

Appendices



Appendix FEIR-1

Draft SEIR Comment Letters



DEPARTMENT OF TRANSPORTATION

DISTRICT 7

100 S. MAIN STREET, MS 16

LOS ANGELES, CA 90012

PHONE (213) 269-1124

FAX (213) 897-1337

TTY 711

www.dot.ca.gov

*Making Conservation
a California Way of Life*

February 13, 2025

Jodie Sackett
Subdivisions
Los Angeles County
Department of Regional Planning
320 W. Temple Street, Fl. 13
Los Angeles, CA 90012

RE: Entrada South and Valencia Commerce
Center Project
SCH # 2000011025
Vic. LA-05/PM R53.48, LA-126/PM R4.88
GTS # LA-2021-04715-DSEIR

Dear Jodie Sackett:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced environmental document. The Entrada South and Valencia Commerce Center Planning Areas facilitated by the approved RMDP/SCP and analyzed in the State-certified EIR. Proposed development within the Entrada South Planning Area represents a reduction of 151 residential units and an increase of 280,000 square feet of commercial floor area as compared to the 2017 Project. The updated Entrada South Project includes 1,574 dwelling units (including affordable housing units consistent with the County's Inclusionary Housing Ordinance), 730,000 square feet of non-residential development, a neighborhood park and potential school site, a spineflower preserve, trails, roadways, and infrastructure.

The Valencia Commerce Center Planning Area (Vesting Tentative Parcel Map 18108) consists of approximately 321 acres in an undeveloped portion of the partially completed VCC industrial/business park center located west of I-5 and north of Henry Mayo Drive (SR-126). The Project Site is located within the planning boundary of the State-approved RMDP/SCP. The VCC Project provides for continued implementation of the development facilitated by the approved RMDP/SCP within the VCC Planning Area. The VCC Project includes approximately 3.4 million square feet of industrial/business park space, a multi-purpose trail, roadways, and infrastructure.

Pedestrian and Bicycle Access

We acknowledge that “in the immediate vicinity of the Entrada South Planning Area, Magic Mountain Parkway and The Old Road are fully improved with sidewalks on each side of the roadway. The intersection of The Old Road at Magic Mountain Parkway is also fully improved with sidewalks on all four corners and pedestrian crosswalks controlled by a traffic signal on all four legs”. We also acknowledge that “Near the VCC Planning Area, sidewalks are provided along the west side of both Commerce Center Drive and The Old Road. Pedestrian crosswalks controlled by a traffic signal are provided at the Commerce Center Drive/Hancock Parkway, Commerce Center Drive/Franklin Parkway, and Commerce Center Drive/Harrison Parkway intersections on some but not all legs”. These improvements are creating a pedestrian-friendly environment for the project.

Bicycle

Within Entrada South, the proposed trail system includes community trails, bike lanes, Neighborhood Electric Vehicle (NEV) paths, and recreational trails that would be linked to Newhall Ranch trail system and existing community of Westridge. The Modified Project would expand bicycle facilities in the area. The NEV pathways in Entrada South also serve as bike route. In VCC, a Class I bike route/pedestrian trail would be developed along the south/east bank of Castaic Creek adjacent to the Hancock Parkway Extension. We acknowledge that “The bicycle route improvements in and around the Modified Project Site would connect to an extensive system of continuous bike lanes within Mission Village and other communities to the west, future planned bike lanes along The Old Road to the east, and existing bike routes within the City of Santa Clarita”.

Transit

Santa Clarita Transit (SCT) currently operates six fixed route transit bus lines in the proximity of the Modified Project Site. The routes include numbers 1, 2, 3, 7, 502, and 636. Trail and bike path connect bus stops to mobility hub within Mission Village. We concur that “the Long-range plans include a potential Metrolink extension along the SR-126 corridor and land within Newhall Ranch is set aside of rail right-of-way and a park-and-ride and/or train station. With respect to the Modified Project, Santa Clarita Transit plans to extend existing bus routes into the development area, thereby connecting the Entrada Planning Area to major transit centers such as the Santa Clarita or Newhall Metrolink Stations”. These transit improvements demonstrate the project’s efforts to integrate with the regional transit network, enhance multimodal connectivity and promote sustainable transportation.

VMT

The Modified Project would not generate more than 110 trips per day in comparison to the 2017 Project as analyzed in the State-certified EIR. The VMT significance threshold for the Modified Project was derived based on the County VMT Guidelines target of VMT per service population being 16.8 percent below the baseline VMT. The resulting threshold of significance is 16.6 VMT per service population.

Reference to page 5.9-71 of the Draft SEIR, Table 5.9-10 VMT Summary with and Without Mitigation, the project would result in a combined total VMT of 18.2 per capita, exceeding the County's significance threshold of 16.6 VMT in which the County VMT Guidelines require a 16.8% reduction from the baseline VMT of 19.9. Residential and employment VMT without mitigation are projected at 10.6 and 21.1, respectively. However, with the implementation of a comprehensive Transportation Demand Management (TDM) Plan, including pedestrian and bicycle infrastructure, improved transit access, carpooling programs, and telecommuting incentives, the combined VMT is reduced to 15.5 per capita. This reduction meets with CEQA guidelines and results in a less-than-significant impact.

Roadway Improvements

The proposed state facility on/off-ramp improvements at key interchanges, including I-5 and SR-126, involve extended turn lanes, ramp widening, and additional roadway capacity to accommodate future traffic volumes. For example, the northbound turn lane at The Old Road and Turnberry Lane will be extended by approximately 51 feet to improve operational efficiency. Similarly, the westbound turn lane at Magic Mountain Parkway will be extended by 21 feet. Ensuring these improvements comply with Caltrans encroachment permit requirements, including detailed traffic control plans and emergency access provisions during construction, will be critical. While these upgrades are necessary to mitigate potential congestion, the project's analysis indicates that they will not result in significant impacts under CEQA if constructed as planned. Instead, these improvements will help manage traffic flow and ensure safety for all users.

B&T District-Fair Share Contribution

The Westside Bridge and Major Thoroughfare District (B&T District) was established by Los Angeles County in 2011 to equitably distribute the costs of roadway mitigation improvements among new developments in the Santa Clarita Valley. The district funds major infrastructure projects, including the construction of new roadways like Magic Mountain Parkway and Long Canyon Road, the Commerce Center Drive Bridge over the Santa Clara River, and various intersection and freeway interchange improvements. Developers within the district are required to contribute through an impact fee, which was \$28,390 per factored dwelling unit (FDU) as of July 1, 2022, with annual adjustments. Given that the proposed project falls within this district, the developer is responsible for paying their fair share of these fees to support necessary transportation infrastructure improvements. Coordination with Los Angeles County is required to ensure compliance with this funding obligation. Please update Caltrans to confirm that the developer is in compliance with B&T District funding requirements.

Additional TDM for Consideration

We encourage the Lead Agency to evaluate the potential of Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications in order to better manage the transportation network, as well as transit service and bicycle or pedestrian connectivity improvements. For additional TDM options, please refer to the

Federal Highway Administration's *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8). This reference is available online at:

<http://ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf>

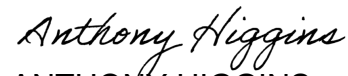
Other Comments

Please be reminded that any work performed within the State Right-of-way will require an Encroachment Permit from Caltrans. Any modifications to State facilities must meet all mandatory design standard and specifications.

As a reminder, any transportation of heavy construction equipment and/or materials which require use of oversized transport vehicles on State highways will need a Caltrans transportation permit. We recommend large-size truck trips be limited to off-peak commute periods. Truck drivers should cover construction trucks with tarpaulin to avoid debris spillage onto the State Highway.

Please feel free to contact Mr. Alan Lin the project coordinator at (213) 269-1124 and refer to GTS # LA-2021-04715-DSEIR.

Sincerely,



ANTHONY HIGGINS
Acting LDR Branch Chief

Cc: State Clearinghouse



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



February 14, 2025

Jodie Sackett
Los Angeles Department of Regional Planning
320 West Temple Street, Floor 1362
Los Angeles, CA 90012-3208

Subject: Draft Supplemental Environmental Impact Report for the Entrada South and Valencia Commerce Center Project, SCH No. 2000011025, Los Angeles, CA

Dear Jodie Sackett:

The California Department of Fish and Wildlife (CDFW) reviewed the Draft Supplemental Environmental Impact Report (SEIR) from the Los Angeles County Department of Regional Planning (LADRP) for the Entrada South and Valencia Commerce Center Project (Project) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines¹.

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, CDFW appreciates the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Fish & G. Code, § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

¹ CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

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CDFW may also act as a Responsible Agency under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 et seq.). Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law² of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.) or the Native Plant Protection Act (NPPA; Fish & G. Code, §1900 et seq.), the Project proponent may seek related take authorization as provided by the Fish and Game Code.

PROJECT DESCRIPTION SUMMARY

Proponent: Los Angeles County Department of Regional Planning (LADRP)

Objective: The Project is a large-scale mixed-use development within unincorporated Los Angeles County. The Project Site is located within the planning boundary of the Newhall Ranch Resource Management and Development Plan/Spineflower Conservation Plan approved by CDFW, the subject of an EIR and Additional Environmental Analysis certified by CDFW in 2017 (CDFW 2017a). The Project spans approximately 382.3 acres in the Entrada South Planning Area and 328.5 acres in the Valencia Commerce Center (VCC) Planning Area, totaling 710.8 acres of development area. Within the Entrada South Planning Area, the Project includes 1,574 residential units consisting of single-family detached condominiums, townhomes, and multi-family units, including affordable housing. Additionally, 730,000 square feet of non-residential commercial and office space will be developed to support economic growth. The plan also includes 140.4 acres of open space, a 27.2-acre Spineflower Preserve, a 5.4-acre neighborhood park, a potential school site, and recreational centers totaling approximately 8,430 square feet. The VCC Planning Area would allow for 3.4 million square feet of industrial, business park, and office space development. The plan also includes 195.9 acres of open space, with significant portions dedicated to natural habitat conservation along Hasley Creek and Castaic Creek.

Location: The Project site is located within the northwest portion of Los Angeles County, west of Interstate 5 and the City of Santa Clarita. The Project site is located in an unincorporated area of Los Angeles County, within the Santa Clarita Valley Planning Area. The Project site is generally surrounded by the Santa Clara River, Los Padres and Angeles National Forests to the north, the Santa Susana Mountains to the south, Agua Dulce and the Angeles National Forest to the east, and the County of Ventura to the west.

² "Take" is defined in Section 86 of the Fish and Game Code as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill."

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Biological Setting: The biological significance of the Project site and adjacent areas stems from its diverse ecological features, including jurisdictional waters, riparian habitats, and habitat for several special-status species. The Entrada South and VCC Planning Areas support a range of sensitive biological resources, including jurisdictional streambeds such as Hasley Creek, Castaic Creek, and the unnamed drainages in Entrada South, which provide riparian corridors. Among the notable plant species present are the San Fernando Valley spineflower (*Chorizanthe parryi* var. *fernandina*), slender mariposa lily (*Calochortus clavatus* var. *gracilis*), white rabbit-tobacco (*Pseudognaphalium leucocephalum*), Peirson's morning-glory (*Calystegia peirsonii*), mainland cherry (*Prunus ilicifolia* ssp. *ilicifolia*), and Southern California black walnut (*Juglans californica*), along with various oak species (*Quercus* spp.). These plant species contribute to the biodiversity of the area, supporting critical habitats for wildlife. The Project site also provides habitat for numerous special-status wildlife species, including the California condor (*Gymnogyps californianus*), least Bell's vireo (*Vireo bellii pusillus*), southwestern willow flycatcher (*Empidonax traillii extimus*), and coastal California gnatcatcher (*Polioptila californica californica*), all of which are listed as endangered or threatened. Additionally, the area supports the tricolored blackbird (*Agelaius tricolor*), western pond turtle (*Actinemys marmorata*), and San Emigdio blue butterfly (*Plebejus emigdionis*), as well as several bat species, including the western mastiff bat (*Eumops perotis californicus*), western red bat (*Lasiurus blossevillii*), Yuma myotis (*Myotis yumanensis*), and pocketed free-tailed bat (*Nyctinomops femorosaccus*). Other notable species include the Crotch's bumble bee (*Bombus crotchii*), burrowing owl (*Athene cunicularia*), California glossy snake (*Arizona elegans occidentalis*), and the mountain lion (*Puma concolor*). Given the presence of these species, the Project incorporates mitigation measures aimed at minimizing ecological impacts, such as habitat conservation, restoration, and enhancement efforts.

In the Entrada South Planning Area, the Project will affect three unnamed drainages, with 1.12 acres of impacts in Unnamed Drainage 1, 8.78 acres in Unnamed Drainage 2, and 1.56 acres in Unnamed Drainage 3. This results in total impact of 11.66 acres of CDFW-jurisdictional streambed, an increase of 4.77 acres compared to the previous delineation from the 2017 EIR. In the VCC Planning Area, the Project will affect several key waterways. Castaic Creek will experience 7.08 acres of permanent impacts, slightly increasing from 6.90 acres in the 2017 Project. Hasley Creek will have a significant reduction in permanent impacts, down to 4.46 acres from the previously estimated 17.09 acres, though temporary impacts will increase to 7.86 acres due to channel stabilization and restoration efforts. The Project will also introduce 0.32 acres of permanent and 0.20 acres of temporary impacts to jurisdictional streambeds in the Live Oak Road Detention Basin. Additionally, the Old Road Agricultural Ditch, which was not previously classified as jurisdictional, will now experience 0.38 acres of permanent impacts.

Overall, the total streambed impact subject to Fish and Game Code 1600 *et seq.* in the VCC Planning Area amounts to 113.22 acres, temporary and permanent, reflecting an increase of 5.06 acres compared to prior assessments. While some areas will

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experience reduced permanent impacts, temporary impacts have increased due to the need to stabilize streambeds. To mitigate the effect of the Project, the Project incorporates revegetation efforts, stream channel stabilization measures, and conservation easements aimed at preserving long-term ecological functionality

Project History: The 2010 EIR (CDFW 2010) was originally certified by CDFW and made up of a Draft EIR circulated for public review in 2009, the Final EIR in June 2010, and an “Addendum/Additional Information” published in 2010, as well as all supporting documents. There was a legal challenge to the 2010 certification and in response, CDFW published a Draft Additional Environmental Analysis in November 2016. In 2017, CDFW found that the 2010 Final EIR and the 2017 AEA (CDFW 2017a) were in compliance with CEQA. CDFW has coordinated closely with Project proponent throughout the EIR and SEIR review process and will continue to coordinate with permitting needs.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist LADRP in adequately identifying and/or mitigating the Project’s significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources.

COMMENT # 1: Impacts to Western Burrowing Owls (*Athene cunicularia*)

Issue: The measures may not provide enough specificity to avoid or minimize direct and indirect impacts to a level of less than significant to western burrowing owl.

Specific impact: Potential western burrowing owl presence indicate that Project activities may result in direct and/or indirect western burrowing owl mortality or injury. Direct impacts to western burrowing owl could result from Project construction and activities such as equipment staging, mobilization, grading, ground disturbance; vegetation clearing, and trampling or crushing from construction equipment and foot traffic. In addition, without specific avoidance and minimization measures, Project impacts may contribute to statewide population declines for burrowing owl.

Why impact would occur: The current measures in the SEIR provide that “construction work can proceed after any owls have been evacuated from the site using CDFW-approved burrow closure procedures and after alternative nests have been provided in accordance with the CDFW Staff Report on Burrowing Owl Mitigation (10-17-95).” Because the western burrowing owl is a candidate species for listing, the measures should be updated to prevent significant impacts to the species. As described in CDFW’s Staff Report on Burrowing Owl Mitigation (CDFW 2012), excluding and/or evicting burrowing owls from their burrows is considered a potentially significant impact under CEQA.

Ground disturbance associated with Project implementation could cause direct and indirect consequences to burrowing owl. Without adequate and updated species-

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specific avoidance measures and survey protocols, detection and protection of western burrowing owl may be ineffective. If effective protection measures aren't implemented, Project activities may trap wildlife hiding under refugia or burrows, or flush wintering burrowing owls, subjecting them to predation or other harm.

On October 15, 2024, the Fish and Game Commission published a Notice of Findings that designates western burrowing owl as a CESA candidate species. Without updated focused surveys, this CESA candidate species may go undetected. Unintentional flushing of western burrowing owl distresses the owl and may lead to potential take of individual western burrowing owls. To avoid unauthorized take, LADRP should incorporate mitigation measures that prescribe focused surveys and protection measures. If take cannot be avoided, coordination with CDFW is recommended and obtaining appropriate take authorization should be considered.

Evidence impact may be significant: Western burrowing owl is a species designated as candidate for listing as threatened or endangered pursuant to CESA (Fish & G. Code, § 2050 *et seq.*). Take of any endangered, threatened, or candidate species that results from the Project is prohibited, except as authorized by State law (Fish & G. Code, §§ 86, 2062, 2067, 2068, 2080, 2085; Cal. Code Regs., tit. 14, § 786.9). Additionally, take of individual western burrowing owl and their nests is defined by Fish and Game Code section 86 and prohibited by sections 3503, 3503.5, and 3513. Take is defined in Fish and Game Code section 86 as "hunt, pursue, catch, capture or kill, or attempt to hunt, pursue, catch, capture or kill." Inadequate avoidance and mitigation measures will result in the Project continuing to have a substantial adverse direct and cumulative effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW.

Recommended Potentially Feasible Mitigation Measure(s)

Mitigation Measure #1: CDFW recommends LADRP replace mitigation measure RMDP/SCP-BIO-57 with the following measure:

Prior to Project activities, and within 120 days of Project commencement, focused surveys by a CDFW-approved qualified biologist, shall be conducted to determine presence of western burrowing owl. Surveys shall include four site visits conducted from as many fixed points as necessary to provide visual coverage of the site using spotting scopes or binoculars. Disturbance shall be minimized around potential occupied burrows during all seasons. Site visits shall be repeated on four separate days. Visits shall be conducted two hours before to one hour after sunset, or from one hour before to two hours after sunrise. Surveys shall be conducted during weather that is conducive to observing owls outside their burrows. Surveys shall be avoided during heavy rain, high winds (> 20 mph), or dense fog.

Results of all surveys shall be provided to CDFW after surveys are complete, 30 days prior to Project commencement. If a burrowing owl is observed during the focused

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surveys, the qualified biologist shall notify CDFW immediately and prepare a Burrowing Owl Plan that shall be submitted to CDFW for review and approval 30 days prior to commencing Project activities. The Burrowing Owl Plan shall describe survey results, proposed avoidance measures, and monitoring plan.

Recommendation #1: Incidental Take Permit – If there is a potential for take as defined by Fish and Game Code section 86, Permittee should consult with CDFW and consider obtaining an Incidental Take Permit to comply with the California Endangered Species Act (Fish & Game Code, § 2080 et seq).

COMMENT # 2: Impacts to Crotch's bumble bee (*Bombus crotchii*)

Issue: The avoidance and minimization measures may not provide enough specificity to avoid or minimize direct and indirect impacts to a level of less than significant Crotch's bumble bee.

Specific impact: Crotch's bumble bee presence indicate that Project activities may result in direct and/or indirect Crotch's bumble bee mortality or injury. Direct impacts to Crotch's bumble bee could result from Project construction and activities including, but not limited to, ground disturbance, vegetation clearing, and trampling or crushing from construction equipment, vehicles, and foot traffic. Although measures to avoid impacts to Crotch's bumble bee were included in the SEIR, the measures do not offer enough protections to provide less than significant impacts.

Why impact would occur: According to the SEIR, 14 Crotch's bumble bee were present at Entrada South and 2 Crotch's bumble bee at Valencia Commerce Center (with one additional incidental sighting during unrelated surveys), therefore both Project areas are have presence of Crotch' bumble bee. During the surveys completed in 2024, no nests were found. Bumble bees move nests sites each year; therefore, surveys should be conducted each year that project activities will occur. Even if surveys from a particular project site failed to detect bumble bees one year, project proponents should perform a full round of surveys each year that project activities will occur or assume presence (CDFW 2023). Although there is little data describing the nesting of candidate bumble bee species, they may utilize similar nesting habitats as other *Bombus* species (Williams et al. 2014). Bumble bee queens from the *Bombus* subgenus do not dig or make their own nests, rather they search for suitable nest sites by flying low to the ground investigating cavities in a variety of different substrates including thatched grasses, abandoned rodent burrows or bird nests, brush piles, rock piles, and fallen logs (Sladen 1912, Free and Colin Gasking Butler 1959, Alford 1975, Fussell and Corbet 1992, Lye et al. 2012, Williams et al. 2014). As bumble bee may nest in thatched grasses, brush piles or fallen rocks, Project activities that may remove vegetation are considered Project activities that could significantly impact bumble bees and related measures should provide adequate protection.

Without appropriate avoidance and minimization measures for Crotch's bumble bee and their habitat, Project-related activities involving ground and vegetation disturbance could

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result in potential significant impacts, including loss of foraging resources, changes in foraging behavior, burrow collapse, nest abandonment, reduced nest success, reduced health and vigor of eggs, young, and/or queens, and direct mortality. The Project activities, if not addressed, may cause death or injury of adults, eggs, and larva as well as cause burrow collapse, entombment, nest abandonment, and reduced nest success. Project impacts may contribute to statewide population declines for Crotch's bumble bee.

