)

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 Aermid 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.

Cheremisnoff, 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 Saugat, 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.

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

Cheremisnoff, 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.

SWRCC-18
(cont'd)

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

Tam L. K., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008). Methods For Collect Samples For Assessing Dioxins And Other Environmental Contaminants In Attic Dust: A Review. *Organohalogen Compounds*, 70, 000527-000530.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

SWRCC-18
(cont'd)

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

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

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

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

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

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

Presentations:

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

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

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

Rosenfeld, P.E. (April 19-23, 2009). Perfluorooctanoic Acid (PFOA) and Perfluorooctane 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 Florida, 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.

SWRCC-18
(cont'd)

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.

SWRCC-18
(cont'd)

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

SWRCC-18
(cont'd)

Deposition and/or Trial Testimony:

- In the United States District Court For The District of New Jersey
Duarte et al, *Plaintiffs*, vs. United States Metals Refining Company et. al. *Defendant*.
Case No.: 2:17-cv-01624-ES-SCM
Rosenfeld Deposition. 6-7-2019
- In the United States District Court of Southern District of Texas Galveston Division
M/T Carla Maersk, *Plaintiffs*, vs. Conti 168., Schiffahrts-GMBH & Co. Bulker KG MS “Conti Perdido”
Defendant.
Case No.: 3:15-CV-00106 consolidated with 3:15-CV-00237
Rosenfeld Deposition. 5-9-2019
- In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica
Carole-Taddeo-Bates et al., vs. Ifran Khan et al., Defendants
Case No.: No. BC615636
Rosenfeld Deposition, 1-26-2019
- In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica
The San Gabriel Valley Council of Governments et al. vs El Adobe Apts. Inc. et al., Defendants
Case No.: No. BC646857
Rosenfeld Deposition, 10-6-2018; Trial 3-7-19
- In United States District Court For The District of Colorado
Bells et al. Plaintiff vs. The 3M Company et al., Defendants
Case: No 1:16-cv-02531-RBJ
Rosenfeld Deposition, 3-15-2018 and 4-3-2018
- In The District Court Of Regan County, Texas, 112th Judicial District
Phillip Bales et al., Plaintiff vs. Dow Agrosiences, LLC, et al., Defendants
Cause No 1923
Rosenfeld Deposition, 11-17-2017
- In The Superior Court of the State of California In And For The County Of Contra Costa
Simons et al., Plaintiffs vs. Chevron Corporation, et al., Defendants
Cause No C12-01481
Rosenfeld Deposition, 11-20-2017
- In The Circuit Court Of The Twentieth Judicial Circuit, St Clair County, Illinois
Martha Custer et al., Plaintiff vs. Cerro Flow Products, Inc., Defendants
Case No.: No. 0i9-L-2295
Rosenfeld Deposition, 8-23-2017
- In The Superior Court of the State of California, For The County of Los Angeles
Warrn Gilbert and Penny Gilber, Plaintiff vs. BMW of North America LLC
Case No.: LC102019 (c/w BC582154)
Rosenfeld Deposition, 8-16-2017, Trail 8-28-2018
- In the Northern District Court of Mississippi, Greenville Division
Brenda J. Cooper, et al., *Plaintiffs*, vs. Meritor Inc., et al., *Defendants*
Case Number: 4:16-cv-52-DMB-JVM
Rosenfeld Deposition: July 2017

SWRCC-18
(cont'd)

- In The Superior Court of the State of Washington, County of Snohomish
Michael Davis and Julie Davis et al., Plaintiff vs. Cedar Grove Composting Inc., Defendants
Case No.: No. 13-2-03987-5
Rosenfeld Deposition, February 2017
Trial, March 2017
- In The Superior Court of the State of California, County of Alameda
Charles Spain., Plaintiff vs. Thermo Fisher Scientific, et al., Defendants
Case No.: RG14711115
Rosenfeld Deposition, September 2015
- In The Iowa District Court In And For Poweshiek County
Russell D. Winburn, et al., Plaintiffs vs. Doug Hoksbergen, et al., Defendants
Case No.: LALA002187
Rosenfeld Deposition, August 2015
- In The Iowa District Court For Wapello County
Jerry Dovico, et al., Plaintiffs vs. Valley View Sine LLC, et al., Defendants
Law No.: LALA105144 - Division A
Rosenfeld Deposition, August 2015
- In The Iowa District Court For Wapello County
Doug Pauls, et al., et al., Plaintiffs vs. Richard Warren, et al., Defendants
Law No.: LALA105144 - Division A
Rosenfeld Deposition, August 2015
- In The Circuit Court of Ohio County, West Virginia
Robert Andrews, et al. v. Antero, et al.
Civil Action N0. 14-C-30000
Rosenfeld Deposition, June 2015
- In The Third Judicial District County of Dona Ana, New Mexico
Betty Gonzalez, et al. Plaintiffs vs. Del Oro Dairy, Del Oro Real Estate LLC, Jerry Settles and Deward
DeRuyter, Defendants
Rosenfeld Deposition: July 2015
- In The Iowa District Court For Muscatine County
Laurie Freeman et. al. Plaintiffs vs. Grain Processing Corporation, Defendant
Case No 4980
Rosenfeld Deposition: May 2015
- In the Circuit Court of the 17th Judicial Circuit, in and For Broward County, Florida
Walter Hinton, et. al. Plaintiff, vs. City of Fort Lauderdale, Florida, a Municipality, Defendant.
Case Number CACE07030358 (26)
Rosenfeld Deposition: December 2014
- In the United States District Court Western District of Oklahoma
Tommy McCarty, et al., Plaintiffs, v. Oklahoma City Landfill, LLC d/b/a Southeast Oklahoma City
Landfill, et al. Defendants.
Case No. 5:12-cv-01152-C
Rosenfeld Deposition: July 2014

SWRCC-18
(cont'd)

In the County Court of Dallas County Texas

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

In the Court of Common Pleas of Tuscarawas County Ohio

John Michael Abicht, et al., *Plaintiffs*, vs. Republic Services, Inc., et al., *Defendants*
Case Number: 2008 CT 10 0741 (Cons. w/ 2009 CV 10 0987)
Rosenfeld Deposition: October 2012