Evidence impact would be significant: A petition to list the Crotch's bumble bee, an endangered species under CESA, is currently pending before the California Fish and Game Commission (Commission) (Cal. Reg. Notice Register 2018, No. 45-Z, pp. 1986–1987 [November 9, 2018]). The Commission designated the Crotch's bumble bee as a candidate species under CESA in June 2019 (Cal. Reg. Notice Register 2019, No. 26-Z, pp. 954–955 [June 28, 2019]). The Commission's decision to designate the Crotch's bumble bee as a candidate species is the subject of a pending legal challenge (Almond Alliance of California v. Fish and Game Commission [2022] 79 Cal. App. 5th 337, pet. for review pending, S275412). On September 30th, 2022, candidacy was reinstated for the four bumble bee species petitioned for listing: Franklin's, Crotch's, western, and suckley cuckoo.

Crotch's bumble bee is also listed as an invertebrate of conservation priority under the [California Terrestrial and Vernal Pool Invertebrates of Conservation Priority](#) (CDFW 2017b). Crotch's bumble bee has a State ranking of S1/S2. This means that the Crotch's bumble bee is considered critically imperiled or imperiled and is extremely rare (often 5 or fewer populations). Also, Crotch's bumble bee has a very restricted range and steep population declines make the species vulnerable to extirpation from the State (CDFW 2017b). Accordingly, Crotch's bumble bee meets the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15380). Therefore, take of Crotch's bumble bee could require a mandatory finding of significance by LACPW (CEQA Guidelines, § 15065).

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #2: CDFW recommends LADRP revise the following mitigation measure, ES/VCC-MM-BIO-2, by removing the language in strikethrough and adding the underlined language:

~~Should Project ground-disturbing activities be scheduled to occur during the Crotch bumble bee colony active period, a qualified biologist shall conduct a habitat assessment to identify areas containing suitable habitat for Crotch bumble bee. The qualified biologist shall conduct pre-construction surveys for Crotch bumble bee in the areas identified, using a methodology (including number and timing of surveys) accepted by the California Department of Fish and Wildlife (CDFW).~~

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~~If Crotch bumble bee are not detected, no further measures are required. A qualified biologist shall be present during ground-disturbing Project activities that occur during the Crotch bumble bee colony active period.~~

~~If Crotch bumble bee are detected:~~

Prior to the start of Project activities, during the Queen Flight and Colony Active Periods (February 1 through October 31), a qualified biologist shall conduct a habitat assessment to identify suitable habitat for Crotch's bumble bee within Project activity areas, and then survey prior to construction for Crotch's bumble bee and nests in those areas. Qualified biologist(s) shall be approved by CDFW 14 days prior to survey commencement. Survey protocols shall adhere to CDFW's [Survey Considerations for CESA Candidate Bumble Bee Species](#) (CDFW 2023) or another methodology approved by CDFW. Survey results, including negative findings or a map of nest location(s), shall be submitted to CDFW for review 14 days prior to starting Project activities. If Crotch's bumble bee nests are found during pre-construction surveys or detected during Project activities, Project activities shall be suspended until the CDFW-approved qualified biologist, with expertise in bumble bees, receives approval from CDFW for a Bumble Bee Avoidance Plan to avoid impacts to the nest(s). If Crotch's bumble bee nests are not found during the surveys (negative finding) then no further measures are required. A qualified biologist shall be present during initial ground disturbing Project activities (clearing and grubbing) in areas where suitable habitat was identified.

The plan shall include:

1. On-site daily monitoring by CDFW-approved biologist during Project activities, such as ground or vegetation disturbance.
2. No impact buffers. Ground-disturbing activities shall be prohibited within 100 feet of any known occupied Crotch's bumble bee nest, or as determined by a qualified biologist through evaluation of topographic features or distribution of floral resources. If Project activities may result in disturbance or potential take, the qualified biologist, in coordination with CDFW, should expand the buffer zone as necessary to prevent disturbance or take. The prohibition will continue for the duration of the Crotch's bumble bee colony active period, unless the nest is determined to be inactive by a qualified biologist or is relocated or removed with CDFW authorization.
3. If a nest is found, Project proponent will provide a survey report to CDFW with a summary of the physical (e.g., soil, moisture, slope) and biological (e.g., plant composition) conditions where each nest/colony is found, within a 10-foot radius. This shall include native plant composition (e.g., density, cover, and abundance) within affected habitat (e.g., species list separated by vegetation class; density, cover, and abundance of each species).

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~~The Project proponent shall prepare a Crotch Bumble Bee Avoidance and Minimization Plan for review and approval by CDFW, which shall include additional, site-specific measures to avoid take of Crotch bumble bee during Project ground-disturbing activities during the colony active period.~~

4. If the Crotch's bumble bee remains a candidate for listing, or has been listed, as endangered or threatened under the California Endangered Species Act ("CESA"), and Project activities will cause "take" of Crotch's bumble bee, as that term is defined by ~~for purposes of the CESA~~ Fish and Game Code section 86, the Project proponent shall obtain authorization for such take pursuant to Fish and Game Code Section 2081 or any other applicable provision of law providing such authorization.

Additional Recommendations

Recommendation #2: WEAP Training Additions- CDFW recommends additional protections for wildlife be included in the Worker Environmental Awareness Program for both Entrada South and Valencia Commerce Center Project areas. Open pipes and similar construction materials present a significant entrapment hazard for wildlife. Wildlife seeking refuge may enter construction related materials and become trapped, leading to injury or death. CDFW requests the Project proponent revise measure RMDP/SCP-BIO-52 by adding the underlined language:

Prior to grading and construction activities, a qualified biologist shall be retained to conduct a Worker Environmental Awareness Program (WEAP) for all construction/contractor personnel. A list of construction personnel who have completed training prior to the start of construction shall be maintained on-site, and this list shall be updated as required when new personnel start work. No construction worker may work in the field for more than five days without participating in the WEAP. Night work and use of lights on equipment shall not be allowed unless CDFW approves of the night work and use of lights. Lighting shall not be used where threatened or endangered species occur. Lights shall be directed from natural areas and remain 200 feet away from natural areas unless otherwise approved by CDFW.

The qualified biologist shall provide ongoing guidance to construction personnel and contractors to ensure compliance with environmental/permit regulations and mitigation measures. The qualified biologist shall perform the following:

- Provide training materials and briefings to all personnel working on-site. The material shall include but not be limited to the identification and status of plant and wildlife species, significant natural plant community habitats (e.g., riparian), fire protection measures, and review of mitigation requirements.

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- A discussion of the federal and state Endangered Species Acts, Bald and Golden Eagle Protection Act, Migratory Bird Treaty Act, other state or federal permit requirements, and the legal consequences of non-compliance with these acts.
- Attend the pre-construction meeting to ensure that timing/location of construction activities do not conflict with other mitigation requirements (e.g., seasonal surveys for nesting birds, pre-construction surveys, or relocation efforts).
- Conduct meetings with the contractor and other key construction personnel describing the importance of restricting work to designated areas. Maps showing the location of special-status wildlife or populations of rare plants, exclusion areas, or other construction limitations (e.g., limitations on nighttime work) will be provided to the environmental monitors and construction crews prior to ground disturbance.
- Discuss procedures for minimizing harm to or harassment of wildlife encountered during construction and provide a contact person in the event of the discovery of dead or injured wildlife.
- Ensure that all pipes, tubing, or similar items staged or stored at the Project site for one or more overnight periods shall be capped, screened, covered, or filled with material. All pipes, tubing, or similar items shall be thoroughly inspected for wildlife by the qualified biologist or biological monitor, prior to capping or use in Project activities.
- Review/designate the construction area in the field with the contractor in accordance with the final grading plan.
- Ensure that haul roads, access roads, and on-site staging and storage areas are sited within grading areas to minimize degradation of vegetation communities adjacent to these areas (if activities outside these limits are necessary, they shall be evaluated by the biologist to ensure that no special-status species habitats will be affected).
- Conduct a field review of the staking (to be set by the surveyor) designating the limits of all construction activity.
- Flag or temporarily fence any construction activity areas immediately adjacent to riparian areas.
- Ensure and document that required pre-construction surveys and/or relocation efforts have been implemented prior to Project activities.

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Recommendation #3: Mitigation Ledger Verification. To properly document 316.4 acres of permanent impacts associated with at Entrada South and 189.8 acres of permanent impacts at Valencia Commerce Center, CDFW requests the Project proponent provide a ledger or some appropriate accounting measure documenting the mitigation acreage debit from High Country, Salt Creek, and River Corridor conservation areas prior to Project activities.

Mitigation and Monitoring Reporting Plan. CDFW recommends the Project's environmental document include mitigation measures recommended in this letter. CDFW has provided comments via a mitigation monitoring and reporting plan to assist in the development of feasible, specific, detailed (i.e., responsible party, timing, specific actions, location), and fully enforceable mitigation measures (CEQA Guidelines, § 15097; Pub. Resources Code, § 21081.6). The Lead Agency is welcome to coordinate with CDFW to further review and refine the Project's mitigation measures. Per Public Resources Code section 21081.6(a)(1), CDFW has provided a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation Monitoring and Reporting Plan (Attachment A).

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). The [CNDDDB website](https://wildlife.ca.gov/Data/CNDDDB)³ provides direction regarding the types of information that should be reported and allows on-line submittal of field survey forms.

In addition, information on special status native plant populations and sensitive natural communities, should be submitted to CDFW's Vegetation Classification and Mapping Program using the [Combined Rapid Assessment and Relevé Form](https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities/Submit)⁴.

LADRP should ensure data collected for the preparation of the Draft SIER is properly submitted.

FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is

³ <https://wildlife.ca.gov/Data/CNDDDB>

⁴ <https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities/Submit>

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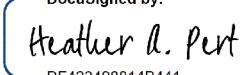
required in order for the underlying Project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

CONCLUSION

CDFW appreciates the opportunity to comment on the SEIR to assist LADRP in identifying and mitigating Project impacts on biological resources. CDFW requests an opportunity to review and comment on any response that LADRP has to our comments and to receive notification of any forthcoming hearing date(s) for the Project (CEQA Guidelines, § 15073(e)).

Questions regarding this letter or further coordination should be directed to [Kendall Hines](#)⁵, Senior Environmental Scientist (Specialist).

Sincerely,

DocuSigned by:

DF423498814B441...
Heather A. Pert
Environmental Program Manager
South Coast Region

ec: California Department of Fish and Wildlife
Heather Pert, Environmental Program Manager
Erika Cleugh, Senior Environmental Scientist (Supervisory)
Kendall Hines, Senior Environmental Scientist (Specialist)
Cindy Hailey, Staff Services Analyst

Office of Planning and Research
State.Clearinghouse@opr.ca.gov

ATTACHMENTS

Attachment A: Draft Mitigation, Monitoring, and Reporting Program

REFERENCES

Alford, D. V. 1975. Bumblebees. Davis-Poynter, London.

⁵ Phone: (858) 833-2815; Email: Kendall.Hines@wildlife.ca.gov

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Los Angeles Department of Regional Planning
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State of California – Natural Resources Agency
 DEPARTMENT OF FISH AND WILDLIFE
 South Coast Region
 3883 Ruffin Road
 San Diego, CA 92123
 (858) 467-4201
wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



ATTACHMENT A: DRAFT MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)

CDFW provides the following language to be incorporated into the MMRP for the Project.

Mitigation Measure	Timing	Responsible Party
Mitigation Measure #1: Impacts to Western Burrowing Owl (<i>Athene cunicularia</i>) Prior to Project activities, and within 120 days of Project commencement, focused surveys by a CDFW-approved qualified biologist, shall be conducted to determine presence of western burrowing owl. Surveys shall include four site visits conducted from as many fixed points as necessary to provide visual coverage of the site using spotting scopes or binoculars. Disturbance shall be minimized around potential occupied burrows during all seasons. Site visits shall be repeated on four separate days. Visits shall be conducted two hours before to one hour after sunset, or from one hour before to two hours after sunrise. Surveys shall be conducted during weather that is conducive to observing owls outside their burrows. Surveys shall be avoided during heavy rain, high winds (> 20 mph), or dense fog. Results of all surveys shall be provided to CDFW after surveys are complete, 30 days prior to Project commencement. If a burrowing owl is observed during the focused surveys, the qualified biologist shall notify CDFW immediately and prepare a Burrowing Owl Plan that shall be submitted to CDFW for review and approval 30 days prior to commencing Project activities. The Burrowing Owl Plan shall describe survey results, proposed avoidance measures, and monitoring plan.	Prior to Project ground disturbing activities	Project Proponent

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Mitigation Measure	Timing	Responsible Party
Mitigation Measure #2: Impacts to Crotch's Bumble Bee (<i>Bombus crotchii</i>) Prior to the start of Project activities, during the Queen Flight and Colony Active Periods (February 1 through October 31), a qualified biologist shall conduct a habitat assessment to identify suitable habitat for Crotch's bumble bee within Project activity areas, and then survey prior to construction for Crotch's bumble bee and nests in those areas. Qualified biologist(s) shall be approved by CDFW 14 days prior to survey commencement. Survey protocols shall adhere to CDFW's Survey Considerations for CESA Candidate Bumble Bee Species (CDFW 2023) or another methodology approved by CDFW. Survey results, including negative findings or a map of nest location(s), shall be submitted to CDFW for review 14 days prior to starting Project activities. If Crotch's bumble bee nests are found during pre-construction surveys or detected during Project activities, Project activities shall be suspended until the CDFW-approved qualified biologist, with expertise in bumble bees, receives approval from CDFW for a Bumble Bee Avoidance Plan to avoid impacts to the nest(s). If Crotch's bumble bee nests are not found during the surveys (negative finding) then no further measures are required. A qualified biologist shall be present during initial ground disturbing Project activities (clearing and grubbing) in areas where suitable habitat was identified. The plan shall include: 1. On-site daily monitoring by CDFW-approved biologist during Project activities, such as ground or vegetation disturbance 2. No impact buffers. Ground-disturbing activities shall be prohibited within 100 feet of any known, occupied Crotch's bumble bee nest, or	Prior to Project ground disturbing activities or vegetation removal	Project Proponent

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Mitigation Measure	Timing	Responsible Party
as determined by a qualified biologist through evaluation of topographic features or distribution of floral resources. If Project activities may result in disturbance or potential take, the qualified biologist, in coordination with CDFW, should expand the buffer zone as necessary to prevent disturbance or take. The prohibition will continue for the duration of the Crotch's bumble bee colony active period, unless the nest is determined to be inactive by a qualified biologist. 3. If a nest is found, Project proponent will provide a survey report to CDFW with a summary of the physical (e.g., soil, moisture, slope) and biological (e.g., plant composition) conditions where each nest/colony is found, within a 10-foot radius. This shall include native plant composition (e.g., density, cover, and abundance) within affected habitat (e.g., species list separated by vegetation class; density, cover, and abundance of each species). 4. If the Crotch's bumble bee remains a candidate for listing, or has been listed, as endangered or threatened under the California Endangered Species Act ("CESA"), and Project activities will cause "take" of Crotch's bumble bee, as that term is defined by Fish and Game Code section 86, the Project proponent shall obtain authorization for such take pursuant to Fish and Game Code Section 2081 or any other applicable provision of law providing such authorization.		

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Mitigation Measure	Timing	Responsible Party
Recommendation #1: Incidental Take Permit If there is a potential for take as defined by Fish and Game Code section 86, Permittee should consult with CDFW and consider obtaining an Incidental Take Permit to comply with the California Endangered Species Act (Fish & Game Code, § 2080 et seq).	Prior to Project ground disturbing activities or vegetation removal	Project Proponent
Recommendation #2: WEAP Training Additions Prior to grading and construction activities, a qualified biologist shall be retained to conduct a Worker Environmental Awareness Program (WEAP) for all construction/contractor personnel. A list of construction personnel who have completed training prior to the start of construction shall be maintained on-site, and this list shall be updated as required when new personnel start work. No construction worker may work in the field for more than five days without participating in the WEAP. Night work and use of lights on equipment shall not be allowed unless CDFW approves of the night work and use of lights. Lighting shall not be used where threatened or endangered species occur. Lights shall be directed from natural areas and remain 200 feet away from natural areas unless otherwise approved by CDFW. The qualified biologist shall provide ongoing guidance to construction personnel and contractors to ensure compliance with environmental/permit regulations and mitigation measures. The qualified biologist shall perform the following: • Provide training materials and briefings to all personnel working on-site. The material shall include but not be limited to the identification	Prior to Project Initiation	Project Proponent

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Mitigation Measure	Timing	Responsible Party
and status of plant and wildlife species, significant natural plant community habitats (e.g., riparian), fire protection measures, and review of mitigation requirements. • A discussion of the federal and state Endangered Species Acts, Bald and Golden Eagle Protection Act, Migratory Bird Treaty Act, other state or federal permit requirements, and the legal consequences of non-compliance with these acts. • Attend the pre-construction meeting to ensure that timing/location of construction activities do not conflict with other mitigation requirements (e.g., seasonal surveys for nesting birds, pre-construction surveys, or relocation efforts). • Conduct meetings with the contractor and other key construction personnel describing the importance of restricting work to designated areas. Maps showing the location of special-status wildlife or populations of rare plants, exclusion areas, or other construction limitations (e.g., limitations on nighttime work) will be provided to the environmental monitors and construction crews prior to ground disturbance. • Discuss procedures for minimizing harm to or harassment of wildlife encountered during construction and provide a contact person in the event of the discovery of dead or injured wildlife.		

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Mitigation Measure	Timing	Responsible Party
• Ensure that all pipes, tubing, or similar items staged or stored at the Project site for one or more overnight periods shall be capped, screened, covered, or filled with material All pipes, tubing, or similar items shall be thoroughly inspected for wildlife by the qualified biologist or biological monitor, prior to capping or use in Project activities. • Review/designate the construction area in the field with the contractor in accordance with the final grading plan. • Ensure that haul roads, access roads, and on-site staging and storage areas are sited within grading areas to minimize degradation of vegetation communities adjacent to these areas (if activities outside these limits are necessary, they shall be evaluated by the biologist to ensure that no special-status species habitats will be affected). • Conduct a field review of the staking (to be set by the surveyor) designating the limits of all construction activity. • Flag or temporarily fence any construction activity areas immediately adjacent to riparian areas. • Ensure and document that required pre-construction surveys and/or relocation efforts have been implemented prior to Project activities.		

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 Los Angeles Department of Regional Planning
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Mitigation Measure	Timing	Responsible Party
Recommendation #3: Mitigation Ledger Verification To properly document 316.4 acres of permanent impacts associated with at Entrada South and 189.8 acres of permanent impacts at Valencia Commerce Center, CDFW requests the Project proponent provide a ledger or some appropriate accounting measure documenting the mitigation acreage debit from High Country, Salt Creek, and River Corridor conservation areas prior to Project activities.	Prior to Project Initiation	Project Proponent



OFFICE OF THE SHERIFF

COUNTY OF LOS ANGELES

HALL OF JUSTICE

ROBERT G. LUNA, SHERIFF



February 18, 2025

Mr. Jodie Sackett, Senior Planner
County of Los Angeles
Department of Regional Planning
Subdivisions
320 West Temple Street, Room 1362
Los Angeles, California 90012

Dear Mr. Sackett:

**ENTRADA SOUTH AND
VALENCIA COMMERCE CENTER PROJECT
NOTICE OF COMPLETION/NOTICE OF AVAILABILITY OF
DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT
REVIEW COMMENTS**

Thank you for inviting the Los Angeles County Sheriff's Department (Department) to review and comment on the December 20, 2025, Notice of Completion and Availability (NOC-NOA) of a Draft Supplemental Environmental Impact Report (Draft SEIR) for the Entrada South (ES) and Valencia Commerce Center (VCC) Project (Project). The proposed Project for ES is located on the west side of I-5 and The Old Road, on the north and south side of Magic Mountain Parkway, and south of Six Flags Magic Mountain theme park whereas VCC is located in an undeveloped portion of the partially completed VCC non-residential center and is located west of I-5 and north of SR-126. The proposed Project is a "Modified Project" that increases environmental protections for wetlands and related biological resources within the Entrada Planning Area and VCC Planning Area.

The ES and VCC Project is located within the service area of the Department's Santa Clarita Sheriff's Station (Station). After reviewing the Draft SEIR Project the modified ES project changes the residential use from 1,725 units, to 1,574 units and the Non-Residential areas from 450,000sf to 730,000sf; a reduction of 151 units and an increase in 280,000sf, respectively. There is no change to the VCC Planning area. Although the residential population decreased, the

211 WEST TEMPLE STREET, LOS ANGELES, CALIFORNIA 90012

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Mr. Sackett

- 2 -

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increase in non-residential areas will significantly increase the daytime and nighttime population and require an increase in law enforcement services for these areas.

The developer shall comply with the Los Angeles County Law Enforcement Facilities Mitigation Fee and/or applicable developer fees to address this Public Services impact.

For the comments provided on October 21, 2021, the Station expects the future project environmental documents to describe potential impacts on our resources and operations and identity measures, including development fees, that will mitigate these impacts to a level of insignificance, as applicable. The Station also highly recommends including the principles of Crime Prevention through Environmental Design (CPTED) when the Project applicants submit the design plans.

For future reference, the Department provides the following updated address and contact information for all requests for review comments, law enforcement service information, California Environmental Quality Act documents, and other related correspondence:

Jennifer Fang, Acting Breau Director
Facilities Planning Bureau
Los Angeles County Sheriff's Department
211 West Temple Street
Los Angeles, California 90012

Attention: Planning Section

Should you have any questions regarding this matter, please contact me at (323) 526-5657, or your staff may contact Ms. Yu Chun T. Ou of my staff, at (323) 526-5568.

Sincerely,

ROBERT G. LUNA, SHERIFF



Jennifer Fang, Acting Bureau Director
Facilities Planning Bureau

Los Angeles Regional Water Quality Control Board

February 18, 2025

Attn. Subdivisions (Jodie Sackett)
Los Angeles County
Department of Regional Planning
320 W. Tempe Street, Fl. 13
Los Angeles, CA 90012

COMMENTS ON THE DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT (SEIR) FOR THE ENTRADA SOUTH AND VALENCIA COMMERCE CENTER PROJECT (STATE CLEARINGHOUSE NO. 2000011025)

Thank you for the opportunity to comment on the Draft Supplemental Environmental Impact Report (SEIR) for the Entrada South and Valencia Commerce Center Project. The Los Angeles Regional Water Quality Control Board (Los Angeles Water Board) appreciates the opportunity to provide input on this SEIR.

The Los Angeles Water Board's goal is to protect beneficial uses within the Los Angeles Region consistent with the Federal Clean Water Act and the Porter-Cologne Water Quality Control Act, which requires careful consideration of projects which result in hydrogeomorphic changes and related adverse impacts to water quality and beneficial uses of waters of the State.

In consideration of the Los Angeles Water Board's objectives, we have the following comments on the SEIR:

1. (5.2 Biological Resources), Section (8) Jurisdictional Waters (a) Entrada South Planning Area

This section discusses the delineation of waters under the jurisdiction of the Army Corps of Engineers (Waters of the US), the Los Angeles Water Board (Waters of the State) and the California Department of Fish and Wildlife (CDFW). It states that "the State-certified EIR did not separately delineate the waters of the State" and assumes the limits of water of the State are similar to those of waters of the US. However, for natural streams and banks, the limits of the waters of the State generally extend beyond those of waters of the US which are usually delineated using the Ordinary High Water Mark (OHWM). An updated jurisdictional delineation of waters of the State for the Entrada South Planning Area should be provided to identify any impacts more accurately and provide/propose compensatory mitigation accordingly.

2. (5.2 Biological Resources), Section (8) Jurisdictional Waters (a) Entrada South Planning Area, sections (i), (ii), and (iii)

An updated jurisdictional delineation of waters of the State for the Entrada South Planning Area should be provided for the unnamed drainages 1, 2 and 3 to identify any impacts more

accurately and provide/propose compensatory mitigation accordingly. Sections (i), (ii), and (iii) and table 5.2-8 should be updated to reflect the findings of the jurisdictional delineation of waters of the State.

3. (5.2 Biological Resources), Section (8) Jurisdictional Waters (b)VCC Planning Area
Section (i) Castaic Creek

This section discusses the delineation of waters of the US, waters of the State and waters under CDFW jurisdiction in Castaic Creek. In 2024, an updated jurisdictional delineation was performed which included the waters of the State that were previously not included in the State-certified EIR. The updated delineation identifies 3.32 acres of waters of the United States and reports the acreage for waters of the State. As mentioned above, in general, for natural streams and banks, the jurisdictional limits of waters of the State extend beyond the OHWM used to delineate water of the US. An updated jurisdictional delineation of waters of the State for Castaic Creek should be provided to identify any impacts more accurately and provide/propose compensatory mitigation accordingly.

4. (5.2 Biological Resources), Section (8) Jurisdictional Waters (b)VCC Planning Area
Section (ii) Hasley Creek

This section discusses the delineation of waters of the US, waters of the State and waters under CDFW jurisdiction for Hasley Creek. It states that the Creek “currently supports 3.10 acres of waters of the United States, 4.06 acres of waters of the State, and 14.45 acres of CDFW-jurisdictional streambeds within the VCC Planning Area”. The difference between the acreage of waters of the State versus waters of the US seems to be solely due to the addition of two storm drains that are considered waters of the State but do not qualify as waters of the US. Details of the methods used in the 2024 jurisdictional delineation are not available, but it is assumed that the OHWM was used to delineate both waters of the US and Waters of the State. As mentioned above, the limits of waters of the State generally go beyond the OHWM. An updated jurisdictional delineation of waters of the State for Hasley Creek should be provided to identify any impacts more accurately and provide/propose compensatory mitigation accordingly.

5. (5.2 Biological Resources), Section (8) Jurisdictional Waters (b)VCC Planning Area
Section (iii) Live Oak Road Detention Basin

It is stated that the Live Oak Road Detention Basin is a manmade feature with no observable OHWM and is not considered a water of the US or water of the State. However, this basin is a waterbody that supports riparian vegetation and habitat, and it may be considered a jurisdictional feature by the Los Angeles Water Board. Further evaluation will be necessary to determine if the basin is a water of the State. If so, the removal of the basin will be considered a permanent impact that would need to be appropriately mitigated.

6. (5.2 Biological Resources), Section (8) Jurisdictional Waters (b)VCC Planning Area
Section (iv) The Old Road Agricultural Ditch

It is stated that the Old Road Agricultural Ditch is a manmade feature that does not support a relatively permanent flow of water and is therefore not a water of the US or water of the State. However, ephemeral waters are considered waters of the State. This ditch is a waterbody that supports habitat, and it is considered a water of the State. A delineation should be carried out to identify the limits of waters of the State. The removal of the ditch will be considered a permanent impact and will require appropriate compensatory mitigation.

February 18, 2025

Should you have any questions concerning this letter, please contact Snejana Toneva at (213) 576-7159 or Snejana.Toneva@waterboards.ca.gov. You may also contact Céline Gallon at (213) 576-6784 or Celine.Gallon@waterboards.ca.gov. When corresponding via email, please include our general email: RB4-401Certification@waterboards.ca.gov.

Sincerely,

for Susana Arredondo
Executive Officer
Los Angeles Water Quality Control Board

Cc [via email only]:

Matt Carpenter
Senior Vice President
Environmental Resources
FIVEPOINT

Elizabeth Payne
CWA Section 401 WQC Program
Division of Water Quality
State Water Resources Control Board

US EPA, Region 9
75 Hawthorne St, WTR-2-4
San Francisco, CA 94105

Aaron Allen
Army Corps of Engineers
Regulatory Branch, Los Angeles District

Victoria Tang
California Department of Fish and Wildlife
Streambed Alteration Team

Jonathan Snyder
U.S. Fish and Wildlife Service



**LOS ANGELES COUNTY
SANITATION DISTRICTS**
Converting Waste Into Resources

Robert C. Ferrante

Chief Engineer and General Manager

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
(562) 699-7411 • www.lacsd.org

January 17, 2025

Ref. DOC 7390856

VIA EMAIL subdivisions@planning.lacounty.gov, jsackett@planning.lacounty.gov

Ms. Jodie Sackett, Senior Planner
Los Angeles County Department of Regional Planning
320 West Temple Street, Floor 13
Los Angeles, CA 90012

Dear Ms. Sackett:

NOA Response to Entrada South and Valencia Commerce Center Project

The Santa Clarita Valley Sanitation District (District) received a Notice of Availability (NOA) of a Draft Supplemental Environmental Impact Report (DSEIR) for the subject project on December 20, 2024. We offer the following comments regarding sewerage service:

1. A portion of the project area is outside the jurisdictional boundaries of the District and will require annexation into the District before sewerage service can be provided to the proposed development. A copy of the Districts' Annexation Information and Processing Fee sheets is available on our website at [Annexation Program](#). For more specific information regarding the annexation procedure and fees, please contact Ms. Shirley Wang at shirlywang@lacsd.org or (562) 908-4288, extension 2708.
2. A portion of the proposed project may require a Districts' permit for Industrial Wastewater Discharge. Project developers should contact the Districts' Industrial Waste Section at (562) 908 4288, extension 2900, in order to reach a determination on this matter. If this permit is necessary, project developers will be required to forward copies of final plans and supporting information for the proposed project to the District for review and approval before beginning project construction. Additional Industrial Wastewater Discharge Permit information can be found on our website at [Industrial Wastewater Discharge Permits](#).
3. Due to the project's location, the flow originating from the proposed project would have to be transported to the Districts' trunk sewer by local sewer(s) that are not maintained by the Districts. If no local sewer lines currently exist, it is the responsibility of the developer to convey any wastewater generated by the project to the nearest local sewer and/or Districts' trunk sewer.
 - a. **Entrada South Project** - The nearest District's trunk sewer is the Districts' 30-inch diameter District 32 Main Trunk Sewer, located in The Old Road at Magic Mountain Parkway. This trunk sewer has a capacity of 16.1 million gallons per day (mgd) and conveyed a peak flow of 1.6 mgd when last measured in 2018.
 - b. **Valencia Commerce Center Project** – The following is a list of Districts' trunk sewer that serves the project area:

Name	Location	Size (dia.)*	Capacity (mgd)**	Peak Flow (mgd)	Last Measured
Castaic Trunk	Hasley Canyon Road at The Old Road	15	3.0	1.5	2018
Castaic Trunk	The Old Road at Biscailuz Drive	21	3.7	1.6	2018
Castaic Trunk	The Old Road at Turnberry Lane	24	5.5	1.0	2018
Castaic Trunk	The Old Road, south of Turnberry Lane	24	6.7	1.0	2018

*diameter in inches

**million gallons per day

4. The District operates two water reclamation plants (WRPs), the Saugus WRP and the Valencia WRP, which provide wastewater treatment in the Santa Clarita Valley. These facilities are interconnected to form a regional treatment system known as the Santa Clarita Valley Joint Sewerage System (SCVJSS). The SCVJSS has a capacity of 28.1 mgd and currently processes an average recycled flow of 19.3 mgd.
5. A copy of the District's average wastewater generation factors is available on our website at [Table 1, Loadings for Each Class of Land Use](#).
 - a. **Entrada South Project** - The expected average wastewater flow from the project, described in the DSEIR as 1,574 condominium units, 730,000 square feet of non-residential mixed-use retail, office development, and hotel uses, a neighborhood park, and potential school site, is 630,973 gallons per day (gpd).
 - b. **Valencia Commerce Center Project** – The expected average wastewater flow from the project, described in the DSEIR as 18,000 square feet of retail use, 2,909,700 square feet of office use, and 472,300 square feet of industrial use, is 973,220 gpd.
6. The Districts are empowered by the California Health and Safety Code to charge a fee to connect facilities (directly or indirectly) to the Districts' Sewerage System or to increase the strength or quantity of wastewater discharged from connected facilities. This connection fee is used by the Districts for its capital facilities. Payment of a connection fee may be required before this project is permitted to discharge to the Districts' Sewerage System. For more information and a copy of the Connection Fee Information Sheet, go to www.lacsd.org, under Services, then Wastewater (Sewage) and select Rates & Fees. In determining the impact to the Sewerage System and applicable connection fees, the Districts will determine the user category (e.g. Condominium, Single Family Home, etc.) that best represents the actual or anticipated use of the parcel(s) or facilities on the parcel(s) in the development. For more specific information regarding the connection fee application procedure and fees, please contact the Districts' Wastewater Fee Public Counter at (562) 908-4288, extension 2727. If an Industrial Wastewater Discharge Permit is required, connection fee charges will be determined by the Industrial Waste Section.
7. In order for the Districts to conform to the requirements of the Federal Clean Air Act (CAA), the capacities of the Districts' wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG). Specific policies included in the development of the SCAG regional growth forecast are incorporated into clean air plans, which are prepared by the South Coast and Antelope Valley Air Quality Management Districts in order to improve air quality in the South Coast and Mojave Desert Air Basins as mandated by the CAA. All expansions of Districts' facilities must be sized and service phased in a manner that will be consistent with the SCAG regional growth forecast for the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The available capacity of the Districts' treatment facilities will, therefore, be limited to levels associated with the approved growth identified by SCAG. As such, this letter does not constitute a guarantee of wastewater service but is to advise the developer that the Districts intend to provide this service up to the levels that are legally

permitted and to inform the developer of the currently existing capacity and any proposed expansion of the Districts' facilities.

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2742, or phorsley@lacsdsd.org.

Very truly yours,

Patricia Horsley

Patricia Horsley
Environmental Planner
Facilities Planning Department

PLH:plh

cc: S. Wang
D. Hatch
A. Howard

From: Eunice Ambriz <Eunice.Ambriz@sanmanuel-nsn.gov>
Sent: Monday, December 30, 2024 1:26 PM
To: DRP Subdivisions <subdivisions@planning.lacounty.gov>
Subject: Entrada South and Valencia Commerce Center Project No. 00-210(5), State Clearinghouse No. 2000011025 [COU-LA-2024-10]

CAUTION: External Email. Proceed Responsibly.

Dear Jodie Sackett,

Thank you for contacting the Yuhaaviatam of San Manuel Nation (formerly the San Manuel Band of Mission Indians) regarding the above-referenced project. YSMN appreciates the opportunity to review the project documentation, which was received by the Cultural Resources Management Department on December 20, 2024. The proposed project is located outside of Serrano ancestral territory and, as such, YSMN will not be requesting to receive consulting party status with the lead agency or to participate in the scoping, development, or review of documents created pursuant to legal and regulatory mandates.

Regards,
Eunice

Eunice Ambriz

Cultural Resources Technician

Eunice.Ambriz@sanmanuel-nsn.gov

O:(909) 864-8933 x 50-2033

M:(909) 649-4867

26569 Community Center Dr Highland, California 92346



ADAMS BROADWELL JOSEPH & CARDOZO

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

601 GATEWAY BOULEVARD, SUITE 1000
SOUTH SAN FRANCISCO, CA 94080-7037

TEL: (650) 589-1660
FAX: (650) 589-5062

kfederman@adamsbroadwell.com

SACRAMENTO OFFICE

520 CAPITOL MALL, SUITE 350
SACRAMENTO, CA 95814-4721

TEL: (916) 444-6201
FAX: (916) 444-6209

KEVIN T. CARMICHAEL
CHRISTINA M. CARO
THOMAS A. ENSLOW
KELILAH D. FEDERMAN
RICHARD M. FRANCO
ANDREW J. GRAF
TANYA A. GULESSERIAN
DARION N. JOHNSTON
RACHAEL E. KOSS
AIDAN P. MARSHALL
ALAURO R. MCGUIRE

Of Counsel

MARC D. JOSEPH
DANIEL L. CARDOZO

February 18, 2025

VIA EMAIL AND U.S. MAIL

Jodie Sackett, Senior Planner
Amy Bodek, Regional Planning Director
County of Los Angeles
Department of Regional Planning
320 W. Temple St., 13th Floor
Los Angeles, CA 90012

Emails:

jsackett@planning.lacounty.gov;
subdivisions@planning.lacounty.gov
abodek@planning.lacounty.gov

Re: Comments on Draft Supplemental Environmental Impact Report for Entrada South and Valencia Commerce Center Project (SCH No. 2000011025)

Dear Ms. Sackett, Ms. Bodek, and Ms. Zavala:

On behalf of Coalition for Responsible Equitable Economic Development Los Angeles ("CREED LA"), we submit these comments on the Draft Supplemental Environmental Impact Report ("DSEIR") prepared for the Entrada South and Valencia Commerce Center (VCC) Project (SCH No. 2000011025) ("Project"), proposed by Newhall Land and Farming Company ("Applicant").¹

The Project proposes to develop 1,574 residential units and 730,000 square feet of commercial development. This represents a reduction of 151 units from the 2017 Project and an additional 280,000 square feet of commercial floor area as compared to the 2017 Project.² The Project is located within the planning boundary of the Newhall Ranch Resource Management and Development Plan and

¹ County of Los Angeles, Entrada South and Valencia Commerce Center (VCC) Project Draft Supplemental Environmental Impact Report (Dec. 2024) (hereinafter "DSEIR").

² DSEIR, p. 3.0-2. [The 2017 Project refers to resource management activities and development facilitated by the RMDP/SCP, as approved by CDFW in 2017 for the Entrada South and VCC Planning Areas.]

Spineflower Conservation Plan approved by the California Department of Fish and Wildlife (“CDFW”) for which an EIR was certified in 2017 (SCH No. 2000011025) (referenced in the DSEIR and herein as the “State-certified EIR”). The DSEIR provides that construction of the Project will temporarily impact Hasley Creek and Castaic Creek, the DSEIR proposes restoration and revegetation following construction modifications. The State-certified EIR concluded that impacts associated with the 2017 Project would result in significant and unavoidable project level impacts related to air quality and land use, and cumulative impacts to air quality, and noise.

We have conducted an initial review of the DSEIR with the assistance of our technical consultants, air quality and hazardous resources expert Komal Shukla, Ph.D., and acoustics expert Jack Meighan, M.S.³ Based upon our review of the DSEIR and supporting documentation, we conclude that the DSEIR fails to comply with the requirements of CEQA.

As explained more fully below, the DSEIR fails to provide an accurate Project description, and does not accurately disclose analyze or mitigate the Project’s potentially significant air quality, health risk, noise, and land use impacts. The Project’s noise, air quality, and health risk impacts are more severe than analyzed in the State-certified EIR. The impacts of noise and vibration constitute new significant effects not discussed in the previous EIR, because the State-certified EIR did not analyze the significant noise and vibration impacts at the radio station within the Higher Vision Church. As a result of its shortcomings, the DSEIR lacks substantial evidence to support its conclusions and fails to properly mitigate the Project’s significant environmental impacts.

I. STATEMENT OF INTEREST

CREED LA is an unincorporated association of individuals and labor organizations that may be adversely affected by the potential public and worker health and safety hazards, and the environmental and public service impacts of the Project. The coalition includes the Sheet Metal Workers Local 105, International Brotherhood of Electrical Workers Local 11, Southern California Pipe Trades District Council 16, and the District Council of Ironworkers , along

³ Dr. Shukla’s and Mr. Meighan’s technical comments and curricula vitae are attached hereto as **Exhibits A, and B** respectively. The County must separately respond to these technical comments. Pub. Res. Code § 21091(d); 14 Cal. Code Regs (“CCR” or “CEQA Guidelines”) §§ 15088(a), (c).

with their members, their families, and other individuals who live and work in Los Angeles and surrounding communities.

Individual members of CREED LA and its member organizations include Garret Lewis, Aimee Vazquez, and Andrew Berg. These individuals live, work, recreate, and raise their families in Santa Clarita and LA County. Accordingly, they would be directly affected by the Project's environmental and health and safety impacts. Individual members may also work on the Project itself. They will be first in line to be exposed to any health and safety hazards that exist onsite.

In addition, CREED LA has an interest in enforcing environmental laws that encourage sustainable development and ensure a safe working environment for its members. Environmentally detrimental projects can jeopardize future jobs by making it more difficult and more expensive for business and industry to expand in the region, and by making the area less desirable for new businesses and new residents. Indeed, continued environmental degradation can, and has, caused construction moratoriums and other restrictions on growth that, in turn, reduce future employment opportunities.

II. LEGAL BACKGROUND

CEQA has two basic purposes, neither of which the DSEIR satisfies. First, CEQA is designed to inform decision makers and the public about the potential, significant environmental effects of a project.⁴ CEQA requires that an agency analyze potentially significant environmental impacts in an EIR.⁵ The EIR should not rely on scientifically outdated information to assess the significance of impacts, and should result from "extensive research and information gathering," including consultation with state and federal agencies, local officials, and the interested public.⁶ To be adequate, the EIR should evidence the lead agency's good faith effort at full disclosure.⁷ The EIR has been described as "an environmental 'alarm bell' whose purpose it is to alert the public and its responsible officials to environmental

⁴ CEQA Guidelines, § 15002, subd. (a)(1).

⁵ See Pub. Resources Code, § 21000; CEQA Guidelines, § 15002.

⁶ *Berkeley Keep Jets Over the Bay Comm. v. Board of Port Comm.* ("Berkeley Jets") (2001) 91 Cal.App.4th 1344, 1367.; *Schaeffer Land Trust v. San Jose City Council* (1989) 215 Cal.App.3d 612, 620.

⁷ CEQA Guidelines, § 15151; see also *Laurel Heights Improvement Assn. v. Regents of University of California* ("Laurel Heights I") (1988) 47 Cal.3d 376, 406.

changes before they have reached ecological points of no return.”⁸ “Thus, the EIR protects not only the environment but also informed self-government.”⁹

Second, CEQA directs public agencies to avoid or reduce environmental damage when possible by requiring alternatives or mitigation measures.¹⁰ The EIR serves to 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.”¹¹ If a project has a significant effect on the environment, the agency may approve the project only upon a 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 21081.¹²

A. Subsequent CEQA Review

When a previously approved project for which an EIR has been prepared is modified, CEQA requires the lead agency to conduct subsequent or supplemental environmental review when one or more of the following events occur:

- (a) Substantial changes are proposed in the project which will require major revisions of the environmental impact report;
- (b) Substantial changes occur with respect to the circumstances under which the project is being undertaken which will require major revisions in the environmental impact report; or
- (c) New information, which was not known and could not have been known at the time the environmental impact report was certified as complete, becomes available.¹³

In assessing the need for subsequent or supplemental environmental review, the lead agency must determine, on the basis of substantial evidence in light of the whole record, if one or more of the following events have occurred:

⁸ *County of Inyo v. Yorty* (1973) 32 Cal.App.3d 795, 810.

⁹ *Citizens of Goleta Valley v. Bd. of Supervisors* (1990) 52 Cal.3d 553, 564 (citations omitted).

¹⁰ CEQA Guidelines, § 15002, subd. (a)(2)-(3); *Berkeley Jets, supra*, 91 Cal.App.4th at 1354.

¹¹ CEQA Guidelines, § 15002, subd. (a)(2).