In the United States District Court of Southern District of Texas Galveston Division

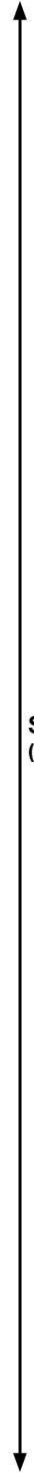
Kyle Cannon, Eugene Donovan, Genaro Ramirez, Carol Sassler, and Harvey Walton, each Individually and on behalf of those similarly situated, *Plaintiffs*, vs. BP Products North America, Inc., *Defendant*.
Case 3:10-cv-00622
Rosenfeld Deposition: February 2012
Rosenfeld Trial: April 2013

In the Circuit Court of Baltimore County Maryland

Philip E. Cvach, II et al., *Plaintiffs* vs. Two Farms, Inc. d/b/a Royal Farms, Defendants
Case Number: 03-C-12-012487 OT
Rosenfeld Deposition: September 2013



SWRCC-18
(cont'd)



SWRCC-18
(cont'd)

EXHIBIT C



1640 5th St., Suite 204 Santa
Santa Monica, California 90401
Tel: (949) 887-9013
Email: mhagemann@swape.com

Matthew F. Hagemann, P.G., C.Hg., QSD, QSP

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

Education:

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

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

Professional Certifications:

California Professional Geologist
California Certified Hydrogeologist
Qualified SWPPP Developer and Practitioner

Professional Experience:

Matt has 25 years of experience in environmental policy, assessment and remediation. He spent nine years with the U.S. EPA in the RCRA and Superfund programs and served as EPA's Senior Science Policy Advisor in the Western Regional Office where he identified emerging threats to groundwater from perchlorate and MTBE. While with EPA, Matt also served as a Senior Hydrogeologist in the oversight of the assessment of seven major military facilities undergoing base closure. He led numerous enforcement actions under provisions of the Resource Conservation and Recovery Act (RCRA) while also working with permit holders to improve hydrogeologic characterization and water quality monitoring.

Matt has worked closely with U.S. EPA legal counsel and the technical staff of several states in the application and enforcement of RCRA, Safe Drinking Water Act and Clean Water Act regulations. Matt has trained the technical staff in the States of California, Hawaii, Nevada, Arizona and the Territory of Guam in the conduct of investigations, groundwater fundamentals, and sampling techniques.

Positions Matt has held include:

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

**SWRCC-18
(cont'd)**

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

Senior Regulatory and Litigation Support Analyst:

With SWAPE, Matt’s responsibilities have included:

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

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

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

- Expert witness testimony in a case of oil production-related contamination in Mississippi.
- Lead author for a multi-volume remedial investigation report for an operating school in Los Angeles that met strict regulatory requirements and rigorous deadlines.

SWRCC-18
(cont'd)

- Development of strategic approaches for cleanup of contaminated sites in consultation with clients and regulators.

Executive Director:

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

Hydrogeology:

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

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

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

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

- Received an EPA Bronze Medal for his contribution to the development of national guidance for the protection of drinking water.
- Managed the Sole Source Aquifer Program and protected the drinking water of two communities through designation under the Safe Drinking Water Act. He prepared geologic reports, conducted public hearings, and responded to public comments from residents who were very concerned about the impact of designation.

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

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

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

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

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

Policy:

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

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

Geology:

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

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

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

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

Teaching:

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

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

Matt taught physical geology (lecture and lab and introductory geology at Golden West College in Huntington Beach, California from 2010 to 2014.

Invited Testimony, Reports, Papers and Presentations:

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

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

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

SWRCC-18
(cont'd)

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.

SWRCC-18
(cont'd)

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

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

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

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

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

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

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

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

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

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

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

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

SWRCC-18
(cont'd)

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

Other Experience:

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

SWRCC-18
(cont'd)

9.3.11.1 Response to Letter from Southwest Regional Council of Carpenters (via Mitchell M. Tsai, Attorney at Law)

Comment No.	Response
SWRCC-1	The comment states that the Southwest Regional Council of Carpenters (SWRCC) background and requests notice of actions related to the project. No changes in the environmental document are necessary in response to this comment.
SWRCC-2	The comment suggests the County should require the applicant to provide additional community benefits such as requiring local hire and use of a skilled and trained workforce to build the project. As described in Section 4.14 of the EIR, construction jobs are anticipated to be served by the local construction workforce. The project does not propose unique components or construction activities that would likely require a specialized or unique workforce that is located outside of the County. Use of a localized workforce would both reduce greenhouse gas emissions and provide local economic benefit, as stated in this comment. No changes to the EIR are necessary.
SWRCC-3	The comment summarizes the basic purposes of CEQA to provide public agencies and the public with information about potential environmental effects. No changes to the environmental document are necessary in response to this comment.
SWRCC-4	The comment states that the City must adopt a mandatory finding of significance that the project may cause a substantial adverse effect on human beings and mitigate COVID-19 impacts. A global pandemic is not an environmental impact and would not result in adverse physical changes to the environment. No changes to the environmental document are necessary in response to this comment.
SWRCC-5	The comment states that the DEIR fails to support its findings with substantial evidence and provides background information related to the requirements of CEQA but does not specify which information, analysis, or findings included in the DEIR is not supported by substantial evidence. No changes in the environmental document are necessary in response to this comment.
SWRCC-6	The comment states that the DEIR omits critical supporting information regarding the project's noise impact and improperly finds that the project's noise impact would be less than significant. Please refer to response to comment SWRCC-7.
SWRCC-7	The comment states that the DEIR does not state what the noise level is at the easternmost portion of the site. Predicted future noise levels along the eastern portion of the project site are depicted on Figure 4 of the Noise Impact Assessment prepared for the project (refer to Appendix I). As noted, the predicted 70, 65, and 60 dBA CNEL noise contours would extend to approximately 220 feet, 468 feet, and 1,005 feet from the centerline of US 101, respectively. Predicted noise levels at some proposed noise-sensitive land uses located within these projected noise contours could potentially exceed the County's applicable noise standards for determination of land use compatibility. Mitigation Measure N/mm-1.2 would require acoustical assessments to be prepared as part of the County development review process for future noise-sensitive land uses when design details for those future uses are known (building orientation, outdoor vs. indoor areas, contours, screening). Where the acoustical assessment determines predicted noise levels would exceed applicable standards, noise-mitigation measures would be required sufficient to ensure compliance with County noise standards. Such measures may include, but are not limited to, incorporation of setbacks, sound barriers, or berms. No changes to the environmental document are necessary in response to this comment.
SWRCC-8	The comment states that the DEIR fails to consider all feasible mitigations for transportation impacts and provides supporting CEQA legislation. Please refer to response to comments SWRCC-9 through SWRCC-12. No changes to the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration.
SWRCC-9	The comment states that the DEIR fails to consider such feasible mitigation measures such as VMT bank mitigations and, as such, the DEIR should be recirculated with more considerations. Refer to response to comment SWRCC-10.
SWRCC-10	The comment states that the DEIR fails CEQA's information requirements, failing to analyze potential mitigation measures, but also fails CEQA's substantive requirements that all feasible mitigation measures be adopted. All feasible VMT reduction measures have been incorporated into mitigation measures for the project per recognized state and local guidance. Fehr & Peers is, to the EIR preparers knowledge, not associated with this project. Therefore, this comment may relate to a different project.
SWRCC-11	The comment appears to relate to the Western Riverside Council of Governments and potentially the City of Riverside. No changes to the environmental document are necessary in response to this comment.