¹² *Id.*, subd. (b)(2)(A)-(B).

¹³ Pub. Resources Code § 21166; CEQA Guidelines § 15162.

- (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR due to the involvement of new significant effects or a substantial increase in the severity of previously identified effects;
- (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:
 - (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
 - (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
 - (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.¹⁴

As these comments will demonstrate, the DSEIR fails to comply with the requirements of CEQA and may not be used as the basis for approving the Project. It fails in significant aspects to perform its function as an informational document that is meant “to provide public agencies and the public in general with detailed information about the effect which a proposed project is likely to have on the environment” and “to list ways in which the significant effects of such a project

¹⁴ CEQA Guidelines §§ 15162(a)(1)-(3).

might be minimized.”¹⁵ The use of inaccurate and flawed information on which the DSEIR bases its conclusions results in underestimated Project impacts. This, in turn, leads to a failure to comply with CEQA’s requirement that an agency mitigate “all significant environmental impacts to the greatest extent feasible, and that any remaining significant environmental impacts are acceptable due to overriding considerations.”¹⁶

Mitigation of impacts to the fullest extent feasible requires an agency to accurately quantify the severity of Project impacts, and because the DSEIR’s inadequate analyses underestimate the severity of the Project’s impacts, the County has failed to comply with CEQA and cannot approve the Project based upon the DSEIR’s analyses and conclusions.

As detailed herein and in the expert consultant reports attached hereto, the Project’s environmental impacts are more severe than analyzed in the 2017 State-certified EIR. The impacts of noise and vibration constitute new significant effects not discussed in the previous EIR, because the State-certified EIR did not analyze the significant noise and vibration impacts at the radio station within the Higher Vision Church. A revised and recirculated SEIR is required to analyze the new and more severe impacts of the Project.

III. THE PROJECT DESCRIPTION IS INADEQUATE

The DSEIR does not meet CEQA’s requirements because it fails to include an accurate and complete Project description, rendering the entire analysis inadequate. California courts have repeatedly held that “an accurate, stable and finite project description is the *sine qua non* of an informative and legally sufficient EIR.”¹⁷ CEQA requires that a project be described with enough particularity that its impacts can be assessed.¹⁸ Without a complete project description, the environmental analysis under CEQA is impermissibly limited, thus minimizing the project’s impacts and undermining meaningful public review.¹⁹ Accordingly, a lead

¹⁵ *Laurel Heights I, supra*, 47 Cal.3d at p. 391.

¹⁶ CEQA Guidelines, §§ 15090, 15091.

¹⁷ *Stopthemillenniumhollywood.com v. City of Los Angeles* (2019) 39 Cal.App.5th 1, 17; *Communities for a Better Environment v. City of Richmond* (“*CBE v. Richmond*”) (2010) 184 Cal.App.4th 70, 85–89; *County of Inyo v. City of Los Angeles* (3d Dist. 1977) 71 Cal.App.3d 185, 193.

¹⁸ 14 CCR § 15124; *see, Laurel Heights I, supra*, 47 Cal.3d 376, 192-193.

¹⁹ *Id.*

agency may not hide behind its failure to obtain a complete and accurate project description.²⁰

CEQA Guidelines section 15378 defines “project” to mean “the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment.”²¹ “The term “project” refers to the activity which is being approved and which may be subject to several discretionary approvals by governmental agencies. The term project does not mean each separate governmental approval.”²² Courts have explained that a complete description of a project must “address not only the immediate environmental consequences of going forward with the project, but also all “*reasonably foreseeable* consequence[s] of the initial project.”²³ “If a[n]...EIR...does not adequately apprise all interested parties of the true scope of the project for intelligent weighing of the environmental consequences of the project, informed decisionmaking cannot occur under CEQA and the final EIR is inadequate as a matter of law.”²⁴

A. The DSEIR Fails to Attach or Adequately Describe the Development Agreement

The DSEIR provides that the Development Agreement is a required Project approval. But, the DSEIR fails to attach a copy of the Development Agreement or to provide any details regarding the terms thereof. The DSEIR provides only that the “Development Agreement may establish commitments by the Applicant to provide additional and project benefits.”²⁵

The County cannot make the necessary findings to approve the Project’s entitlements. Absent the Development Agreement in the record, the County cannot make the necessary findings that the Project is consistent with the Newhall Ranch Specific Plan. The Newhall Ranch Specific Plan requires that “All land use entitlements and permits (e.g., Development Agreements, Conditional Use Permits, and all subdivision maps) approved within the Specific Plan Area shall be

²⁰ *Sundstrom v. County of Mendocino* (“*Sundstrom*”) (1988) 202 Cal.App.3d 296, 311.

²¹ CEQA Guidelines § 15378.

²² *Id.*, § 15378(c).

²³ *Laurel Heights I*, 47 Cal. 3d 376, 398 (emphasis added); *see also Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal. 4th 412, 449-50.

²⁴ *Riverwatch v. Olivenhain Municipal Water Dist.* (2009) 170 Cal. App. 4th 1186, 1201.

²⁵ DSEIR, p. 2.0-19.

consistent with the Specific Plan.”²⁶ Without a copy of the Development Agreement in the record, the County cannot make the findings required by CEQA that the Project is consistent with the Specific Plan, and the public cannot be assured the Project is consistent with the Specific Plan before the Project is approved.

The Initial Study prepared for the Project by the County on October 7, 2021 provided that the County and the Applicant may consider a Development Agreement in accordance with Government Code Section 65864 as part of the Modified Project.²⁷ The Initial Study provided: that “[the Supplemental EIR will address the Development Agreement as a discretionary entitlement, if applicable.”²⁸

But, the DSEIR does not contain any information regarding the Development Agreement beyond the following:

The Development Agreement would not increase the level of development or the disturbance footprint of the Modified Project. The Development Agreement may establish commitments by the Applicant to provide additional environmental benefits.²⁹

The DSEIR fails to include any substantive information about the proposed scope or terms of the Development Agreement, and the County failed to attach the Development Agreement to the Appendices of the DSEIR.

Thus, CREED LA and other members of the public have not had the opportunity to review the proposed Agreement and the DSEIR fails to analyze its terms.

A development agreement is a contract between an agency and a developer establishing certain development rights with any person having a legal or equitable interest in the property at issue. The purpose of a development agreement is generally to extend the life of the entitlements in exchange for the provision of public benefits and to reduce the economic risk of development.³⁰ While a development agreement must advance an agency’s local planning policies, it may

²⁶ County of Los Angeles, Newhall Ranch Specific Plan Volume I, Project No. 94087, SCH No. 95011015 (May 2003), p. 3-2.

²⁷ Los Angeles County Department of Regional Planning, Entrada South and Valencia Commerce Center Project Initial Study (Oct. 7, 2021).

²⁸ *Id.* at p. 18/106.

²⁹ DSEIR, p. 3.0-44.

³⁰ Gov. Code §§ 65864-65869.5.

also contain provisions that vary from otherwise applicable zoning standards and land use requirements as long as the project is consistent with the general plan and any applicable specific plan.³¹ Such provisions may result in significant impacts and land use inconsistencies that must be considered by the public and decision makers prior to approval. For this reason, it is critical that the terms of a proposed development agreement be disclosed to the public and analyzed during a project's CEQA review in order to determine whether the development agreement may have potentially significant impacts that are not otherwise inherent in the project.

When a development agreement is required to implement a project, it is considered part of the project under CEQA.³² Development agreements must be enacted in accordance with the Government Code and applicable local planning codes, and must undergo environmental review at the time of adoption. Therefore, the terms of any development agreement for the Project must be described in detail in the EIR and considered by the County's decision makers at the same time as the rest of the Project approvals.

Because the Development Agreement was not included in the DSEIR's analysis of the Project and has not been made available for public review, the DSEIR must be revised and recirculated in order to give the public an opportunity to comment on the Project's adverse impacts or mitigation measures that are changed by the terms of the Agreement.³³ Additionally, the public must have an opportunity to evaluate the specific public benefits conferred by the Agreement, as the County has great discretion in determining what constitutes a public benefit and must be given an opportunity to evaluate and comment on the Agreement. Examples of public benefits could include community workforce or skilled and trained workforce requirements, funds or community services provided to the County to offset air quality, traffic, and public health impacts associated with the Project. County residents and other members of the public must be given the opportunity to provide input to the County on what public benefits the County should require. As it stands, there is no evidence that the County has considered including any meaningful public benefits in return for conferring a generous extension of the land use entitlements for the Project.

³¹ *Id.*

³² See Gov. Code § 65864; 14 CCR §§15352(a), (b), 15378; *Save Tara v. City of West Hollywood* (2008) 45 Cal.4th 116.

³³ 14 CCR §15088.5(a); *Laurel Heights Improvement Ass'n v. Regents of Univ. of Cal.* (1993) 6 Cal.4th 1112.

The County must release the Development Agreement to the public, and evaluate the environmental impacts of the Project in light of the proposed terms of the Agreement prior to approval of the Project. The County must also recirculate the DSEIR to include this analysis.

B. The Project Description Fails to Include Reasonably Foreseeable Backup Generators

The DSEIR fails to disclose potential backup/emergency stationary generators for the Project construction and operation. The DSEIR's project description does not address whether backup generators will be used during Project construction or operations, and the DSEIR's technical analyses assume no backup generators will be installed. The DSEIR does not disclose any conditions or mitigation measures that limit or prevent use of backup generators. The DSEIR must disclose and analyze the potential use of backup generators because (1) they are a reasonably foreseeable use and consequence of the Project, and (2) the use of backup generators will substantially increase the Project's significant environmental effects.

In *East Oakland Stadium Alliance v. City of Oakland*,³⁴ the Court of Appeal upheld an EIR's analysis of emissions from backup generators. The EIR's analysis assumed that generators would operate for 50 hours of testing and maintenance annually, while allocating no time for actual emergency use. In discussing the lead agency's duty to analyze backup generator emissions, the Court stated that "if the annual need for emergency generator use is reasonably foreseeable, the EIR was not entitled to disregard such use merely because it would occur at unpredictable times."³⁵ The Court explained that use of a generator was reasonably foreseeable because, "[a]s noted in the EIR, some parts of the Bay Area are subject to predictable, sustained power outages undertaken to reduce the risk of fire."³⁶ Thus, "[t]he EIR was required to make neither a generally applicable nor a worst-case assumption; rather it was required to make a reasonable estimate of likely annual use of the generators at the project site."³⁷

Here, as in *East Oakland Stadium Alliance*, back-up generators are a reasonably foreseeable consequence of the Project's construction and operation due

³⁴ (2023) 889 Cal. App. 5th 1226.

³⁵ *Id.* at 1252.

³⁶ *Id.* at 1253.

³⁷ *Id.*

to increasingly common Public Safety Power Shutoff (“PSPS”) events and extreme heat events. Extreme heat events (“EHE”) are defined as periods where in the temperatures throughout California exceed 100 degrees Fahrenheit.³⁸ From January 2019 through December 2019, Southern California Edison reported 158 of their circuits underwent a PSP event.³⁹ In Los Angeles County, two circuits had 4 PSPS events during that period, lasting an average of 35 to 38 hours. The total duration of the PSPS events lasted between 141 hours to 154 hours in 2019. According to the California Public Utilities Commission (CPUC) de-energization report⁴⁰ in October 2019, there were almost 806 PSPS events that impacted almost 973,000 customers (~7.5% of households in California) of which ~854,000 of them were residential customers. The California Air Resources Board estimates that with 973,000 customers impacted by PSPS events in October 2019, approximately 125,000 back-up generators were used by customers to provide electricity during power outage.⁴¹ The widespread use of back-up generators to adapt to PSPS and EHE events suggests that back-up generators are a reasonably foreseeable consequence of the Project.

Backup generators commonly rely on fuels such as natural gas or diesel,⁴² and thus can significantly impact air quality, GHG emissions, and public health through toxic diesel particulate matter (“DPM”) emissions.⁴³ It is reasonably

³⁸ Governor of California. 2021. Proclamation of a state of emergency. June 17, 2021.

³⁹ SCAQMD. 2020. Proposed Amendment To Rules (PARS) 1110.2, 1470, and 1472. Dated December 10, 2020. http://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1110.2/1110-2_1470_1472/par1110-2_1470_wgm_121020.pdf?sfvrsn=6.

⁴⁰ <https://www.cpuc.ca.gov/deenergization/> as cited in CARB, 2020. Potential Emission Impact of Public Safety Power Shutoff (PSPS), Emission Impact: Additional Generator Usage associated With Power Outage..

⁴¹ California Air Resources Board, Emission Impact: Additional Generator Usage Associated with Power Outage (January 30, 2020), available at <https://ww2.arb.ca.gov/resources/documents/emissions-impact-generator-usage-during-psps>.

⁴² SCAQMD, Fact Sheet on Emergency Backup Generators, <http://www.aqmd.gov/home/permits/emergency-generators> (“Most of the existing emergency backup generators use diesel as fuel”).

⁴³ California Air Resources Board, Emission Impact: Additional Generator Usage Associated with Power Outage (January 30, 2020), available at <https://ww2.arb.ca.gov/resources/documents/emissions-impact-generator-usage-during-psps> (showing that generators commonly rely on gasoline or diesel, and that use of generators during power outages results in excess emissions); California Air Resources Board, Use of Back-up Engines for Electricity Generation During Public Safety Power Shutoff Events (October 25, 2019), available at <https://ww2.arb.ca.gov/resources/documents/use-back-engines-electricity-generation-during-public-safety-power-shutoff> (“When electric utilities de-energize their electric lines, the demand for back-up power increases. This demand for reliable back-up power has health impacts of its own. Of particular

foreseeable that the Project would require on-site backup generators during the Project's eight years of construction and during Project operation.

Generators can emit criteria air pollutants, greenhouse gases, and toxic air contaminants ("TACs"). Backup generators commonly rely on fuels such as natural gas or diesel,⁴⁴ and thus can significantly impact public health through DPM emissions.⁴⁵ Diesel back-up generators emit significant amounts of Nitrogen Oxides ("NOx"), sulfur dioxides ("SO2"), particulate matter ("PM10"), carbon dioxide ("CO2"), carbon monoxide ("CO"), and volatile organic compounds ("VOC").⁴⁶ The

concern are health effects related to emissions from diesel back-up engines. Diesel particulate matter (DPM) has been identified as a toxic air contaminant, composed of carbon particles and numerous organic compounds, including over forty known cancer-causing organic substances. The majority of DPM is small enough to be inhaled deep into the lungs and make them more susceptible to injury. Much of the back-up power produced during PSPS events is expected to come from engines regulated by CARB and California's 35 air pollution control and air quality management districts (air districts)").

⁴⁴ SCAQMD, Fact Sheet on Emergency Backup Generators, <http://www.aqmd.gov/home/permits/emergency-generators> ("Most of the existing emergency backup generators use diesel as fuel").

⁴⁵ California Air Resources Board, Emission Impact: Additional Generator Usage Associated with Power Outage (January 30, 2020), available at <https://ww2.arb.ca.gov/resources/documents/emissions-impact-generator-usage-during-psps> (showing that generators commonly rely on gasoline or diesel, and that use of generators during power outages results in excess emissions); California Air Resources Board, Use of Back-up Engines for Electricity Generation During Public Safety Power Shutoff Events (October 25, 2019), available at <https://ww2.arb.ca.gov/resources/documents/use-back-engines-electricity-generation-during-public-safety-power-shutoff> ("When electric utilities de-energize their electric lines, the demand for back-up power increases. This demand for reliable back-up power has health impacts of its own. Of particular concern are health effects related to emissions from diesel back-up engines. Diesel particulate matter (DPM) has been identified as a toxic air contaminant, composed of carbon particles and numerous organic compounds, including over forty known cancer-causing organic substances. The majority of DPM is small enough to be inhaled deep into the lungs and make them more susceptible to injury. Much of the back-up power produced during PSPS events is expected to come from engines regulated by CARB and California's 35 air pollution control and air quality management districts (air districts)").

⁴⁶ University of California, Riverside Bourns College of Engineering—Center for Environmental Research and Technology, Air Quality Implications Of Backup Generators In California, (March 2005), pg. 8, available at <https://citeseerx.ist.psu.edu/document?repid=rep1&type=pdf&doi=84c8463118e4813a117db3d768151a8622c4bf6b>; South Coast AQMD, Fact Sheet on Emergency Backup Generators ("Emissions of Nitrogen Oxides (NOx) from diesel-fired emergency engines are 200 to 600 times greater, per unit of electricity produced, than new or controlled existing central power plants fired on natural gas. Diesel-fired engines also produce significantly greater amounts of fine particulates and toxics

DSEIR's failure to consider the reasonably foreseeable use of back-up generators results in an underestimation of the Project's air quality, greenhouse gas, and health risk impacts.

In sum, omission of the Project's generator usage during construction and operation results in an underestimation of the Project's reasonably foreseeable air quality, greenhouse gas, energy, and health risk impacts. Therefore, the DSEIR must be revised and recirculated to address the impacts of backup generators, revise this project description omission, and correct the affected impacts analyses to accurately disclose the Project's potentially significant air quality and health risk impacts associated with backup generators.

IV. THE DSEIR FAILS TO ADEQUATELY DISCLOSE AND MITIGATE POTENTIALLY SIGNIFICANT AIR QUALITY AND HEALTH RISK IMPACTS

An EIR must fully disclose all potentially significant impacts of a project, and implement all feasible mitigation to reduce those impacts to less than significant levels. The lead agency's significance determination with regard to each impact must be supported by accurate scientific and factual data.⁴⁷ An agency cannot conclude that an impact is less than significant unless it produces rigorous analysis and concrete substantial evidence justifying the finding.⁴⁸

Moreover, the failure to provide information required by CEQA is a failure to proceed in the manner required by CEQA.⁴⁹ Challenges to an agency's failure to proceed in the manner required by CEQA, such as the failure to address a subject required to be covered in an EIR or to disclose information about a project's environmental effects or alternatives, are subject to a less deferential standard than challenges to an agency's factual conclusions.⁵⁰ In reviewing challenges to an agency's approval of an EIR based on a lack of substantial evidence, the court will "determine de novo whether the agency has employed the correct procedures, scrupulously enforcing all legislatively mandated CEQA requirements."⁵¹

emissions compared to natural gas fired equipment."), available at <http://www.aqmd.gov/home/permits/emergency-generators#Fact2>.

⁴⁷ 14 CCR § 15064(b).

⁴⁸ *Kings Cty. Farm Bur. v. Hanford* (1990) 221 Cal.App.3d 692, 732.

⁴⁹ *Sierra Club v. State Bd. Of Forestry* (1994) 7 Cal.4th 1215, 1236.

⁵⁰ *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 435.

⁵¹ *Id.*; *Madera Oversight Coal., Inc. v. County of Madera* (2011) 199 Cal. App. 4th 48, 102.

Even when the substantial evidence standard is applicable to agency decisions to certify an EIR and approve a project, reviewing courts will not ‘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.’”⁵²

A. The Project’s Significant Health Risk Impacts Must Be Analyzed in a Health Risk Assessment

Due to the Project’s proximity to Interstate 5, the South Coast Air Quality Management District recommended a mobile source health risk assessment be prepared to disclose potential health risks.⁵³ The DSEIR provides that the cancer risk in the area is predominately related to nearby sources of diesel particulate matter (e.g., vehicular traffic on Interstate 5).⁵⁴ But, no health risk assessment was prepared, nor made part of the DSEIR’s administrative record.

The DSEIR provides that “[b]ased on SCAQMD guidance, the operational land use changes associated with the Modified Project would not be considered a substantial source of diesel particulate matter warranting a refined health risk assessment (HRA).”⁵⁵ Substantial evidence in Dr. Shukla’s comments demonstrates that the Project does constitute a land use change which must be considered a substantial source of diesel particulate matter emissions, due to the Project’s substantial increase in diesel particulate matter emissions from mobile sources, construction and operational backup generators, and construction equipment.⁵⁶

Further, Dr. Shukla’s comments demonstrate that, similar to criteria air pollutants, toxic air contaminants (TACs) originate from stationary, areawide, and mobile emission sources, contributing to elevated regional and localized health risks, particularly in high-traffic corridors, industrial zones, and areas adjacent to

⁵² *Berkeley Jets*, 91 Cal.App.4th at 1355.

⁵³ DSEIR, Appendix 1c – NOP Comment Letters, Letter from Lijin Sun Program Supervisor, CEQA IGR South Coast Air Quality Management District to Jodie Sacket, Senior Planner, County of Los Angeles, Regional Planning Department, Notice of Preparation of a Draft Supplemental Environmental Impact Report for the Proposed Entrada South and Valencia Commerce Center Project (SCH No.: 2000011025) (Nov. 2, 2021), p. 307 of 417, *available at*: <https://ceqanet.opr.ca.gov/2000011025/14/Attachment/sqOa73>.

⁵⁴ DSEIR, p. 5.1-30.

⁵⁵ DSEIR, p. 5.1-62.

⁵⁶ Shukla Comments, p. 10.

major roadways.⁵⁷ The ten most hazardous air toxics in California, as identified by the California Air Resources Board (CARB) and the Office of Environmental Health Hazard Assessment (OEHHA), include:^{58,59}

- Acetaldehyde
- Benzene
- 1,3-Butadiene
- Carbon tetrachloride
- Diesel particulate matter (DPM)
- Formaldehyde
- Hexavalent chromium
- Methylene chloride
- Para-dichlorobenzene
- Perchloroethylene

Among these, DPM poses the greatest statewide cancer risk, accounting for approximately 70% of the known cancer risk from outdoor air toxics.⁶⁰ Mobile sources of criteria air pollutants and TACs like DPM, will be significant to sensitive receptors at and around the Project site.