Comment No.	Response
SWRCC-12	The comment states that local skilled and trained workforce requirements can also significantly reduce VMT and associated air pollutant emissions. Please refer to response to comment SWRCC-2.
SWRCC-13	The comment reiterates previous comments. Refer to response to comments SWRCC-9 through SWRCC-12. No changes to the environmental document are necessary in response to this comment.
SWRCC-14	The comment states that the DEIR fails to consider a reduction in size of the project as a method to reduce ROG and NOx impacts. As discussed in Chapter 5, <i>Alternatives Analysis</i> , several alternatives were considered which would reduce the size of the project and result in reduced air quality impacts compared to the proposed project. No changes to the environmental document are necessary in response to this comment.
SWRCC-15	The comment provides background CEQA information regarding conflicts with general plan policy. No changes in the environmental document are necessary in response to this comment. Refer also to Section 2.5.4 of the EIR, which describes the proposed General Plan Amendment being processed concurrently with the DRSP.
SWRCC-16	The comment states the DEIR is required to review the project's consistency with regional housing plans, sustainable community strategy and regional transportation plans. The DEIR includes analysis of the project's consistency with applicable housing plans in Section 4.11, <i>Land Use and Planning</i> , and Section 4.14, <i>Population and Housing</i> . The DEIR includes an analysis of the project's consistency with the sustainable community strategy in Section 4.3, <i>Air Quality</i> , Section 4.8, <i>Greenhouse Gas Emissions</i> , Section 4.11, <i>Land Use and Planning</i> , and Section 4.14, <i>Population and Housing</i> . The DEIR includes analysis of the project's consistency with regional transportation plans in Section 4.11, <i>Land Use and Planning</i> , and Section 4.17, <i>Transportation</i> . No changes to the environmental document are necessary in response to this comment.
SWRCC-17	The comment requests that the City revise and recirculate the DEIR for public comment to address the aforementioned concerns. Please refer to response to comments SWRCC-1 through SWRCC-16. No changes to the environmental document are necessary in response to this comment.
SWRCC-18	The comment has included Local Hire Requirements and Considerations for Greenhouse Gas Modeling for reference. No changes to the environmental document are necessary in response to this comment.

9.3.12 Environmental Center of San Luis Obispo

Mail: P.O. Box 1014
San Luis Obispo, CA 93406
Office: 1012 Pacific St., Ste B-1
San Luis Obispo, CA 93401



Phone: (805) 544-1777
Email: info@ecoslo.org
Online: www.ECOSLO.org

Protecting and preserving San Luis Obispo County's natural environment since 1971

To Whom It May Concern,

As a representative of the Environmental Center of San Luis Obispo (ECOSLO), I am writing in regards to the Draft Environmental Impact Report (DPEIR) SCH#2021060558 for the Dana Reserve Specific Plan. ECOSLO is greatly concerned about the potential significant and unavoidable impacts of this Project. The proposed 1,289 residential units and 110,000-203,000 sq. ft. of commercial development on a 288-acres on the Nipomo Mesa would bring with it numerous significant and unavoidable impacts while pushing forward with what we consider to be environmentally irresponsible development practices.

ECOSLO-1

Chief among the impacts listed in the DEIR are the significant and unavoidable impacts to special-status plant and wildlife species. The proposed removal of 3,943 oak trees within the Project area would impact 21.7 acres of coast live oak forest and 75.3 acres of coast live oak woodland (97 acres total). Even with the proposed mitigation the DEIR still notes that the removal is, "a significant net loss of oak trees and acreage of oak woodlands in the county." The same can be said of the project's impacts to the Burton Mesa Chaparral. The Burton Mesa Chaparral is one of the rarest natural communities throughout San Luis Obispo county, and one that is rapidly disappearing on the Nipomo Mesa. As with the proposed removal of oak trees, the DEIR notes that even with the mitigation put forward, "the limited availability of off-site mitigation parcels and the limited on-site opportunities to restore and maintain the ecological integrity of this ecosystem, potential impacts would be significant and unavoidable." But these are not the only impacts ECOSLO is concerned about. The DEIR also lists significant and unavoidable impacts to Air Quality, Greenhouse Gas (GHG) Emissions, Land Use, Population and Housing, Transportation, and Growth-Inducement.

ECOSLO-2

While ECOSLO understands the importance of increased housing supply, we firmly believe that this Project does not meet the principles of what we consider to be responsible development. The proposal is not focused on limiting urban sprawl, respecting historic and cultural resources, and reducing our impact on the natural world. Of the alternatives put forward in the DEIR, ECOSLO supports moving forward with the Environmentally Superior Alternative of Alternative 3, the Residential Rural Cluster Subdivision alternative. While it may not meet the County's housing supply goals, it would reduce impacts related to Biological Resources, GHG Emissions, Land Use and Planning, Population and Housing, and Public Services.