Given that mobile source emissions from Interstate 5 are already existing, it is clear that the DSEIR failed to analyze conformance with Public Resources Code § 15126.2(a) which requires EIRs to “analyze any significant environmental effects the project might cause or risk exacerbating by bringing development and people into the area affected.” In *California Bldg. Indus. Ass’n v Bay Area Air Quality Mgmt. Dist.*, the court held that an EIR must evaluate a project’s “potentially significant exacerbating effects on existing environmental hazards.”⁶¹ For example, if a project were to disturb contaminated soil and disperse the contamination, that change to existing environmental conditions would be a project impact that must be evaluated as such under CEQA.⁶² If the contaminated soil on the site were left undisturbed, however, that would simply be an existing environmental condition

⁵⁷ Shukla Comments, p. 11.

⁵⁸ CARB, Diesel Exhaust & Health; [Overview: Diesel Exhaust & Health | California Air Resources Board](#)

⁵⁹ Cal/EPA OEHHA and American Lung Association of California, Health Effects of Diesel Exhaust; <https://oehha.ca.gov/media/downloads/calenviroscreen/indicators/diesel4-02.pdf>

⁶⁰ Shukla Comments, p. 11.

⁶¹ *California Bldg. Association v Bay Area Air Quality Management District* (2015) 62 C4th 369, 388.

⁶² *Id.* at 389.

that need not be examined as an impact of the project.⁶³ “Because this type of inquiry still focuses on the *project’s impacts on the environment* – how a project might worsen existing conditions – directing an agency to evaluate how such worsened conditions could affect the project’s future users or residents is entirely consistent with this focus and with CEQA as a whole.”⁶⁴ Here, by bringing residences to the area already affected by significant DPM and exacerbating such impacts, the Project results in a significant environmental effect pursuant to CEQA Guidelines Section 15126.2(a). The DSEIR therefore fails as an informational document under CEQA, and is not compliant with CEQA. The Project’s substantial environmental and public health impacts from mobile source emissions must be analyzed in a revised and recirculated SEIR before the Project can lawfully be approved.

The County’s failure to prepare a health risk assessment is a violation of CEQA. In *Sierra Club v. County of Fresno*, the County’s failure to include a health risk analysis in the EIR enabled the California Supreme Court to find “the EIR insufficient because it failed to explain why it was not feasible to provide an analysis that connected the air quality effects to human health consequences.”⁶⁵ Here, the DEIR is likewise insufficient because it fails to connect the Project’s air quality impacts with human health consequences. “Without such information, the general public and its responsible officials cannot make an informed decision on whether to approve the project.”⁶⁶ The DSEIR should be revised and recirculated to include a quantified health risk analysis to connect the Project’s impacts with human health consequences.

“CEQA requires that an EIR make a reasonable effort to discuss relevant specifics regarding the connection between two segments of information already contained in the EIR, the general health effects associated with a particular pollutant and the estimated amount of that pollutant the project will likely produce.”⁶⁷ Further, “[t]his discussion will allow the public to make an informed decision, as CEQA requires.”⁶⁸ The County must prepare a health risk assessment in a revised and recirculated SEIR before the Project can be approved.

⁶³ *Id.*

⁶⁴ *Id.*

⁶⁵ *Id.*

⁶⁶ *Santa Clarita Organization for Planning the Environment* 106 Cal.App.4th 715, 724.

⁶⁷ *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 521.

⁶⁸ *Id.*

B. The DSEIR Fails to Analyze Air Quality Impacts of and Generators

The DSEIR does not analyze emissions associated with the use of generators during Project construction.⁶⁹ But, the Air Quality Technical Report relies on mitigation PDF-AQ-5 which provides that “During the Project’s construction phase, electricity from on-site power poles shall be utilized where available... In the event of an emergency or during a power outage, the use of generators shall be permissible.”⁷⁰ The Air Quality Technical Report further provides that “*the air quality benefits of this project design feature are conservatively not quantified for purposes of this analysis because construction emissions are not recalculated as part of the Supplemental EIR.*”⁷¹ The County fails to analyze the air quality benefits or detrimental impacts of the use of generators, in violation of CEQA. The County’s failure to quantify emissions associated with backup generators is a failure to proceed in the manner required by law.

The DSEIR relies on Mitigation Measure AQ-7 which requires Applicant to “Use on-site electricity or alternative fuels rather than diesel-powered or gasoline powered, to the extent feasible.”⁷² The DSEIR’s Air Quality Technical Report provides that “*This measure will be binding on the Modified Project...*”⁷³ The DSEIR’s Air Quality Technical Report’s determination that the measure is binding on the Modified Project is not correct. The measure provides that on-site electricity or alternative fuels should be utilized, *to the extent feasible*. The language “to the extent feasible” renders Mitigation Measure AQ-7 unenforceable. Mitigation measures must be fully enforceable through permit conditions, agreements or other legally binding instruments.⁷⁴ Failure to include enforceable mitigation measures is considered a failure to proceed in the manner required by CEQA.⁷⁵ In order to meet this requirement, mitigation measures must be incorporated directly into the EIR to be enforceable.⁷⁶ The DSEIR fails as an informational document for its lack of clear mitigation methods and lack of sufficient data to evaluate the proposed

⁶⁹ DSEIR, Greenhouse Gas and Energy Report Appendix A, p. 109 of 111.

⁷⁰ DSEIR Appendix 5.1 Air Quality Technical Report, p. 5.

⁷¹ *Id.*

⁷² DSEIR Appendix 5.1 Air Quality Technical Report, p. 6.

⁷³ *Id.*

⁷⁴ *Id.* at §15126.4(a)(2).

⁷⁵ *San Joaquin Raptor Rescue Ctr. v. County of Merced* (2007) 149 Cal.App.4th 645, 672.

⁷⁶ *Lotus v. Dept of Transportation* (2014) 223 Cal. App. 4th 645, 651-52.

project.⁷⁷ The DSEIR must be revised and recirculated to mitigate significant air quality impacts from generators.

V. THE DSEIR VIOLATES CEQA BECAUSE IT FAILS TO MEANINGFULLY ANALYZE AND IMPLEMENT ALL FEASIBLE MITIGATION MEASURES

“CEQA was intended to be interpreted in such a manner as to afford the fullest possible protection to the environment within the reasonable scope of the statutory language.”⁷⁸ A core tenet of CEQA is to “[p]revent significant, avoidable damages to the environment by requiring changes in the projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible.”⁷⁹ In fact, “***CEQA establishes a duty for public agencies to avoid or minimize environmental damage where feasible.***”⁸⁰

A public agency cannot approve a project if there are feasible alternatives or mitigation measures available that would substantially lessen any significant effects that the project would have on the environment.⁸¹ CEQA defines “feasible” as “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors.”⁸²

“The core of an EIR is the mitigation and alternatives sections.”⁸³ The CEQA Guidelines define mitigation as a measure which (1) avoids the impact altogether by not taking a certain action or parts of an action, (2) ***minimizes the impact by limiting the degree or magnitude of the action and its implementation***, (3) rectifies the impact by repairing, rehabilitating, or restoring the impacted environment, (4) reduces or eliminates the impact overtime by preservation and maintenance operations during the life of the action, and (5) compensates for the impact by replacing or providing substitute resources or environments.⁸⁴

⁷⁷ *Id.*

⁷⁸ *Friends of Mammoth v. Board of Supervisors* (1972) 8 Cal.3d 247, 259; 14 Cal. Code Regs. (“CEQA Guidelines”) § 15003(f).

⁷⁹ CEQA Guidelines § 15002(a)(2).

⁸⁰ *Id.* § 15021(a) (emphasis added).

⁸¹ *Id.* § 15021(a)(2).

⁸² Pub. Resources Code § 21061.1; CEQA Guidelines § 15364.

⁸³ *Citizens of Goleta Valley v. Bd. of Supervisors* (“*Goleta II*”) (1990) 52 Cal.3d 553, 564.

⁸⁴ CEQA Guidelines § 15370 (emphasis added).

“In deciding whether changes in a project are feasible, an agency may consider specific, economic, environmental, legal, social, and technological factors.”⁸⁵ The duty to prevent or minimize environmental damage is implemented through the findings required by Public Resources Code § 21081 and CEQA Guidelines § 15091.⁸⁶ These sections prohibit a lead agency from approving a project with significant impacts unless it makes one or more of three findings:

- (1) Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment.⁸⁷
- (2) Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.⁸⁸
- (3) Specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or project alternatives identified in the environmental impact report.⁸⁹

These findings must be supported by substantial evidence.⁹⁰ Substantial evidence is defined as “enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached.”⁹¹ It includes “facts, reasonable assumptions predicated on facts, and expert opinion supported by facts,”⁹² but it does not include “[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment.”⁹³

Rejected alternatives and mitigation measures must be “truly infeasible.”⁹⁴ When an agency finds a specific alternative or mitigation measure to be infeasible, “its analysis must explain in meaningful detail the reasons and facts supporting the conclusion. The

⁸⁵ *Id.* § 15021(b).

⁸⁶ Pub. Resources Code § 21081(a); CEQA Guidelines § 15091(a).

⁸⁷ Pub. Resources Code § 21081(a)(1); CEQA Guidelines § 15091(a)(1).

⁸⁸ Pub. Resources Code § 21081(a)(2); CEQA Guidelines § 15091(a)(2).

⁸⁹ Pub. Resources Code § 21081(a)(3); CEQA Guidelines § 15091(a)(3).

⁹⁰ Pub. Resources Code § 21081.5; CEQA Guidelines § 15091(b).

⁹¹ CEQA Guidelines § 15384(a).

⁹² *Id.* § 15384(b).

⁹³ *Id.* § 15384(a).

⁹⁴ *City of Marina v. Bd. of Trustees of Cal. State Univ.* (2006) 39 Cal.4th 341, 369.

analysis must be sufficiently specific to permit informed decision-making and public participation.”⁹⁵ Conclusory statements are inadequate.⁹⁶ As the Supreme Court recently explained in *Sierra Club v. County of Fresno*:⁹⁷

When reviewing whether a discussion is sufficient to satisfy CEQA, a court must be satisfied that the EIR (1) includes sufficient detail to enable those who did not participate in its preparation to understand and to consider meaningfully the issues the proposed project raises, and (2) makes a reasonable effort to substantively connect a project’s air quality impacts to likely ... consequences.⁹⁸

This holding applies equally to an EIR’s discussion of impacts and of the adequacy of mitigation measures, and restates the well-established rule that an EIR is inadequate as a matter of law where (1) it omits information required by law and (2) the omission precludes informed decision making by the lead agency or informed participation by the public.⁹⁹

If significant effects still exist after all feasible mitigation measures and alternatives have been implemented, a project may still be approved if the “unmitigated effects are outweighed by the project’s benefits.”¹⁰⁰ However, the Supreme Court clarified that, “[e]ven when a project’s benefits outweigh its unmitigated effects, **agencies are still required to implement all mitigation measures unless those measures are truly infeasible.**”¹⁰¹

The DSEIR fails to provide “a reasoned analysis supported by factual information” that the Project’s air quality and health risk impacts are adequately mitigated by measures in the State-certified EIR. In fact, substantial evidence in the expert reports attached demonstrates that the Project results in significant environmental impacts which are not sufficiently mitigated by mitigation measures in the State-certified EIR.

⁹⁵ *Marin Mun. Water Dist. V. KG Land California Corp.* (1991) 235 Cal. App.3d 1652, 1664.

⁹⁶ *Village Laguna of Laguna Beach v. Bd. of Supervisors* (1982) 134 Cal.App.3d 1022, 1034-35.

⁹⁷ *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502.

⁹⁸ *Id.* at 516, citing *Laurel Heights Improvement Assn. v. Regents of University of Cal.* (“*Laurel Heights I*”) (1988) 47 Cal.3d 376, 405.

⁹⁹ *Id.*; *Madera Oversight Coalition, Inc. v. County of Madera* (2011) 199 Cal.App.4th 48,76-77.

¹⁰⁰ *Sierra Club*, 6 Cal. 5th at 524, citing *Laurel Heights I*, 47 Cal.3d at 391.

¹⁰¹ *Sierra Club*, 6 Cal. 5th at 524-25 (emphasis added).

Dr. Shukla's comments demonstrate that the Project's air quality and health risk impacts are not adequately mitigated by measures detailed in the State-certified EIR. Further, substantial additional mitigation measures are required to adequately reduce the Project's significant impacts. These include:

- 1. Idling Time Reduction to 2 Minutes:** While reducing idling time to 5 minutes can help mitigate some emissions, it is insufficient to address the substantial DPM emissions during construction, especially during prolonged idling periods. A reduction to 2 minutes is recommended, as this further limits the duration of unnecessary fuel combustion and particulate emissions. This practice can be enforced through monitoring and penalties for non-compliance. The implementation of this measure, in combination with the use of cleaner equipment, would significantly reduce the emissions of particulate matter during construction activities.¹⁰²
- 2. Switching to Cleaner Fuels:** Utilizing low-sulfur diesel or alternative fuels such as compressed natural gas (CNG), electric, or hybrid equipment can further reduce emissions from construction activities. These alternative fuel sources produce fewer particulates and toxic pollutants than conventional diesel fuel, especially when applied to high-use construction equipment.¹⁰³
- 3. Limiting the Use of Diesel-Powered Equipment During High-Pollution Days:** Implementing a restriction on the operation of diesel-powered construction equipment during days when air quality is forecasted to be poor can help mitigate temporary spikes in particulate pollution. This strategy can be informed by Air Quality Index (AQI) forecasts and help reduce the health risks associated with elevated exposure to DPM.¹⁰⁴

Dr. Shukla's comments provide substantial evidence that air pollution and health risk impacts from Project construction, operation, and from mobile sources will result in significant environmental impacts not disclosed in the State-certified EIR. Dr. Shukla's comments demonstrate that the above measures can feasibly reduce the Project's significant environmental impacts. These feasible mitigation measures must be included in a Mitigation Monitoring and Reporting Program in a revised and recirculated SEIR before the Project can lawfully be approved.

¹⁰² U.S. EPA, Learn About Idling Reduction Technologies (IRTs) for Trucks and School Buses; <https://www.epa.gov/verified-diesel-tech/learn-about-idling-reduction-technologies-irts-trucks-and-school-buses>

¹⁰³ U.S. EPA, Final Rule for Control of Emissions of Air Pollution From Nonroad Diesel Engines; <https://www.epa.gov/regulations-emissions-vehicles-and-engines/final-rule-control-emissions-air-pollution-nonroad-0>

¹⁰⁴ Shukla Comments, p. 10.

The above measures are considerably different from those analyzed in the previous EIR and would substantially reduce one or more significant effects on the environment, but the project proponents declined to adopt the mitigation measure or alternative, as they are not included in the DSEIR or the State-certified EIR. The above measures must be included in a revised SEIR before the Project can proceed.

VI. THE DSEIR FAILS TO ADEQUATELY DISCLOSE, ANALYZE, AND MITIGATE THE PROJECT'S POTENTIALLY SIGNIFICANT NOISE IMPACTS

A. The Project Results in Significant Groundborne Vibration More Severe than the 2017 Project

The DSEIR concludes absent substantial evidence that the Project would not result in new or substantially more severe significant impacts than the 2017 Project with respect to groundborne vibration and groundborne noise levels. To the contrary, substantial evidence demonstrates that the Project will result in significant groundborne vibration which is substantially more severe than disclosed in the 2017 State-certified EIR.

CREED LA's noise and vibration expert consultant Jack Meighan identified a significant groundborne vibration impact to the sensitive receptors within the radio studio located 250 feet from potential development at the Project site and 185 feet from potential grading.¹⁰⁵

The State-certified EIR did not analyze or mitigate noise and vibration impacts to the recording studio. Substantial evidence in Mr. Meighan's comments demonstrates that construction vibration and groundborne noise caused by vibration-generating activities has the potential to exceed thresholds needed for quiet recording spaces.¹⁰⁶ Mr. Meighan calculated that loaded trucks and large bulldozers would generate noise over the threshold of significance at the closest grading activities.¹⁰⁷ Vibratory Rollers would similarly generate noise in excess of the threshold at the closest building construction of 250 feet.¹⁰⁸ Substantial evidence in Mr. Meighan's comments demonstrates that vibratory pile driving could

¹⁰⁵ Meighan Comments, p. 2.

¹⁰⁶ Meighan Comments, p. 2.

¹⁰⁷ Meighan Comments, p. 3.

¹⁰⁸ Meighan Comments, p. 3.

create a significant impact at 310 feet away, assuming the vibration peak is below 30 Hz.¹⁰⁹ This is a new significant impact not previously analyzed in the 2017 EIR which requires analysis and mitigation in a revised SEIR.

Mr. Meighan proposed feasible mitigation to reduce significant vibration impacts, including coordination between the studio's recording schedules and high-vibration construction activities within a certain buffer zone.¹¹⁰ These feasible measures should be included in a revised SEIR before the Project can be approved.

B. The Project Results in Significant Unmitigated Construction Noise Which is More Severe than the 2017 Project

The DSEIR concludes that construction noise impacts would be significant at Receptors 1, 2, and 3, but would be effectively mitigated by measures proposed in the DSEIR and the State-certified EIR.¹¹¹ However, substantial evidence in Mr. Meighan's comments demonstrates that the measures will not effectively reduce construction noise impacts to less than significant levels.¹¹² Mr. Meighan's comments demonstrate that each of the mitigation measures are not guaranteed to reduce noise levels below impact thresholds.¹¹³

First, Mitigation Measure ES/VCC-MM-NOI-1 requires the use of mufflers in all construction equipment, would not reduce noise because most equipment is already muffled, according to Mr. Meighan.¹¹⁴ Mr. Meighan's comments explain that virtually all construction equipment is fit with mufflers, so the referenced sound levels already account for the noise reduction these mufflers provide, and the additional reductions are unsupported.¹¹⁵ Therefore, mufflers would not result in further reductions to construction noise.¹¹⁶

Second, the DSEIR states that the "anticipated noise reduction benefits of [Mitigation Measure] ES/VCC-MM-NOI-2 and ES/VCC-MM-NOI-4 are not taken into account for purposes of this analysis."¹¹⁷ While mitigation measure NOI-2, a

¹⁰⁹ Meighan Comments, p. 3.

¹¹⁰ Meighan Comments, p. 3.

¹¹¹ DSEIR, p. 5.8-36.

¹¹² Meighan Comments, p. 4.

¹¹³ Meighan Comments, p. 2.

¹¹⁴ *Id.*

¹¹⁵ *Id.*

¹¹⁶ *Id.*

¹¹⁷ DSEIR, p. 5.8-53.

logical arrangement of construction staging and reduction of idling, and mitigation measure NOI-4, a clear channel of communication between the contractor and community, can be good noise-reducing measures, neither would reduce worst-case scenarios of necessary construction closest to sensitive receivers.¹¹⁸ Therefore, these measures do not support the DSEIR's determination that "the County's stationary construction noise standards would not be exceeded by the Modified Project with mitigation,"¹¹⁹ because the mitigation measures are illusory.

Third, the DSEIR proposed Mitigation Measure ES/VCC-MM-NOI-3 which provides that a noise barrier is to be constructed to the north of the Valencia Commerce Center Planning Area project site.¹²⁰ However, the DSEIR fails to disclose the level of noise reduction it is expected to provide. This noise barrier would only reduce noise directly to the north of the Valencia Commerce Center project but would not adequately mitigate impacts to sensitive receptors along the south and east sides. The nearest existing noise sensitive receptors are the Travel Village RV Park, and the Higher Vision Church.¹²¹ The noise barrier to the north of the project site would not effectively mitigate significant construction noise impacts to sensitive receptors at either the Travel Village RV Park to the southwest or the Higher Vision Church to the southeast of the Valencia Commerce Center Planning Area project site.¹²²

The above mitigation measures do not effectively reduce construction noise impacts to less than significant levels, as demonstrated in Mr. Meighan's comments.¹²³ The measures do not mitigate impacts to all affected receivers and do not apply to worst case scenario noise impacts.¹²⁴ Further, the imagined reductions in construction noise impacts detailed in the DSEIR are based on erroneous reduction assumptions on unmuffled source levels.¹²⁵ As such, the Project will have significant construction noise impacts not analyzed, disclosed or mitigated in the State-certified EIR. The Project's significant unmitigated construction noise impacts must be analyzed in a revised SEIR before the Project can be approved.

¹¹⁸ Meighan Comments, p. 4.

¹¹⁹ DSEIR, p. 5.8-53.

¹²⁰ DSEIR, p. 5.8-51.

¹²¹ DSEIR, p. 5.8-21.

¹²² Meighan Comments, p. 4.

¹²³ Meighan Comments, p. 4.

¹²⁴ Meighan Comments, p. 4.

¹²⁵ Meighan Comments, p. 4.

VII. THE COUNTY CANNOT MAKE THE NECESSARY FINDINGS TO APPROVE THE PROJECT'S ENTITLEMENTS

In order to approve a Vesting Tentative Tract Map, the County must find that the Project is consistent with the General Plan.¹²⁶ Here, the County does not have substantial evidence to demonstrate conformance with the General Plan given the Project's significant inconsistency with General Plan Policies AQ 1.3, N 1.1 and N 1.3.