ECOSLO-3

Residents of San Luis Obispo County should not have to choose between increasing suburban sprawl and affordable housing, and we are disappointed that this Project asks that we do so once again. We hope that the County takes these concerns into account and thank you for your time and attention to this matter.

ECOSLO-4

Regards,

Grant Helete, Community Organizer
ECOSLO - Environmental Center of San Luis Obispo

9.3.12.1 **Response to Letter from Environmental Center of San Luis Obispo**

Comment No.	Response
ECOSLO-1	The comment states that the Environmental Center of San Luis Obispo (ECOSLO) believes the project would bring numerous significant and unavoidable impacts while pushing forward environmentally irresponsible development practices. These impacts are identified in the EIR. No changes to the environmental document are necessary in response to this comment.
ECOSLO-2	The comment expresses concern regarding the significant and unavoidable impacts identified for the removal of oak trees, coast live oak forest, coast live oak woodland, Burton Mesa chaparral, air quality, greenhouse gas emissions, land use, population and housing, transportation, and growth inducement. These impacts are identified in the EIR. No changes to the environmental document are necessary in response to this comment.
ECOSLO-3	The comment states that ECOSLO understands the importance of increased housing supply but believes this project does not meet the principles of responsible development and suggests support for the Environmentally Superior Alternative (Alternative 3). No changes to the environmental document are necessary in response to this comment.
ECOSLO-4	The comment asserts that residents of San Luis Obispo County should not have to choose between increasing suburban sprawl and affordable housing. Ultimately, it will be the decision of the lead agency's decision-making body whether or not to reject or approve the proposed project or an alternative. No changes to the environmental document are necessary in response to this comment.

9.3.13 Northern Chumash Tribal Council



Northern Chumash Tribal Council

A Native American Corporation
PO Box 6533, CA 93412 (805) 356-6149



County of San Luis Obispo
Department of Planning and Building
ATTN: Dana Reserve/Jennifer Guetschow
976 Osos Street, Room 300
San Luis Obispo, CA 93408

RE: Dana Reserve Specific Plan Draft Environmental Impact Report

Dear Ms. Guetschow:

The Northern Chumash Tribal Council (NCTC; the Tribe) submits the following comments on the Cultural Resources and Tribal Cultural Resources sections of the Draft Environmental Impact Report (DEIR) for the Dana Reserve Specific Plan (the Project). In general, we find these sections of the DEIR are poorly written and demonstrate a general lack of familiarity with the local resources. Many of their conclusions and recommendations aren't substantiated with facts or reasonable assumptions based on facts. Moreover, the requirements of CEQA regarding the evaluation of California Register of Historic Places (CRHR) eligibility, impact assessment, and mitigation are skirted or ignored outright.

Section 4.5.1, Existing Conditions

The section does not demonstrate any understanding of the local history, prehistory, or archaeology which is the necessary context for the assessment of impacts on sites in the Project area. It completely ignores the Chumash history of Nipomo and lacks any discussion of local sites of importance to which the resources in the Project area may be related. The ethnographic overview even fails to mention the most relevant Chumash place in the region, *Nipumu*, the Northern Chumash village for which the current town of Nipomo is named. This is a substantial oversight that demonstrates the lack of knowledge regarding the study area. CA-SLO-809, the archaeological site associated with that village, is less than a mile away from the Project and should have been mentioned as the most substantial and well-known site in the area, even though it's beyond the arbitrary quarter-mile radius of the records search. The excavation at CA-SLO-809 is still the most substantial excavation in the local area; its findings provide the basis for the local prehistoric cultural sequence and should have been referenced in the overview section. Another omission has to do with the well-known discovery of a Clovis point in the hills surrounding the valley, substantiating the Late Paleoindian use of the area.

The Euro-American history of Nipomo is simply glossed over as well. There is no historical overview, even though the ranching history of the area is mentioned in passing and one historical archaeological site was identified in the project area. The Dana Rancho gets no mention anywhere, a considerable oversight since it provides critical historical context for the study area (and considering the Project name), even if the Adobe itself is more than 0.25 miles distant. In general, this section is poorly written, sloppy, and internally inconsistent. In addition to the omissions already noted, it also contains factual errors. For example, Mission San Fernando Rey is not in the Chumash territory, as stated on pages 4.5-2; it is in the Tataviam/Gabrielino area.

NCTC-1

NCTC-2

NCTC-3

NCTC-4

NCTC-5

NCTC-6

ENVIRONMENTAL & LAND-USE CONSULTING
EDUCATIONAL SERVICES TEACHING NATURE, NATIVE CULTURES & FARMING
NorthernChumash.org

Section 4.5.13, Existing Cultural Resources

The DEIR glosses over the history of the project area and writes off one site (P-40-002271) as insignificant because it is “undoubtedly historic” (pg 4.5.2-8) without providing evidence or explaining how they determined its age or reached this judgment regarding its significance. This information should be provided. Given the proximity of the Dana Adobe and the known historic uses of the area, this judgment should be reconsidered (or at least better supported).

NCTC-7

Since all these sites seem to contain marine shells that can be dated using radiocarbon, please explain why that wasn’t done. Such dating would have helped in evaluating the eligibility of these sites for the CRHR and assessing potential Project impacts.

NCTC-8

It does not appear that there has been any study of the proposed offsite conservation area/mitigation lands over in the hills on the other side of the valley. This area is part of the Project and should have been studied at the same level. In our experience, there are activities related to biological mitigation, water and range management, and other activities that could occur on these lands and would definitely impact any cultural resources present.

NCTC-9

Section 4.5.1.3.2, Native American Coordination

This section refers to a positive response from the Native American Heritage Commission (NAHC) but there was no effort to identify the nature or location of sacred lands in the Project area so they could be protected. The reader is referred to Section 4.18 for a description of tribal consultation, but that section doesn’t discuss sacred lands and the NAHC response was not disclosed to NCTC or other tribal consultants. We received no response to our additional inquiries to the County about this matter. For these and other reasons, consultation is not completed to our satisfaction. If there are identified sacred sites they have to be considered in the early planning stages so they can be respected and protected. The County should require an ethnohistoric study to identify sacred sites so Project impacts can be identified and mitigated.

NCTC-10

Section 4.5.4, Impact Assessment and Methodology

The County will assume that archaeological sites DR-001, P-40-2132, and P-40-2273 are eligible for the California Register for the purposes of the project, and are thus historical resources under CEQA, but the DEIR does not explain what qualities these sites have that would make them CRHR-eligible (Section 4.5.4, pp 4.5-16). Please provide this information. The DEIR avers that this assumption is based on the results of the Extended Phase 1 (XP1) investigation, but the XP1 study was only intended to define the vertical and horizontal extent of identified archaeological resources (i.e., the boundaries of the archaeological sites—see Morgan Bird’s 12-13-21 letter report to Senior Planner Jennifer Guetschow). The XP1 was helpful in defining the structure and content of the resources but does not constitute a significant evaluation, which is necessary at this point. This is a critical omission since it is

NCTC-11

NCTC-12

the Project's effects on those significant qualities of the sites that determine whether an impact is significant. How is the Tribe or the public judge the validity of the County's assumptions or the efficacy of the proposed mitigation without this critical missing information? Please explain why the cultural resources in the Project area were not evaluated for significance. This deficiency must be remedied in order to adequately determine the age of the cultural resources, identify their function(s), define the qualities that make the sites significant and justify recommendations regarding significance, avoidance, and other mitigation measures.

NCTC-12
(cont'd)

A letter to your department dated 12-13-21 from Cultural Resource Specialist Morgan Bird refers to a subsequent "comprehensive technical report." This report has not been supplied to the Tribe, and we request that it be provided now and that the comment period on the DEIR be extended for 30 days from our receipt of said document to allow us additional time for review and comment.

NCTC-13

Section 4.5.5, Project-Specific Impacts and Mitigation Measures

Mitigation measures (MM) CR/mm-1.1 and -3.1 delay environmental review of off-site improvements and defer identification of impacts and MMs to some future unspecified time. They declare that unidentified historical and archaeological resources could be impacted but that those impacts would be less than significant with mitigation. However, these mitigation measures only require preparation of reports and do not specify that resources shall be avoided, or other mitigation. It is improper and inconsistent with CEQA requirements to rely on a future plan or report without additional public review as mitigation now. It is not necessary to know the "precise location" of the offsite improvements. A general area for these potential effects should be identified now, and the architectural/historical/archaeological studies should be completed and reported in the EIR so that design changes can be implemented to avoid any significant resources.

NCTC-14

Please clarify whether the known archaeological sites shall be avoided or not? The EIR uses squishy language. CR/mm-2.1 says the parts of the sites found to contain subsurface deposits "shall be avoided." But then CR/mm-2.2 says, essentially, "oh that's okay, if we can't we'll do data recovery." Which is it, who decides, and when, and what are the circumstances that would preclude avoidance? None of this is specified, as it must be.

NCTC-15

Since data recovery through excavation is not the only feasible mitigation for the impacts of this Project, the EIR must explain why avoidance and preservation in place are not feasible or why other measures better mitigate the impacts.

NCTC-16

The DEIR notes that subsurface archaeological deposits exist in some small areas, and those areas are "potentially significant." These small areas where they identified subsurface layers are to be protected as ESAs, but the areas are not specified and we're not told where we can find that information, even if it's confidential and controlled. The Tribe requests detailed maps showing the locations of all proposed ESAs, and further requests that the comment period of the DEIR be extended for 30 days following receipt of those maps to allow sufficient time for review and comment.

NCTC-17

The argument that surface deposits without identified subsurface components are not eligible for the CRHR is based on a highly contingent set of assumptions that are not specified in the DEIR and requires substantiation, which might well have been obtained if a realistic program of site testing and evaluation had been carried out. Without meaningful testing results, however, such a conclusion is not justified. For example, a sparse surface deposit that is 8-10,000 years old might well be judged significant, while a similar deposit of only 500 years might not. Since we know that sites of Clovis age (as much as 12,000 years old) exist in the Nipomo area, it is premature to disregard these sparse surface deposits.

NCTC-18

Regarding CR/mm-2.2, what does it mean to say “The Data Recovery Plan will be tailored to the level of physical disturbance at each resource (if any)”? First of all, if there’s no physical disturbance why do data recovery? But more importantly, data recovery should be tailored to the significant qualities of the sites and the amount of data needed to answer the questions in the research design. It has nothing to do with the extent of disturbance. If the intent is to have specific measures for the amount of hand excavation, linked somehow to the amount of site disturbance, then that must be specified in the DEIR in some concrete way (either volume of excavation, or percentage of the site, or a ratio of the volume of site disturbance, or some other concrete measure) so the Tribe has an opportunity to review and comment. Such decisions cannot be deferred to some unspecified future time.

NCTC-19

When data recovery is the only feasible mitigation, a data recovery plan “shall be prepared and adopted prior to any excavation being undertaken.” There are specific requirements for data recovery plans. Even though the CEQA Guidelines allow for certain details of a mitigation measure to be specified project approval when it is impractical or infeasible to include those details during the project's environmental review, it seems perfectly feasible and practical to include the data recovery plan as an appendix to the DEIR in this case. Moreover, it will be impossible to gauge the adequacy of the measure, whether it is proportional to the impacts, and whether there are any residual impacts without knowing the details of the plan.

NCTC-20

MM CR/mm-2.3 calls for a Cultural Resource Protection Plan which may or may not include some level of tribal and archaeological monitoring. The language is unclear. Given the nature of archaeological resources on the Nipomo Mesa there is a high likelihood that sites will be discovered during construction. For that reason, tribal and archaeological monitoring of all ground disturbance should be required as a specific mitigation measure, and not just in the vicinity of known sites. The DEIR should provide details regarding the extent of monitoring required, when it shall occur, by whom, and under what conditions; such details are all omitted. These critical details cannot be deferred to some later, unspecified time. Again, the Tribes and public then have no way of judging the adequacy of the monitoring effort to mitigate impacts.