A. The DSEIR Fails to Analyze the Project's Inconsistency with the General Plan Noise Element

The Project's failure to adequately mitigate adverse noise impacts to nearby sensitive receptors at the Travel Village RV Park and the Higher Vision Church is a violation of the General Plan Policy N 1.1. General Plan Policy N 1.1 requires that the County "[u]tilize land uses to buffer noise-sensitive uses from sources of adverse noise impacts."¹²⁷ Moreover, the failure to mitigate adverse construction and vibration impacts to Travel Village RV Park and the Higher Vision Church is a violation of General Plan Policy N 1.3 which provides that the County must "[m]inimize impacts to noise-sensitive land uses by ensuring adequate site design, acoustical construction, and use of barriers, berms, or additional engineering controls through Best Available Control technologies."¹²⁸ The DSEIR's failure to include adequate buffering for detrimental noise impacts to Travel Village RV Park and the Higher Vision Church is a dereliction of the County's duty to minimize impacts to noise sensitive land uses pursuant to General Plan Policy N 1.3.¹²⁹

B. The DSEIR Fails to Analyze the Project's Inconsistency with the General Plan Air Quality Element

General Plan Policy AQ 1.3 requires the County to "Reduce particulate inorganic and biological emissions from construction, grading, excavation, and demolition to the maximum extent feasible."¹³⁰ The DSEIR fails to analyze the Project's consistency with the General Plan's Air Quality Element and General Plan Policy AQ 1.3. Substantial evidence above and in the expert consultant reports

¹²⁶ Government Code section 66473.5.

¹²⁷ DSEIR, p. 5.8-13.

¹²⁸ DSEIR, p. 5.8-13.

¹²⁹ *Id.*

¹³⁰ Los Angeles County, General Plan Chapter 8: Air Quality Element, p. 121.

attached hereto demonstrate that the Project does not reduce particulate matter emissions to the greatest extent feasible, and additional mitigation is required to reduce significant health risk impacts from diesel particulate matter emissions associated with mobile sources, project construction, and project operation. The DSEIR must be revised and recirculated to adequately analyze the Project's inconsistency with General Plan Policy AQ 1.3 and mitigate the Project's significant health risk impacts associated with DPM emissions.

Given the Project's inconsistency with the General Plan Policies AQ 1.3, N 1.1, and N 1.3, the County cannot make the necessary findings to approve the Project's entitlements.

The County cannot approve the Vesting Tentative Tract Map absent additional mitigation reducing significant health risk and noise impacts.

In order to approve the Project's required Zone Change, the County is required to make the following findings:

1. Modified conditions warrant a revision in the Zoning Map as it pertains to the area or district under consideration.
2. A need for the proposed zone classification exists within such area or district.
3. The particular property under consideration is a proper location for said zone classification within such area or district.
4. The zone classification at such location will be in the interest of public health, safety and general welfare.
5. The Zone Change is consistent with the General Plan.
6. If the Zone Change will permit any uses prohibited by the existing zoning, that such Zone Change will not result in a need for a greater water supply for adequate fire protection or that the existing and proposed sources of water will provide an adequate water supply.¹³¹

¹³¹ County of Los Angeles Code Section 22.198.050.

Given the Project's inconsistency with General Plan Policies N 1.1 and N 1.3, the Project is not consistent with the General Plan and the County cannot make the necessary findings to approve the Zone Change.

In order to approve a Conditional Use Permit, the County must make the following findings:

- 1) The proposed use will be consistent with the adopted General Plan for the area.
- 2) The requested use at the location proposed will not:
 - a. Adversely affect the health, peace, comfort, or welfare of persons residing or working in the surrounding area;
 - b. Be materially detrimental to the use, enjoyment, or valuation of property of other persons located in the vicinity of the site; and
 - c. Jeopardize, endanger, or otherwise constitute a menace to the public health, safety, or general welfare.
- 3) The proposed site is adequate in size and shape to accommodate the yards, walls, fences, parking and loading facilities, landscaping, and other development features prescribed in this Title 22, or as is otherwise required to integrate said use with the uses in the surrounding area.
- 4) The proposed site is adequately served:
 - a. By highways or streets improved as necessary to shorten trip length and reduce vehicle miles traveled for the kind and quantity of traffic such use would generate; and
 - b. By other public or private service facilities as are required.¹³²

Here, substantial evidence in CREED LA's comments and those of our expert consultant demonstrate that the Project will "adversely affect the health, peace, comfort, or welfare of persons residing or working in the surrounding area" in violation of Municipal Code Section 22.158.050 subdivision B(2)(a). Moreover, due to the Project's inconsistency with the General Plan Policy AQ 1.3, N 1.1 and 1.3, the County cannot make the necessary findings to approve the Conditional Use Permit.

¹³² County of Los Angeles Code Section 22.158.050.

In order to approve a Development Agreement, the County is required to make the following findings:

- a. The proposed Development Agreement is consistent with the General Plan and any applicable Community, Area, or Specific Plan.
- b. The proposed Development Agreement complies with zoning, subdivision, and other applicable ordinances and regulations.
- c. The proposed Development Agreement is consistent with the public safety, welfare, and convenience, making it in the public interest to enter into the Development Agreement with the applicant.
- d. The proposed Development Agreement will not:
 - i. Adversely affect the health, peace, comfort, or welfare of persons residing or working in the surrounding area;
 - ii. Be materially detrimental to the use, enjoyment, or valuation of property of other persons located in the vicinity of the site; or
 - iii. Jeopardize, endanger, or otherwise constitute a menace to the public health, safety, or general welfare.¹³³

Here, the Project is inconsistent with the General Plan and would be materially detrimental to the use, enjoyment of property of other persons located in the vicinity of the site given the Project's significant air quality, health risk, noise, and vibration impacts. Moreover, the Project may jeopardize the public health, safety and general welfare due to the Project's significant health risk associated with diesel particulate matter emissions. The County, therefore, cannot make the necessary findings to approve the Project's Development Agreement, absent substantial additional analysis and mitigation in a revised SEIR circulated for public review and scrutiny.

VIII. CONCLUSION

For all of the reasons discussed above, the DSEIR for the Project remains wholly inadequate under CEQA. It must be thoroughly revised to provide analysis of, and mitigation for, all of the Project's significant impacts. These revisions will necessarily require that the DSEIR be recirculated for public review. Until the

¹³³ County of Los Angeles Code Section 22.162.040.

February 18, 2025
Page 29

DEIR has been revised and recirculated, as described herein, the County may not lawfully approve the Project.

Thank you for your consideration of these comments. Please include them in the record of proceedings for the Project.

Sincerely,



Kelilah D. Federman

Attachments
KDF:acp

EXHIBIT A



GROUP DELTA

Adams Broadwell Joseph Cardozo
601 Gateway Blvd. Suite 1000
South San Francisco, CA 94080

February 4, 2025
Proposal No. ENXXXX

Attention: Kelilah Federman

Subject: Comments on Entrada South and Valencia Commerce Center Project (ESVCCP) Draft Supplemental Environmental Impact Report (DSEIR) Los Angeles County, California

Dear Ms. Kelilah,

Group Delta Consultants, Inc. (Group Delta, Dr. Komal Shukla) is pleased to present Adams Broadwell Joseph & Cardozo (ABJC, Client) with a comprehensive technical review of the Draft Supplemental Environmental Impact Report (DSEIR) for the Entrada South and Valencia Commerce Center Project (ESVCCP or Project). The ESVCCP is proposed for development in northwestern Los Angeles County, west of Interstate 5 (I-5) and adjacent to the City of Santa Clarita. The Project encompasses two primary planning areas: the Entrada South Planning Area (ESPA) and the Valencia Commerce Center (VCC) Planning Area.

1. Introduction

The ESPA consists of approximately 382.3 acres located west of I-5 and The Old Road, primarily south of Six Flags Magic Mountain. The site is currently characterized by vacant land interspersed with abandoned oil wells, access roads, and infrastructure, including the recently completed extension of Magic Mountain Parkway, which traverses the site in an east-west orientation.

Key infrastructure elements within the ESPA include:¹

- Southern California Edison (SCE) high-voltage transmission lines and towers
- A 34-inch high-pressure natural gas transmission pipeline operated by Southern California Gas Company, located along the southern boundary
- Potential smaller-diameter pipelines associated with historic oil field operations

¹ Refer to Para 1. On Pg. 3.0-2 of Entrada South and VCC Project Draft SEIR/SCH No. 2000011025, 3.0 Project Description, Los Angeles County, Dec 2024

The ESPA exhibits considerable topographic variation, with elevations ranging from approximately 1,000 to 1,400 feet above mean sea level (MSL). The site also contains portions of four primary drainage courses:²

- Magic Mountain Canyon
- Unnamed Canyon 1
- Unnamed Canyon 2
- Unnamed Canyon 3

Several of these drainage courses have undergone modification, including channelization and storm drain enclosures.

The proposed development within the ESPA includes:³

- 730,000 square feet of non-residential space
- 1,574 residential units

The VCC Planning Area encompasses approximately 328.5 acres within the partially developed Valencia Commerce Center, west of I-5 and north of State Route 126 (SR-126).⁴ The proposed development within this area consists of 3.4 million square feet of non-residential buildings.⁵

2. Project Description

The Entrada South and Valencia Commerce Center (VCC) Project Site is situated within the planning area of the Newhall Ranch Resource Management and Development Plan and Spineflower Conservation Plan (RMDP/SCP). This plan, approved by the California Department of Fish and Wildlife (CDFW) in 2017, provides a framework for conservation, mitigation, and permitting within the Santa Clara River watershed and its associated tributaries.

The State-certified Environmental Impact Report (EIR) (SCH No. 2000011025), along with subsequent environmental evaluations, assessed the Project's impacts within the broader scope of the RMDP/SCP. The RMDP/SCP includes:⁶

² *Ibid*

³ Refer to Table 3.0-1. On Pg. 3.0-3 of Entrada South and VCC Project Draft SEIR/SCH No. 2000011025, 3.0 Project Description, Los Angeles County, Dec 2024

⁴ Refer to Para 2. On Pg. 3.0-8 of Entrada South and VCC Project Draft SEIR/SCH No. 2000011025, 3.0 Project Description, Los Angeles County, Dec 2024

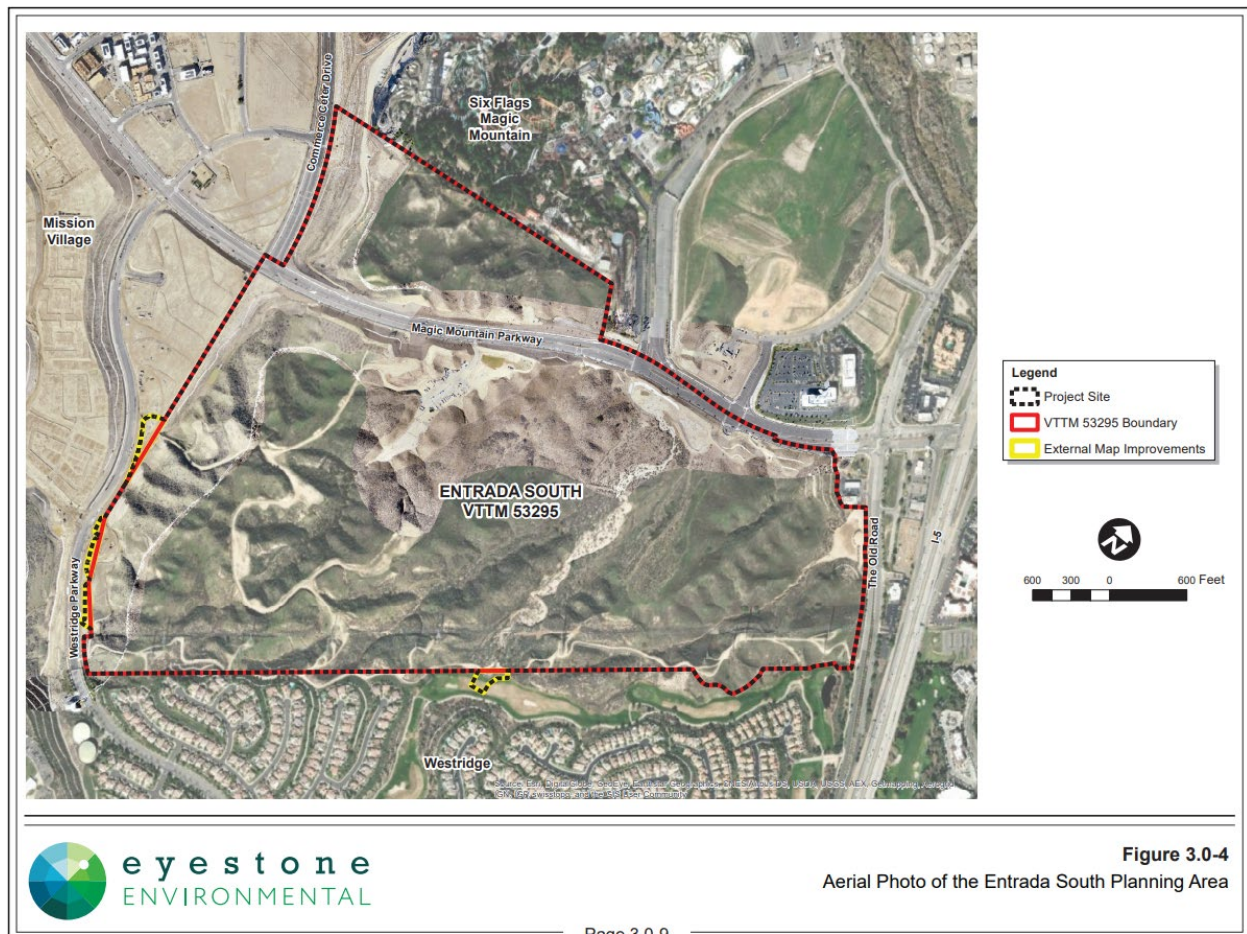
⁵ *Ibid*

⁶ Refer to Para 2-4 On Pg. 3.0-17 – 3.0-18 of Entrada South and VCC Project Draft SEIR/SCH No. 2000011025, 3.0 Project Description, Los Angeles County, Dec 2024

- A long-term Clean Water Act Section 404 permit for jurisdictional impacts
- The Spineflower Conservation Plan (SCP), which designates preserves for the federally endangered San Fernando Valley Spineflower
- A dedicated 27.2-acre Entrada South Spineflower Preserve for habitat protection

The Project aligns with the Los Angeles County Area Plan, which guides land use, development, and infrastructure planning for unincorporated areas within the Santa Clarita Valley. The 2012-adopted Area Plan anticipates population growth to 272,000 residents and promotes an integrated approach to residential, commercial, and open space development.⁷

Furthermore, the RMDP/SCP incorporates critical infrastructure planning, including the Magic Mountain Parkway extension, which enhances regional connectivity and facilitates access to Entrada South, Mission Village, and other planned developments.



⁷ Refer to Para 1. On Pg. 3.0-12 of Entrada South and VCC Project Draft SEIR/SCH No. 2000011025, 3.0 Project Description, Los Angeles County, Dec 2024

Figure 1: Aerial Photo of the Entrada South Planning Area

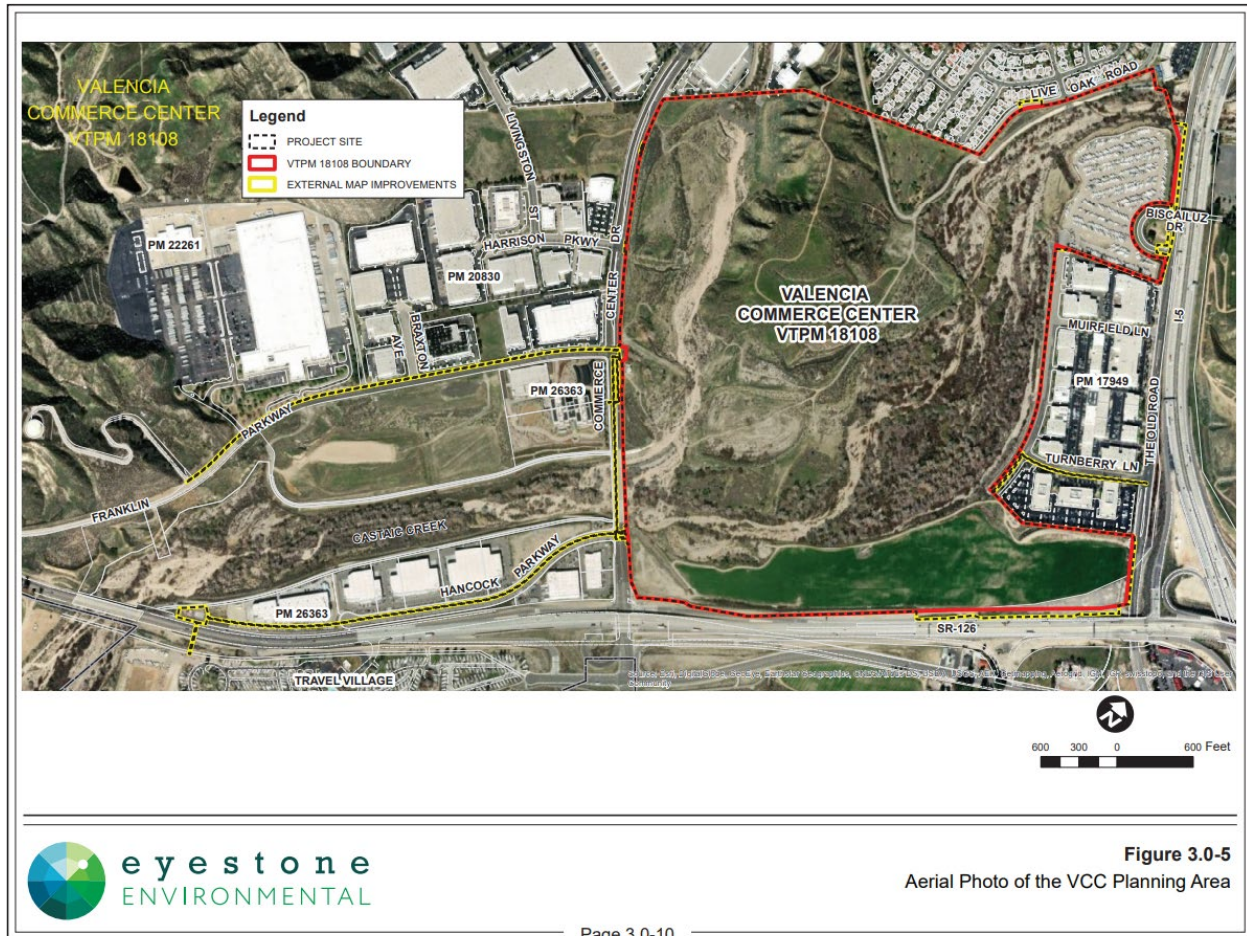


Figure 2: Aerial Photo of the VCC Planning Area

Entrada South Planning Area (ESPA)

As seen in Figures 3 and 4, the ESPA encompasses 730,000 square feet of commercial development and 1,574 residential units, in alignment with the State-certified Environmental Impact Report (EIR). The key components of the ESPA include:⁸

- Spineflower Preserve: A 27.2-acre conservation area located in the southeastern portion of the site, permanently designated for the protection and preservation of the San Fernando Valley spineflower.

⁸ Refer to Section d. on Pg. 3.0-19 – 3.0-24 of Entrada South and VCC Project Draft SEIR/SCH No. 2000011025, 3.0 Project Description, Los Angeles County, Dec 2024

- **Recreational and Community Amenities:** Development includes a 5.4-acre neighborhood park, potential school site, 8,430 square feet of recreation facilities, and 140.4 acres of open space.
- **Residential and Commercial Development:** The area north of Magic Mountain Parkway is designated for commercial and office development. In contrast, the southern and central portions of the site will comprise a diverse mix of multi-family and single-family residential units with building heights varying between 32 and 55 feet.
- **Environmental Enhancements:** Restoration of drainage channels and the expansion of open space to protect biological resources and jurisdictional waters.

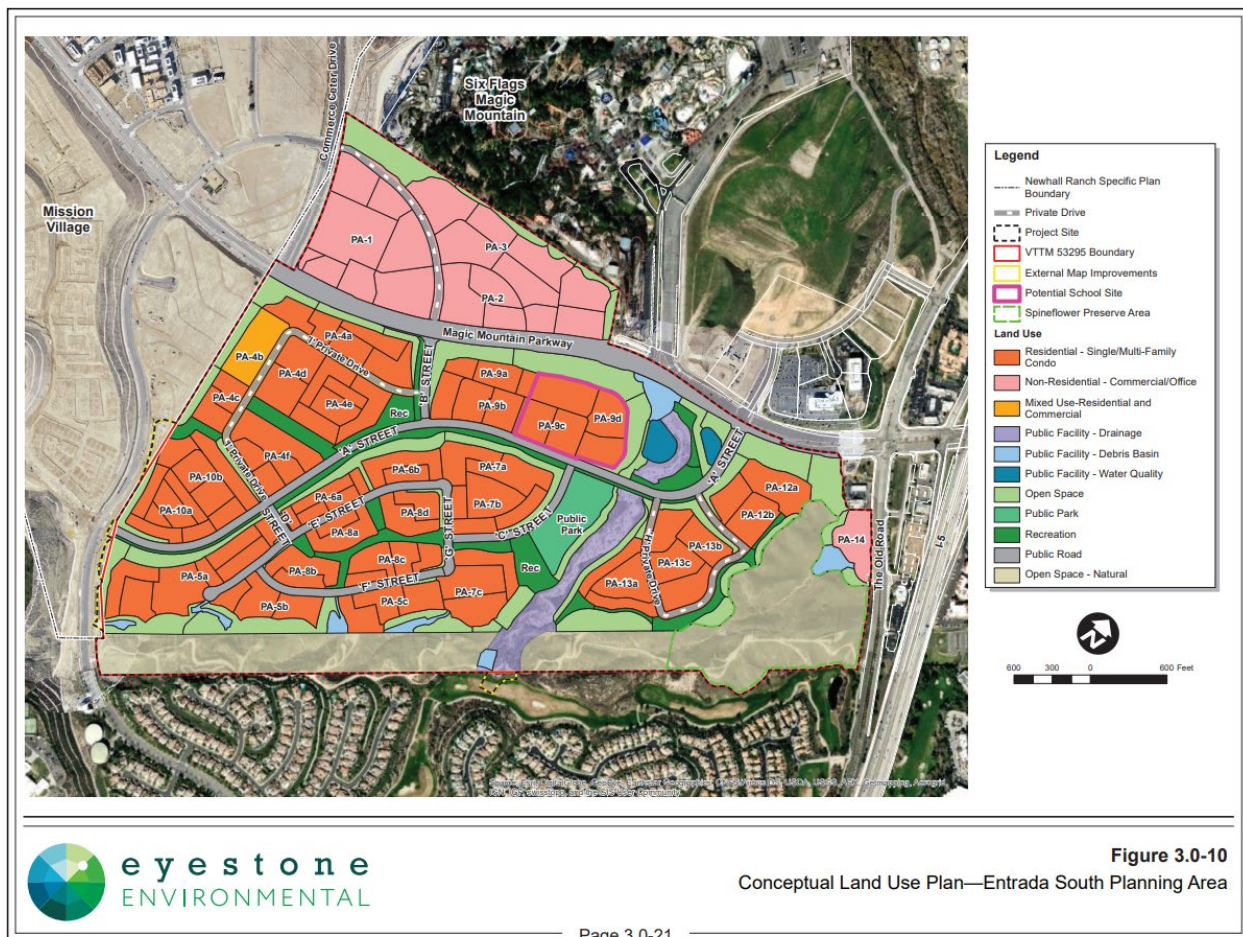


Figure 3: Conceptual Land Use Plan – Entrada South Planning Area

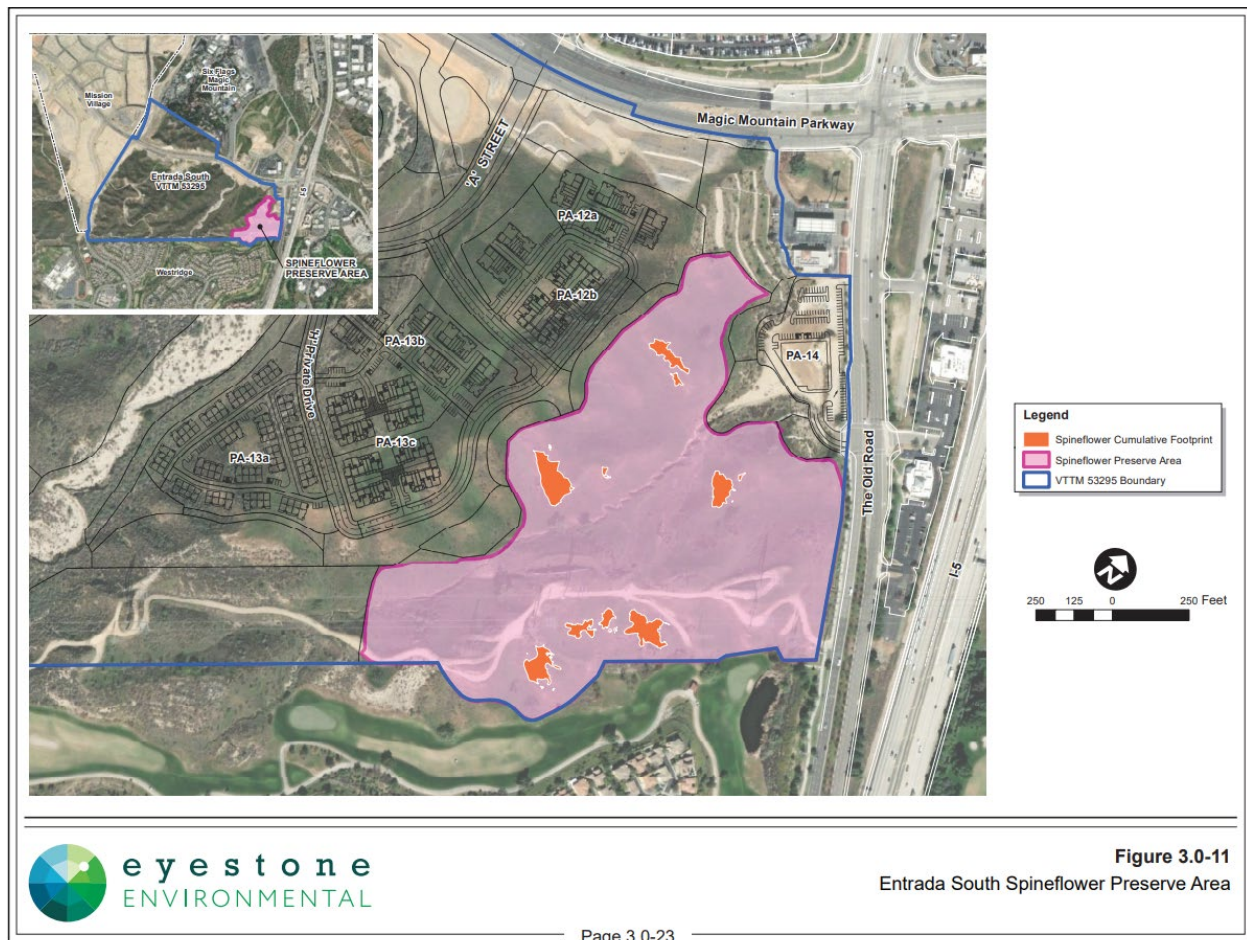


Figure 4: Entrada South Spineflower Preserve Area

Valencia Commerce Center (VCC)

As shown in Figure 5, the VCC Planning Area is designated as Industrial Office (IO) and will encompass 3.4 million square feet of development. The revised Project design will:⁹

- Minimize permanent impacts to Hasley Creek and Castaic Creek by restoring and revegetating wetlands and preserving additional streambed habitat.
- Enhance flood protection systems while expanding open space to provide significant environmental benefits.

⁹ Refer to Section e. On Pg. 3.0-28 – 3.0-30 of Entrada South and VCC Project Draft SEIR/SCH No. 2000011025, 3.0 Project Description, Los Angeles County, Dec 2024

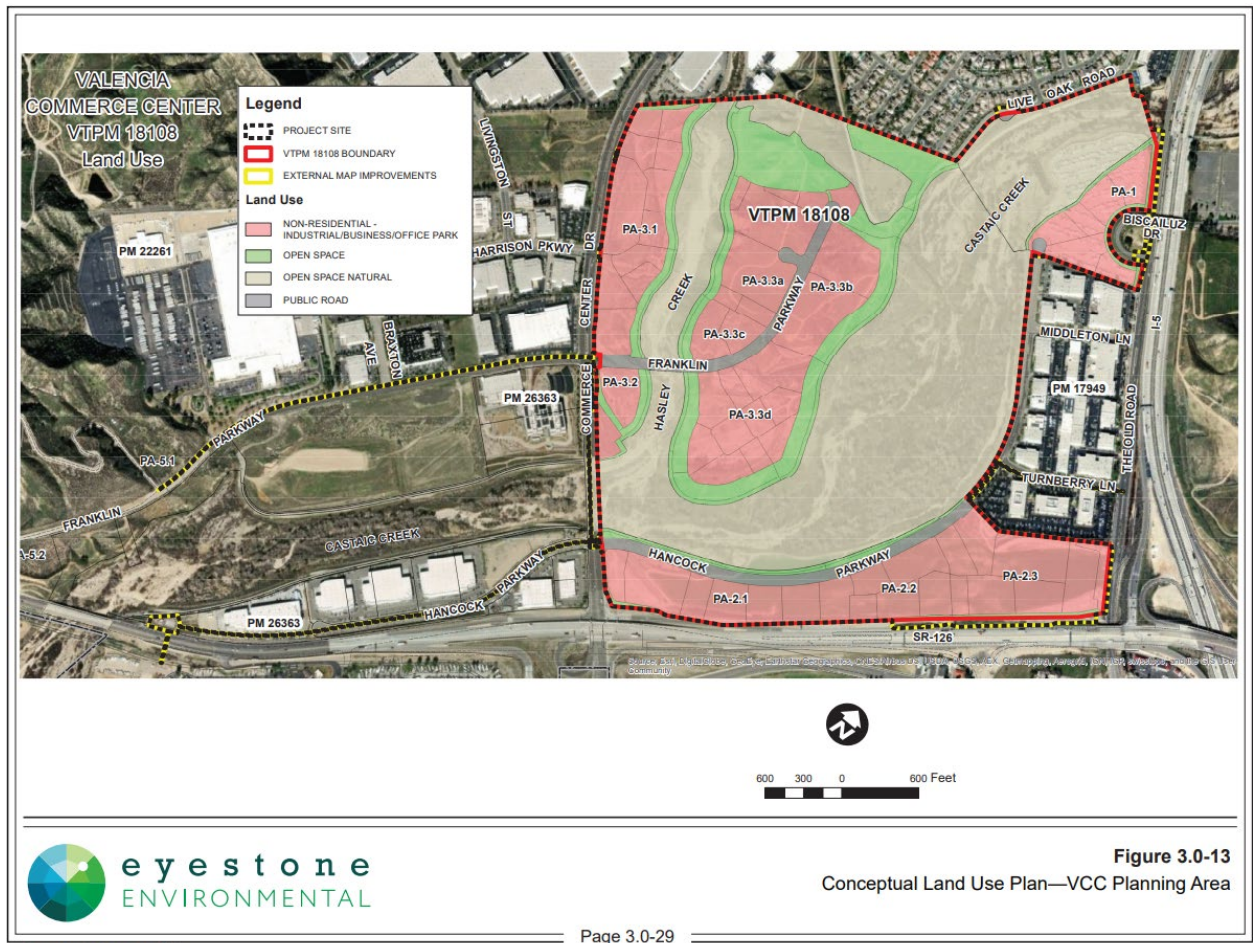


Figure 5: Conceptual Land Use Plan – VCC Planning Area

3. Deficiencies in Emissions Modeling and Lack of Transparency in the DSEIR

The DSEIR fails to include the CalEEMod output files for mitigated operational emissions as well as the output files for construction-related emissions associated with the revised Project design. Additionally, the DSEIR lacks detailed specifications used for modeling the emissions inventory, making it difficult to accurately quantify the Project's air quality impacts and evaluate its compliance with regulatory standards.

3.1 Lack of Sufficient Evidence for Emission Reductions and Equipment Specifications in the DSEIR

While the DSEIR asserts that emissions reductions will be achieved through the utilization of higher-tier equipment, it does not provide sufficient documentation to verify the actual implementation or the efficacy of these reductions. The absence of these key CalEEMod files hampers the ability to independently assess the completeness and accuracy of the emissions estimates, raising concerns about the robustness of the modeling results. Without access to a

comprehensive set of emissions data, the potential for underestimating diesel particulate matter (DPM) emissions is heightened, leading to the possibility of overlooking significant health risks, especially to sensitive receptors.

Additionally, the Project utilized CARB's ORION database to assess equipment horsepower ratings but failed to disclose the specific horsepower values and the number of equipment used. This omission introduces substantial uncertainty into the emissions modeling process, as equipment horsepower directly correlates with fuel consumption and pollutant emissions. Higher horsepower engines inherently generate more emissions, and without disclosing these specifications, it is impossible to accurately quantify the project's energy demand and associated air quality impacts. Moreover, failing to account for the precise number of equipment units used in each construction phase creates the potential for emissions estimates to be either overstated or understated, further undermining the accuracy of the air quality impact assessment.

Construction Phase ¹	Equipment Type ¹	HP ²	State-Certified EIR Emissions (2011 SCAB Composite) ^{1,3,4} (g/bhp-hr)				Current Analysis Emission Factors (Tier 3 + DPF by Average HP) ⁴ (g/bhp-hr)				Percent Change in Emission Rates ⁵ (%)			
			ROG	CO	NO _x	PM ₁₀	ROG	CO	NO _x	PM ₁₀	ROG	CO	NO _x	PM ₁₀
Grading - Direct	Crawler Tractors	212	0.38	1.33	2.79	0.172	0.12	2.60	2.32	0.013	-68%	96%	-17%	-92%
	Crushing/Proc. Equipment	38	2.39	8.40	16.08	1.050	0.29	4.10	4.63	0.280	-88%	-51%	-71%	-73%
	Excavators	23	2.74	10.81	20.97	1.167	0.29	4.10	4.63	0.280	-89%	-62%	-78%	-76%
	Graders	188	0.39	1.50	3.23	0.170	0.12	2.60	2.32	0.013	-69%	74%	-28%	-92%
	Water Trucks (Other Material Handling Equipment)	167	0.45	1.44	4.11	0.180	0.12	3.70	2.32	0.017	-73%	157%	-44%	-91%
	Off-Highway Trucks	403	0.26	0.79	2.47	0.089	0.12	2.60	2.32	0.013	-55%	230%	-6%	-85%
	Rollers	12	4.20	15.78	27.87	1.979	0.29	4.10	4.63	0.280	-93%	-74%	-83%	-86%
	Rubber Tired Dozers	249	0.59	2.42	5.16	0.220	0.12	2.60	2.32	0.013	-80%	8%	-55%	-94%
	Rubber Tired Loaders	25	2.46	9.00	19.54	1.103	0.29	4.10	4.63	0.280	-88%	-54%	-76%	-75%
	Scrapers	367	0.38	1.44	3.38	0.145	0.12	2.60	2.32	0.013	-68%	80%	-31%	-91%

Notes:

¹ Construction phases and equipment mix are consistent with the RMDP-SCP Final EIS/EIR (June 2010) assumptions for Valencia Commerce Center and Entrada Direct Grading. See Appendix 4.7a Construction Emissions: Grading and Improvements Emissions, Direct Emissions (Impact Sciences, 2008), PDF pg 8 and 30. Available at: <http://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=11306>. The SCAB fleet average emission factors are cited in the footnote on each of those pages.

² Average HP is not available for the SCAB composite emissions. Therefore, this is calculated based on CARB's OFFROAD2017 Orion v1.0.1 database. Available at: <https://www.arb.ca.gov/orion/>.

³ SCAB composite factors are consistent with the factors used in the State-certified EIR, with potential variations in average horsepower. Available at: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/off-road-mobile-source-emission-factors>. Accessed: September, 2019. Average horsepower by equipment type from OFFROAD2017 used to convert pounds per hour to grams per brakehorse power-hour.

⁴ CARB. Non-road Diesel Engine Certification Tier Chart. <https://ww2.arb.ca.gov/resources/documents/non-road-diesel-engine-certification-tier-chart>. Assumes an 85% reduction in PM emissions due to the DPF for equipment greater than 50 HP. This is conservative, as DPFs are likely to also reduce emissions from other pollutants.

⁵ Percent Decrease = (2011 EF - Tier 3 + DPF EF) / 2011 EF.

Table 1: Decrease in Emission Rates from Construction Off-Road Equipment – Phase 1

4. Health Risks of Diesel Particulate Matter from Construction Equipment

Construction equipment, including backup generators, is a significant source of diesel particulate matter (DPM), a toxic air contaminant (TAC) and a recognized human carcinogen.^{10,11} DPM consists of a complex mixture of ultrafine particulate matter (PM_{2.5}), volatile organic compounds (VOCs), polycyclic aromatic hydrocarbons (PAHs), and heavy metals generated from diesel engine combustion.¹² Due to its small aerodynamic diameter ($\leq 2.5 \mu\text{m}$), DPM can penetrate deep into

¹⁰ Cal/EPA OEHHA and American Lung Association of California, Health Effects of Diesel Exhaust; <https://oehha.ca.gov/media/downloads/calenviroscreen/indicators/diesel4-02.pdf>

¹¹ Cal/EPA OEHHA and American Lung Association of California, Appendix A: Hot Spots Unit Risk and Cancer Potency Values, p. 1 (DPM unit risk = 3 E-4); <https://oehha.ca.gov/media/CPFs042909.pdf>

¹² CARB, Diesel Exhaust & Health; [Overview: Diesel Exhaust & Health | California Air Resources Board](#)

the alveolar region of the lungs, where it can induce inflammation, oxidative stress, and DNA damage, leading to severe respiratory, cardiovascular, and carcinogenic effects.¹³

Similar to criteria air pollutants, toxic air contaminants (TACs) originate from stationary, areawide, and mobile emission sources, contributing to elevated regional and localized health risks, particularly in high-traffic corridors, industrial zones, and areas adjacent to major roadways. The ten most hazardous air toxics in California, as identified by the California Air Resources Board (CARB) and the Office of Environmental Health Hazard Assessment (OEHHA), include:^{14,15}

- Acetaldehyde
- Benzene
- 1,3-Butadiene
- Carbon tetrachloride
- Diesel particulate matter (DPM)
- Formaldehyde
- Hexavalent chromium
- Methylene chloride
- Para-dichlorobenzene
- Perchloroethylene

Among these, DPM poses the greatest statewide cancer risk, accounting for approximately 70% of the known cancer risk from outdoor air toxics.

The Office of Environmental Health Hazard Assessment (OEHHA) has determined that exposure to diesel exhaust can result in immediate adverse health effects. Prolonged exposure to DPM is associated with severe acute and chronic health effects, including:¹⁶

- **Respiratory diseases:** Exacerbation of asthma, chronic bronchitis, and reduced lung function, particularly in children and elderly individuals.

¹³ OEHHA and the American Lung Association of California, Health Effects of Diesel Exhaust; <https://oehha.ca.gov/media/downloads/calenviroscreen/indicators/diesel4-02.pdf>

¹⁴ CARB, Diesel Exhaust & Health; [Overview: Diesel Exhaust & Health | California Air Resources Board](#)

¹⁵ Cal/EPA OEHHA and American Lung Association of California, Health Effects of Diesel Exhaust; <https://oehha.ca.gov/media/downloads/calenviroscreen/indicators/diesel4-02.pdf>

¹⁶ CARB, Fact Sheet: Diesel Particulate Matter Health Risk Assessment Study for the West Oakland Community: Preliminary Summary of Results, March 2008; <https://ww2.arb.ca.gov/sites/default/files/classic/ch/communities/ra/westoakland/documents/factsheet112508.pdf>

- **Cardiovascular effects:** Increased risk of heart attack, stroke, and hospitalizations due to systemic inflammation and oxidative stress.
- **Carcinogenicity:** DPM is classified as a known human carcinogen by CARB, OEHHA, and the International Agency for Research on Cancer (IARC), with long-term inhalation exposure linked to increased incidence of lung cancer.
- **Developmental and neurological impairments:** Emerging evidence suggests that ultrafine diesel particles may contribute to neurodevelopmental disorders and cognitive decline.
- **Premature mortality:** Elevated levels of ambient PM2.5, including DPM, are directly associated with increased premature death rates, particularly among individuals with preexisting cardiovascular and pulmonary conditions.

Given the well-established health risks associated with diesel particulate matter (DPM), including its role as a human carcinogen and its significant contribution to respiratory, cardiovascular, and developmental issues, it is imperative that a comprehensive health risk assessment (HRA) be conducted for the proposed project. The construction phase, in particular, represents a significant source of DPM emissions, which can be exacerbated by proximity to sensitive receptors such as residents, workers, and nearby communities. As the DSEIR fails to provide a detailed evaluation of the potential health impacts from DPM exposure, particularly during the extended construction period, there remains considerable uncertainty regarding the true scope of health risks.

The Project's DSEIR fails to include adequate analysis and mitigation for the Project's significant construction phase backup generator usage. The DSEIR's conclusion that impacts are less than significant is therefore unsupported.

The DSEIR also fails to account for the impact of backup generators used during Project operations. Back-up generators are a reasonably foreseeable consequence of the Project due to increasingly common Public Safety Power Shutoff ("PSPS") events and extreme heat events. Extreme heat events ("EHE") are defined as periods where in the temperatures throughout California exceed 100 degrees Fahrenheit.¹⁷ From January 2019 through December 2019, Southern California Edison reported 158 of their circuits underwent a PSP event.¹⁸ In Los Angeles County, two circuits had 4 PSPS events during that period, lasting an average of 35 to 38 hours. The total duration of the PSPS events lasted between 141 hours to 154 hours in 2019. According

¹⁷ Governor of California. 2021. Proclamation of a state of emergency. June 17, 2021.

¹⁸ SCAQMD. 2020. Proposed Amendment To Rules (PARS) 1110.2, 1470, and 1472. Dated December 10, 2020. http://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1110.2/1110-2_1470_1472/par1110-2_1470_wgm_121020.pdf?sfvrsn=6.

to the California Public Utilities Commission (CPUC) de-energization report¹⁹ in October 2019, there were almost 806 PSPS events that impacted almost 973,000 customers (~7.5% of households in California) of which ~854,000 of them were residential customers. The California Air Resources Board estimates that with 973,000 customers impacted by PSPS events in October 2019, approximately 125,000 back-up generators were used by customers to provide electricity during power outage.²⁰ The widespread use of back-up generators to adapt to PSPS and EHE events suggests that back-up generators are a reasonably foreseeable consequence of the Project. The DSEIR failed to account for the use of back-up generators during Project operations.