NCTC-21

Along these same lines, there is no explanation of just what should happen when previously unidentified sites are discovered, or when unanticipated artifacts and features are found in the known sites. Please include this information in the DEIR. Definition of these mitigation details cannot be deferred; they must be included as specific measures in the EIR.

NCTC-22

Regarding CR Impacts 4 and 5, any impacts to human remains would be significant and cannot be mitigated to less than significant levels by simply following state and law and local policy, as proposed in CR Impact 4. Simply following the law is not mitigation. We can see where you want to go with this—yank out the bodies and move on—but that’s not explicitly stated as a MM. The text (page 4.5-22) states “The NAHC would determine a Most Likely Descendant (MLD) to complete an inspection of the site within 48 hours of notification and recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials.” Is removal and analysis the only option? How do you know that’s what the MLD will recommend? Leaving our ancestors’ remains in place is always the preferred option, and there are many ways to accomplish that, but it is not mentioned as an alternative. Moreover, the MM does not even mention reburial if the individuals are moved!! One could assume that’s what the author thinks would happen, but where would that occur? Removing and reburying human remains does not mitigate impacts to less than significant levels. This would be a Class I (significant unmitigable) impact. What about leaving them in place? Redesign to avoid? Not even considered! This section is completely inadequate.

NCTC-23

The Tribe considers the cumulative impacts of this Project to be substantial, and that the proposed MMs are not adequate to mitigate those impacts. We request that the County require a specific MM that more comprehensively considers the broader cultural geography of the Nipomo Mesa and surrounding area, specifically geared to the cumulative impacts on cultural values and regional research.

NCTC-24

Regarding tribal consultation and tribal cultural resources (Section 4.18), NCTC maintains that AB52 consultation has not been completed. We have had ongoing discussions with the County and developers’ representatives that have not been concluded and need to continue.

NCTC-25

TCR/mm-1.1 calls for the construction of a repatriation vault within site DR-001. This mitigation will have a significant residual impact on the site which is not addressed. Section 4.5 calls for avoidance of the site, so these measures are inconsistent and conflicting.

NCTC-26

TCR/mm-1.2 calls for the incorporation of tribal themes and placenames into the project design, but provides no performance standards and designates no party responsible for ensuring the measure is carried out. This must be remedied.

NCTC-27

We reiterate our mission to protect the natural and cultural resources of the Project area and to utilize this site for the interpretative benefit of the public. We extend an invitation for further collaboration with the County and public agencies to assist the Project in the development of educational opportunities at the site.

Sincerely,

Violet Sage Walker,
Northern Chumash Tribal Council Chairwoman

9.3.13.1 Response to Letter from Northern Chumash Tribal Council

Comment No.	Response
NCTC-1	<p>The comment states Section 4.5.1, <i>Existing Conditions</i>, does not demonstrate any understanding of the local history, prehistory, or archaeology and states that it also ignores the Chumash history of Nipomo and lacks any discussion of local sites of importance to which the resources in the project area may be related, including the most relevant Chumash place in the region, <i>Nipumu</i>, the Northern Chumash village for which the current town of Nipomo is named.</p> <p>The Existing Conditions section in Section 4.5, <i>Cultural Resources</i>, is commensurate with the types of resources identified in the project area. The confidential technical report prepared for the project contains an expanded discussion of the prehistory, history, and ethnography of the area. The omission of a reference to <i>Nipumu</i> has been revised in Section 4.5.1, <i>Existing Conditions</i>, in the Final EIR.</p>
NCTC-2	<p>The comment states that CA-SLO-809, the archaeological site associated with <i>Nipumu</i> is less than a mile away from the project and should have been mentioned as the most substantial and well-known site in the area even though it is beyond the search radius.</p> <p>The Existing Conditions section in Section 4.5, <i>Cultural Resources</i>, is commensurate with the types of resources identified in the project area. The confidential technical report prepared for the project contains an expanded discussion of the prehistory, history, and ethnography of the area. Section 4.5, <i>Cultural Resources</i>, has been revised to reference <i>Nipumu's</i> influence.</p>
NCTC-3	<p>The comment states Section 4.5.1, <i>Existing Conditions</i>, does not include information about the well-known discovery of a Clovis point in the hills surrounding the valley, substantiating the Late Paleoindian use of the area.</p> <p>The Existing Conditions section in Section 4.5, <i>Cultural Resources</i>, is commensurate with the types of resources identified in the project area. The confidential technical report prepared for the project contains an expanded discussion of the prehistory, history, and ethnography of the area. Section 4.5, <i>Cultural Resources</i>, has been revised to include additional information regarding Mills et al. 2005.</p>
NCTC-4	<p>The comment states Section 4.5.1, <i>Existing Conditions</i>, does not include an overview of the Euro-American history of Nipomo. The confidential technical report prepared for the project contains an expanded history discussion. Given the lack of significant historic resources (archaeological or built environment), the section's discussion is commensurate with the findings. There are no documented land uses for the subject parcel to suggest that it ever played a distinctive role in the evolution of Rancho Nipomo. The parcel's acreage appears to have remained unsubdivided from 1878 through the present day. No changes in the environmental document are necessary in response to this comment.</p>
NCTC-5	<p>The confidential technical report contains an expanded history discussion. Given the lack of significant historic resources (archaeological or built environment), the section's discussion is commensurate with the findings. There are no documented land uses for the subject parcel to suggest that it ever played a distinctive role in the evolution of Rancho Nipomo. The parcel's acreage appears to have remained unsubdivided from 1878 through the present day. No changes in the environmental document are necessary in response to this comment.</p>
NCTC-6	<p>The comment states Mission San Fernando Rey is not in the Chumash territory. The mention of Mission San Fernando Rey is not in reference to the Chumash, it is a reference to an example of a mission (like Santa Barbara) where small ranchos granted to neophytes of these missions. No changes in the environmental document are necessary in response to this comment.</p>
NCTC-7	<p>The comment states that Section 4.5.13 glosses over the history of the project area and writes off one site (P-040-002271) as insignificant because it is "undoubtedly historic" without providing evidence.</p> <p>There are no documented land uses for the subject parcel to suggest that site P-040-002271 ever played a distinctive role in the evolution of Rancho Nipomo. P-040-002271 was not relocated. Its original documentation notes all identified Pismo clam fragments were from "legal" sized specimens, which indicates the resource is historic and not the result of prehistoric (or later) Native American harvesting and processing. No changes in the environmental document are necessary in response to this comment.</p>
NCTC-8	<p>The comment states that since all of the sites seem to contain marine shells that can be dated using radiocarbon, it would have helped in evaluating the eligibility of the sites for the CRHR and assessing potential project impacts.</p> <p>No collection was conducted as part of the Extended Phase I excavations or the pedestrian survey. Resources were presumed to be significant and mitigation has been identified to minimize impacts accordingly. No changes in the environmental document are necessary in response to this comment.</p>

Comment No.	Response
NCTC-9	<p>The comment states it does not appear that there has been any study of the proposed offsite conservation area/mitigation lands.</p> <p>No actions, change in use, or improvements are proposed for the offsite mitigation area. No changes in the environmental document are necessary in response to this comment.</p>
NCTC-10	<p>The comment states that Section 4.5.1.3.2, <i>Native American Coordination</i>, refers to a response from the Native American Heritage Commission (NAHC) but did not identify the nature or location of sacred lands in the project area so they could be protected. The comment also states the Northern Chumash Tribal Council did not receive a response to their inquiries to the County about this matter and, therefore, does not consider consultation complete and states the County should require an ethnohistoric study to identify sacred sites so project impacts can be identified and mitigated.</p> <p>The NAHC does not provide information regarding “positive” findings of the Sacred Lands File search. Their search parameters are based on the larger region and are not limited to the immediate project area. The NAHC provides a list of tribal contacts that may have information regarding tribal resources. The County conducted consultation, as per its obligations under Assembly Bill 52 to identify any such resources present in the project area. No changes in the environmental document are necessary in response to this comment.</p>
NCTC-11	<p>The comment states that the DEIR does not explain what qualities archaeological sites SR-001, P-40-2131, and P-40-2273 have that would make them CRHR-eligible.</p> <p>As stated in Section 4.5, <i>Cultural Resources</i>: “Based on the results of the XPI, the County is assuming for the purposes of this project that DR-001, P-40-002132, and P-40-2273 are CRHR-eligible under Criterion D (<i>Has yielded, or may be likely to yield, information important in prehistory or history</i>).” The XPI identified artifacts and ecofacts in sufficient quantities and in undisturbed contexts to consider the resources to contain important information. No changes in the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration.</p>
NCTC-12	<p>The comment states the Extended Phase I (XPI) investigation does not constitute a significant evaluation, which is necessary and suggests that the cultural resources in the project area were not evaluated for significance.</p> <p>For the purposes of the project, the County as the lead CEQA agency can make an assumption of eligibility and if the resources cannot be avoided then they will require mitigation to reduce the level of significance or the impact would be considered significant. No changes in the environmental document are necessary in response to this comment.</p>
NCTC-13	<p>The comment refers to a letter dated 12-13-21 from Cultural Resource Specialist Morgan Bird that refers to a subsequent comprehensive technical report. The comment requests that the subsequent technical report be provided to the Northern Chumash Tribal Council and that the comment period on the DEIR be extended for 30 days from receipt of the document to allow additional time for review and comment.</p> <p>The report was provided to tribes through ongoing tribal consultation and substantiated the information in the EIR. The EIR was circulated per the requirements of state law. No changes in the environmental document are necessary in response to this comment.</p>
NCTC-14	<p>The comment states that Mitigation Measures CR/mm-1.1 and -3.1 delay environmental review of off-site improvements and defer identification of impacts and mitigation measures to some future unspecified time. Offsite improvements were analyzed at a programmatic level and are located in predominantly heavily disturbed areas (roadways or roadside shoulders). Mitigation Measure CR/mm-3.1 requires review of all future off-site improvements by a qualified archaeologist; these reviews would be undertaken once off-site improvements are designed and the approximate location and area of disturbance is known. Mitigation criteria for avoiding and minimizing impacts to archaeological resources is well established and are detailed in CR/mm-3.1. Therefore, no changes in the environmental document are necessary in response to this comment.</p>
NCTC-15	<p>The comment asks whether the known archaeological sites will be avoided or not. The project has been designed to avoid one of two sites within the Specific Plan Area. Since future development within the Specific Plan Area has not been designed, it is uncertain whether portions of the other site can be avoided or to what degree. Therefore, Mitigation Measure CR/mm-2.2 has been included to require preparation of a Data Recovery Plan by a County-approved qualified archaeologist. The plan would require resource-specific data recover prior to initial site preparation and infrastructure establishment, as well as prior to all future phases of the project occurring within 50 feet of an Environmentally Sensitive Area. The Data Recovery Plan would be tailored to the level of physical disturbance at each resource (if any). As the full extent of proposed disturbance cannot be determined at this time, it is not practical to include the preparation of the Data Recovery Plan as part of this Environmental Impact Report. The Data Recovery Plan would be prepared in direct coordination with local tribal groups and submitted to the County of San Luis Obispo Planning and Building Department for review and approval. Additional specific performance standards and criteria of the Data Recovery Plan are detailed in Mitigation Measure CR/mm-2.2. No changes in the environmental document are necessary in response to this comment.</p>

Comment No.	Response
NCTC-16	<p>The comment states that since data recovery through excavation is not the only feasible mitigation for the impacts of this project, the EIR must explain why avoidance and preservation in place are not feasible or why other measures better mitigate the impacts.</p> <p>Please refer to response to comment NCTC-15.</p>
NCTC-17	<p>The comment requests detailed maps showing the locations of all proposed ESAs, and further requests that the comment period of the DEIR be extended for 30 days following receipt of those maps to allow sufficient time for review and comment.</p> <p>NCTC was provided this information during consultation. Please refer to response to comment NCTC-13.</p>
NCTC-18	<p>The comment states that the determination that surface deposits without identified subsurface components are not eligible for the CRHR is based on assumptions that are not specified in the DEIR.</p> <p>Of the approximately 180 shovel tests conducted in proximity of the resource to be potentially impacted, only small areas with subsurface components were identified in the project area and no diagnostic or datable materials were identified on the surface outside of the known site boundaries. These isolated materials have no information potential and are not datable. This clarification has been made to <i>Extended Phase I Results</i> under Section 4.5.1.3.4, <i>Extended Phase 1</i>.</p>
NCTC-19	<p>The comment asks for clarification regarding the sentence: "The Data Recovery Plan will be tailored to the level of physical disturbance at each resource (if any)."</p> <p>Data recovery will only occur in eligible resource areas that will be disturbed by the project so as not to unnecessarily disturb site areas that would otherwise be protected/undisturbed by project activities. No changes in the environmental document are necessary in response to this comment.</p>
NCTC-20	<p>The comment states that it would be feasible and practical to include the data recovery plan as an appendix to the DEIR at this time.</p> <p>Please refer to response to comment NCTC-15.</p>
NCTC-21	<p>The comment requests tribal and archaeological monitoring of all ground disturbance be required, not just in the vicinity of known sites. Mitigation Measure CR/mm-2.3 allows the County, in coordination with the tribe(s), and the archaeological consultant(s) to tailor the monitoring effort to the project, as those parties feel is appropriate given, for example, the nature/depth/location of construction activities, the level of sensitivity of a particular area or proximity to known resources, and the stage of construction activities (for example, monitoring during surficial contouring of an area that had already been mass graded to a maximum depth of disturbance would not be necessary). Mitigation Measure CR/mm-2.3 has been revised to include a requirement for tribal monitoring.</p>
NCTC-22	<p>The comment states there is no explanation of what should happen when previously unidentified sites are discovered, or when unanticipated artifacts and features are found in the known sites.</p> <p>As discussed in Section 4.5, <i>Cultural Resources</i>, based on the extent of future buildout and associated ground-disturbing activities, there is potential for inadvertent discovery of unknown cultural resource sites if present within the Specific Plan Area. Mitigation Measure CR/mm-2.3 has been identified to ensure protection of unknown cultural resources through implementation of avoidance and minimization measures in the event of inadvertent discovery. Further, Mitigation Measure CR/mm-2.4 has been identified to require worker awareness training to ensure construction workers and other project personnel are made aware of known cultural resources, the potential for inadvertent discovery of unknown cultural resources, and the proper protocol to be implemented if cultural resources are encountered during construction activities. Implementation of the identified mitigation measures would ensure avoidance and minimization of impacts to known and unknown cultural resource sites. No changes in the environmental document are necessary in response to this comment.</p>
NCTC-23	<p>The comment states that any impacts to human remains would be significant and cannot be mitigated to less-than-significant levels by simply following state and law and local policy as proposed in CR Impact 4.</p> <p>The language "...and recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials" has been removed from the section. Inadvertent discovery, including human remains will be subject to local and state law. California Health and Safety Code Section 7050.5 requires that in the event of an inadvertent discovery of human remains, work shall cease within the vicinity of the discovery, a qualified coroner shall identify human remains, and if the remains are identified to be of Native American descent, the NAHC shall be contacted. The NAHC will determine a Most Likely Descendant (MLD) to complete an inspection of the site within 48 hours of notification. Under this State law, the MLD will provide input on appropriate procedures for addressing human resources if encountered during project activities. Mitigation Measure CR/mm-2.3 includes the development of a project-specific protocol for inadvertent discovery and halt work scenarios and includes requirements for tribal coordination. Further, Mitigation Measure CR/mm-2.3 has been revised to outline requirements for tribal monitoring.</p>

Comment No.	Response
NCTC-24	<p>The comment states that the Tribe considers the cumulative impacts of the project to be substantial and that the proposed mitigation measures are not adequate to mitigate those impacts. The commenter requests that the County require specific mitigation measures that more comprehensively considers the broader cultural geography of the Nipomo Mesa and surrounding area, specifically geared to the cumulative impacts on cultural values and regional research.</p> <p>While there is a cumulative loss of archaeological resources occurring across the Nipomo Mesa and the County more broadly due to all current, past, and reasonably foreseeable projects that may impact cultural resources, the project's contribution to that loss is not cumulatively considerable. The project has been designed to avoid and protect as open space the most intact known resource. Impacts to the resource which cannot be avoided would be mitigated as described in responses to comments NCTC-1 through NCTC-23, above. With mitigation, impacts to known resources within the Dana Reserve Specific Plan Area would be reduced to less than significant and would not be cumulatively considerable. Therefore, no changes in the environmental document are necessary in response to this comment.</p>
NCTC-25	<p>The comment maintains that AB 52 consultation has not been completed. The County continued tribal consultation with NCTC throughout the EIR process, including meetings into the Spring of 2023. Per Public Resources Code Sections 21082.3 and 21080.3, tribal consultation ends when either (i) both parties agree to measures to avoid or mitigate a significant effect on a tribal cultural resource, or (ii) when a party, acting, in good faith and after reasonable effort, concludes that mutual agreement cannot be reached.</p> <p>The County met with NCTC on May 16, 2023 to further discuss the tribe's primary concerns: (1) protection of cultural resources to be impacts; (2) tribal housing; (3) concerns about tribal monitors; and (4) the need to incorporate additional detail into mitigation measures. The County explained its position on each of these issues to NCTC at this meeting; resolution of those issues is partially discussed in responses above. No changes to the EIR are required in response to this comment.</p>
NCTC-26	<p>The comment states that TCR/mm-1.1 will have a significant residual impact on the site which is not addressed.</p> <p>Mitigation Measure TCR/mm-1.1 has been revised to include information that specifies the vault will be placed in the site boundary but outside of areas known to contain subsurface deposits.</p>
NCTC-27	<p>The comment states that TCR/mm-1.2 calls for the incorporation of tribal themes and placenames into the project design, but provides no performance standards and designates no party responsible for ensuring the measure is carried out. Mitigation Measure TCR/mm-1.2 lists the design considerations that would be required and the MMRP (Chapter 7 of the EIR) identifies the County Planning and Building Department as the party responsible for verifying compliance with this measure. Therefore, no changes in the environmental document are necessary in response to this comment.</p>