5. Absence of Health Risk Assessment

The South Coast Air Quality Management District recommended that the County perform a mobile source health risk assessment to disclose the potential health risks due to the Project's close proximity to Interstate 5. No health risk assessment was prepared.

The State-certified EIR concluded that the health risks associated with construction-related emissions – both cancer and non-cancer risks – would be less than significant.²¹ The Project's cancer risks are more severe than the 2017 Project because the State-certified EIR did not account for the Project's significant backup generator and DPM emissions.

The DSEIR argues that the implementation of air quality mitigation measures — RMDP/SCP-AQ-1, RMDP-SCP-AQ-3 through RMDP-SCP-AQ-7, RMDP-SCP-AQ-10, and RMDP-AQ-11—would sufficiently reduce health risk impacts.²² These measures are insufficient to reduce the Project's significant cancer and health risk.

The DSEIR fails to incorporate a comprehensive health risk assessment for either the construction or operational phases of the Project, despite the South Coast Air Quality Management District (SCAQMD) explicitly recommending such a health risk assessment be prepared.²³ Instead, the DSEIR asserts—without providing quantitative substantiation—that emission reductions render air quality impacts less than significant, thereby reducing associated health risks.²⁴

¹⁹ <https://www.cpuc.ca.gov/deenergization/> as cited in CARB, 2020. Potential Emission Impact of Public Safety Power Shutoff (PSPS), Emission Impact: Additional Generator Usage associated With Power Outage..

²⁰ California Air Resources Board, Emission Impact: Additional Generator Usage Associated with Power Outage (January 30, 2020), available at <https://ww2.arb.ca.gov/resources/documents/emissions-impact-generator-usage-during-psps>.

²¹ DSEIR, p. 5.1-36.

²² Refer to Section 1.5 On Pg. 5 of 05.01 Air Quality Technical Report Entrada South and Valencia Commerce Center, Los Angeles County

²³ SCAQMD, Notice of Preparation of a Draft Supplemental Environmental Impact Report for the Proposed Entrada South and Valencia Commerce Center Project (SCH No:2000011025), Nov 2021; [LAC211102-01 NOP Entrada South and Valencia Commerce Center Project](#)

²⁴ Refer to Section 4.3 On Pg. 37 of 5.01 Air Quality Technical Report Entrada South and Valencia Commerce Center, Los Angeles County

The Project site is in close proximity to I-5 and a high-traffic amusement park, significantly increasing the likelihood of chronic and acute exposure to diesel particulate matter (DPM) and other hazardous air pollutants (HAPs). Additionally, the development plan includes 1,574 residential units and 382.3 acres of nonresidential structures, placing future residents, workers, and other sensitive receptors at heightened risk of exposure to toxic air contaminants (TACs), particularly DPM.

The California Environmental Quality Act (CEQA) mandates that agencies identify, disclose, and mitigate significant environmental health impacts, including those posed by hazardous air pollutants (HAPs) such as DPM. Despite the well-documented acute and chronic health risks of DPM exposure, the DSEIR fails to incorporate a construction-phase health risk assessment. This omission is particularly concerning given that construction workers are among the most vulnerable receptors due to their proximity to diesel exhaust sources. In addition, workers at adjacent commercial establishments and nearby residents are also at risk due to localized dispersion of DPM emissions.

Furthermore, the Project's construction emissions are anticipated to last for eight years, yet the DSEIR does not provide quantitative construction emissions data.

Given that the Project is a significant source of DPM, a health risk assessment must be prepared. By omitting a quantitative health risk assessment for the construction-phase, the Project fails to meet CEQA's disclosure and mitigation requirements, placing construction workers and nearby receptors at elevated and unassessed health risks.²⁵

6. Mitigation Measure for Reducing Diesel Particulate Matter Emissions

The DSEIR acknowledges that "air quality impacts are significant when viewed in connection with the effects of other past, present, and reasonably foreseeable future projects" and that the cumulative air quality impacts are significant and unavoidable.²⁶ However, the DSEIR fails to adequately assess the cumulative environmental impacts resulting from the construction of residential and non-residential developments within 1,500 feet of a major amusement park. Expansions or increased activities at the park, in conjunction with the proposed developments, could lead to significant cumulative air quality impacts, exacerbating exposure to DPM and other pollutants.

²⁵ U.S. EPA, Final Rule for Control of Emissions of Air Pollution From Nonroad Diesel Engines; <https://www.epa.gov/regulations-emissions-vehicles-and-engines/final-rule-control-emissions-air-pollution-nonroad-0>

²⁶ Refer to Section 4.3 On Pg.42 of 5.01 Air Quality Technical Report Entrada South and Valencia Commerce Center, Los Angeles County

Moreover, the project's proximity to I-5, a major transportation corridor characterized by heavy traffic from semi-trucks, commuters, and tourists, further exacerbates local air quality concerns. The substantial volume of diesel emissions from buses, service vehicles, and construction equipment associated with park operations and development would significantly contribute to elevated levels of fine particulate matter in the vicinity. These emissions could elevate the already high concentrations of PM10 and PM2.5, pollutants for which the South Coast Air Basin is currently in nonattainment under both state and federal air quality standards.

To address the significant concerns related to DPM emissions from the construction phase of the project, it is essential to implement robust mitigation measures. The following measures should be considered to mitigate DPM emissions and protect public health:

1. **Idling Time Reduction to 2 Minutes:** While reducing idling time to 5 minutes can help mitigate some emissions, it is insufficient to address the substantial DPM emissions during construction, especially during prolonged idling periods. A reduction to 2 minutes is recommended, as this further limits the duration of unnecessary fuel combustion and particulate emissions. This practice can be enforced through monitoring and penalties for non-compliance. The implementation of this measure, in combination with the use of cleaner equipment, would significantly reduce the emissions of particulate matter during construction activities.²⁷
2. **Switching to Cleaner Fuels:** Utilizing low-sulfur diesel or alternative fuels such as compressed natural gas (CNG), electric, or hybrid equipment can further reduce emissions from construction activities. These alternative fuel sources produce fewer particulates and toxic pollutants than conventional diesel fuel, especially when applied to high-use construction equipment.²⁸
3. **Limiting the Use of Diesel-Powered Equipment During High-Pollution Days:** Implementing a restriction on the operation of diesel-powered construction equipment during days when air quality is forecasted to be poor can help mitigate temporary spikes in particulate pollution. This strategy can be informed by Air Quality Index (AQI) forecasts and help reduce the health risks associated with elevated exposure to DPM.

Given the substantial emissions from diesel-powered vehicles and construction equipment, it is imperative to conduct a comprehensive health risk assessment to evaluate the cancer and non-cancer health risks posed to sensitive receptors—residents, workers, and park visitors—due to exposure to DPM. The health risk assessment should account for cumulative exposure,

²⁷ U.S. EPA, Learn About Idling Reduction Technologies (IRTs) for Trucks and School Buses; <https://www.epa.gov/verified-diesel-tech/learn-about-idling-reduction-technologies-irts-trucks-and-school-buses>

²⁸ U.S. EPA, Final Rule for Control of Emissions of Air Pollution From Nonroad Diesel Engines; <https://www.epa.gov/regulations-emissions-vehicles-and-engines/final-rule-control-emissions-air-pollution-nonroad-0>

considering both the project's construction and operational phases, and evaluate potential impacts from other nearby sources of diesel emissions. This assessment is essential to fully understand the potential health risks and to determine appropriate mitigation measures to protect public health and comply with CEQA guidelines.

Conclusion

The expert review conclusively identifies significant deficiencies in the DSEIR, particularly in its failure to provide a comprehensive analysis of the modified project's potential health impacts. The report inadequately dismisses the likelihood of significant adverse effects resulting from the use of outdated methodologies and assumptions. Furthermore, the current DSEIR lacks sufficient, empirical evidence to substantiate its claims and to demonstrate compliance with established air quality standards. Given these shortcomings, the preparation of a health risk assessment is essential for understanding the potential public health impacts associated with the project, particularly if it moves forward without addressing the identified gaps in environmental analysis.

Sincerely,

GROUP DELTA CONSULTANTS, INC.



Dr. Komal Shukla
Technical Director – Air Quality



Education

Ph.D. in Photochemical Modeling of Air Pollution (Environmental Engineering), Indian Institute of Technology Delhi-IIT Delhi (Photochemical Modeling of Ground Level Ozone), Delhi, India; Visiting Ph.D. Student, Institute Fellow, Gees, University of Birmingham, UK; MPhil Environment and Sustainable Development, IESD, Banaras Hindu University, Varanasi, India; M.Sc. Environment Management, University School of Environment Management (Sustainable and Low Carbon Energy Plan for Delhi), Delhi, India; B.Sc Chemistry (with honors) in Chemistry, University of Delhi, India

Years of Experience: 7

Years with Group Delta: 1

Dr. Shukla has a Ph.D. in air quality and atmospheric phenomenon modeling, with a strong technical background in tropospheric chemistry, industrial and city level environmental solutions, regulatory and global model applications, trace gases and particulate matter impact on human health and climate, and observations data analytic. Dr. Shukla is an air quality emissions modeler with nearly a decade of technical and research experience. She served as an in-house lead in federal contract scientific projects supporting the EPA's mission. Related experience includes:

Litigation, Compliance, Environmental Justice, On-Road Emissions, Industrial Emissions, California: As Air Quality Modeling Scientist, Ms. Shukla completed two major projects, including: Project I: Source apportionment of ozone and particulate matter pollution using photochemical modeling techniques, and Project II: Transportation and near-road air quality and emissions projection.

Environment and Climate Change Canada (ECCC), Toronto, Canada: As Research Scientist (Air Quality Modeling and Compliance in Alberta), Ms. Shukla completed two significant projects, including: Project I: Developing a photo-chemical transport model to understand oil and sands region emissions in North America and Project II: Modeling applications in delineating chemistry of tropospheric tracers.

University of North Carolina, Institute of Environment, Chapel Hill, North Carolina: As Postdoctoral Research Associate (Air Quality – NYSERDA Led Air Quality Model Development, Ms. Shukla worked on critical projects including: Project I: Air quality modeling of various city level sources and health exposure sciences in New York City, - funded by NYSERDA and Project II: TRECH project (<https://www.hsph.harvard.edu/c-change/news/trechstudy/>) - Transportation, Equity, Climate & Health CMAQ based modeling of vehicular emission and policy assessment on the East Coast.

Indian Institute of Technology Delhi (IIT Delhi), Delhi, India: As Research Associate, Ms. Shukla worked on Project I: Quantification and contribution of paddy stubble burning emissions in Haryana to estimate PM2.5 concentrations in its surrounding cities and Delhi. Role: Modelling meteorology and PM2.5 for north India using WRF-chem and Project II: A Systems Approach to Air Pollution in Delhi (ASAAP) mobility grant funded by GCRF and NERC. Role: Monitored outdoor PM2.5 concentrations at two flyovers in Delhi and assessed pavement dwellers exposure to air pollution of PM2.5 near heavily trafficked roads to see impact on dwellers.

Various Technical Skills

Languages: T and C Shell-script, MATLAB, Fortran, Python, NCL, R, and NETCDF satellite data retrievals and analysis

Models: WRF-Chem, GEM-MACH, CMAQ, GCAM, CTOOLS, AERMOD, CALPUFF, ADMS, MOVES, InMAP and COBRA.



Photochemical pollutant and aerosol/dust modeling and urban air quality. Expertise in tropospheric chemistry, machine learning aided regression models, WRF-Chem/CMAQ (Chemical transport models), dispersion models.

Air Quality: CTOOLS/AERMOD/ADMS/R-LINE and satellite data assessment (OMI-AURA and MODIS). USEPA observation and meteorology handling, anthropogenic/energy emission inventory QA and preparation (MOVES), and impacts-benefits.

Select Research Papers:

- Shukla, K., Seppanen, C., Naess, B., Chang, C., Cooley, D., Maier, A., .. & Arunachalam, S. (2022). ZIP Code Level Estimation of Air Quality and Health Risk Due to Particulate Matter Pollution in New York City. *Environmental Science & Technology*.
- Shukla, K., Kumar, P., Mann, G. S., & Khare, M. (2020). Mapping spatial distribution of particulate matter using Kriging and Inverse Distance Weighting at supersites of megacity Delhi. *Sustainable cities and society*, 54, 101997.
- Shukla, K., Srivastava, P. K., Banerjee, T., & Aneja, V. P. (2017). Trend and variability of atmospheric ozone over middle Indo-Gangetic Plain: impacts of seasonality and precursor gases. *Environmental Science and Pollution Research*, 24(1), 164-179.
- Shukla, K., Dadheech, N., Kumar, P., & Khare, M. (2021). Regression-based flexible models for photochemical air pollutants in the national capital territory of megacity Delhi. *Chemosphere*, 272, 129611.
- Gulia, S., Khanna, I., Shukla, K., & Khare, M. (2020). Ambient air pollutant monitoring and analysis protocol for low- and middle-income countries: An element of comprehensive urban air quality management framework. *Atmospheric Environment*, 222, 117120.
- Khare, M., & Shukla, K. (2020). Outdoor and Indoor Air Pollutant Exposure. In *Environmental Pollutant Exposures and Public Health* (pp. 95-114)
- Kumar, G. S., Sharma, A., Shukla, K., & Nema, A. K. (2020). Dynamic programming-based decision-making model for selecting optimal air pollution control technologies for an urban setting. In *Smart Cities- Opportunities and Challenges* (pp. 709-729). Springer, Singapore.

Select Technical Conferences:

- Shukla, K., Ojha, N., & Khare, M., (2019) Air Quality Simulations over Delhi Using WRF-Chem in Conference of Indian Aerosol Science and Technology Association 2018 "Aerosol Impacts: Human Health to Climate Change" 2018 <http://cas.iitd.ac.in/iasta2018/pdf/>
- Shukla, K., Xiaoming, C., Ojha, N., & Khare, M., (2018), Air Quality Simulations over Delhi Using WRF-Chem: Effects of Local Pollution and Regional-Scale Transport , A42A-01 presented at 2018 Fall Meeting, AGU, Washington, D.C., 10-14 Dec. <http://abstractsearch.agu.org/meetings/2018/FM/A42A-01.htm1> (Talk)
- Shukla, K., & Khare M., (2019) Behaviour of Ground Level Ozone and Its Association with Precursors and Meteorology in Delhi, India, AS17-A023, *Atmospheric Chemistry in Highly Polluted Environments: Emissions, Fates, and Impacts*, AS17-A023 presented at 2019 16th Annual meeting AOGS, Singapore, 28th -2nd August (Poster)
- Shukla, K., Kumar, S., & Nema A., (2019) Environmental Characterization of Two Chromium-based Industrial Waste Contaminated Sites of India, accepted as B11H-2219, to be presented in presented at 2019 Fall Meeting, AGU, San Francisco, CA, USA 09-13 Dec. (Poster)
- Shukla, K., & Khare M., (2019), Behavioral Chemistry of ground level ozone formation in heavily polluted environment of Delhi city, accepted as A21G-2645, to be presented in presented at 2019 Fall Meeting, AGU, San Francisco, CA, USA 09-13 Dec.
- (Poster) Kumar, S., Sharma, A., Shukla K., Nema, A.K., (2019). Dynamic programming based decision-making model for selecting optimal air pollution control technologies for an urban setting. Presented at 1st smart cities conference, Delhi, India (Talk).

International Panelist

Air Pollution, Environmental Management and Policy Related Invited Talks:

- Minimizing air pollution in Delhi city, Pure Earth, NY, USA, Boston College, 2019
- Photochemical pollution in heavily polluted environments of India and China" in the Development of Traffic Pollution Dispersion Models based upon Artificial Intelligence Technology, Chang'an University, Xian, 2019, China
- Air Pollution Challenges and Mitigation Opportunities in Delhi, CADTIME, Newcastle University, 2019, UK
- Indoor Air Quality: Problems and Initiatives", 2nd Indian International National Conference on Air Quality Management (IICAQM 2017): Health and Exposure, Indian Institute of Technology Delhi, New Delhi 2017, India
- Tackling the Challenges of Air Pollution in India", Indian Institute of Public Administration, New Delhi, 2019, India

EXHIBIT B



WI #25-001.03

February 12th, 2025

Ms. Kelilah D. Federman
Adam Broadwell Joseph & Cardozo
601 Gateway Boulevard, Suite 1000
South San Francisco, CA 94080

**SUBJECT: Entrada South Planning Area DSEIR
Valencia, California
Review and Comment on Noise Study**

Dear Ms. Federman,

Per your request, Wilson Ihrig has reviewed the information and noise impact analysis in the for a Draft Supplemental Environmental Impact Report (DSEIR), State Clearinghouse number 2000011025. The project consists of changing the number of units and total square footage of the Entrada South Planning Area and the DEIR Valencia Commerce Center Planning Area. The modified project consists of a planning area with 1,574 housing units and 730,000 Square feet of commercial and industrial use.

Wilson Ihrig, Acoustical Consultants, has practiced exclusively in the field of acoustics since 1966. During our 58 years of operation, we have prepared hundreds of noise studies for Environmental Impact Reports and Statements. We have one of the largest technical laboratories in the acoustical consulting industry. We also utilize industry-standard acoustical programs such as Roadway Construction Noise Model (RCNM), SoundPLAN, and CADNA. In short, we are well qualified to prepare environmental noise studies and review studies prepared by others.

Adverse Effects of Noise¹

Although the health effects of noise are not taken as seriously in the United States as they are in other countries, they are real and, in many parts of the country, pervasive.

Noise-Induced Hearing Loss. If a person is repeatedly exposed to loud noises, he or she may experience noise-induced hearing impairment or loss. In the United States, both the Occupational Health and Safety Administration (OSHA) and the National Institute for Occupational Safety and Health (NIOSH) promote standards and regulations to protect the hearing of people exposed to high levels of industrial noise.

¹ More information on these and other adverse effects of noise may be found in *Guidelines for Community Noise*, eds B Berglund, T Lindvall, and D Schwela, World Health Organization, Geneva, Switzerland, 1999. (<https://www.who.int/publications/i/item/a68672>)

Speech Interference. Another common problem associated with noise is speech interference. In addition to the obvious issues that may arise from misunderstandings, speech interference also leads to problems with concentration fatigue, irritation, decreased working capacity, and automatic stress reactions. For complete speech intelligibility, the sound level of the speech should be 15 to 18 dBA higher than the background noise. Typical indoor speech levels are 45 to 50 dBA at 1 meter, so any noise above 30 dBA begins to interfere with speech intelligibility. The common reaction to higher background noise levels is to raise one's voice. If this is required persistently for long periods of time, stress reactions and irritation will likely result.

Sleep Disturbance. Noise can disturb sleep by making it more difficult to fall asleep, by waking someone after they are asleep, or by altering their sleep stage, e.g., reducing the amount of rapid eye movement (REM) sleep. Noise exposure for people who are sleeping has also been linked to increased blood pressure, increased heart rate, increase in body movements, and other physiological effects. Not surprisingly, people whose sleep is disturbed by noise often experience secondary effects such as increased fatigue, depressed mood, and decreased work performance.

Cardiovascular and Physiological Effects. Human's bodily reactions to noise are rooted in the "fight or flight" response that evolved when many noises signaled imminent danger. These include increased blood pressure, elevated heart rate, and vasoconstriction. Prolonged exposure to acute noises can result in permanent effects such as hypertension and heart disease.

Impaired Cognitive Performance. Studies have established that noise exposure impairs people's abilities to perform complex tasks (tasks that require attention to detail or analytical processes) and it makes reading, paying attention, solving problems, and memorizing more difficult. This is why there are standards for classroom background noise levels and why offices and libraries are designed to provide quiet work environments.

DSEIR Does Not Analyze Every Sensitive Receiver and Omits Potential Noise Impacts

The DSEIR and the 2017 EIR do not analyze impacts to all vibration and noise sensitive receivers. About 250 feet to the west of the Valencia Commerce Center Planning Area on Harrison Parkway is Grace to You, a Christian ministry. As part of the services provided by Grace to You, there is an onsite radio studio². This is about 250 feet from potential development and 185 feet from potential grading, based on site plans.

Operational and construction noise at 250 feet could be significant. The DSEIR does not provide conclusive data that the studios would not be negatively impacted by the Project's significant operational and construction noise.

The 2017 EIR did not analyze noise impacts to the radio studio. Impacts from operational and construction noise may be more severe than analyzed in the 2017 EIR.

Operational vibration is not expected to produce levels high enough to cause an exceedance of County thresholds. However, construction vibration and more specifically groundborne noise caused by vibration-generating activities- has the potential to exceed thresholds needed for quiet recording

² <https://www.gty.org/about#office> This website states the Current Harrison Parkway facility was selected because the "building needed enough studio space to handle the growing number of radio programs we produce"

spaces. Groundborne noise is the sound heard when vibrations from sources like trains, construction, or heavy machinery travel through the ground and into buildings. These vibrations can cause walls, floors, or furniture to shake slightly, which then produces a low rumbling or humming noise. It's different from regular airborne noise because it comes through the structure itself rather than through the air.

There are no city or county criteria that govern groundborne noise. However, in order to verify that no impacts exist, a criteria from another source should be found with the purpose of comparing modeled levels to a significance threshold. One potential threshold is taken from the Federal Transit Administration's (FTA) Transit Noise and Vibration Impact Assessment Manual³. Table 6-4 of this document lists the groundborne noise criterion for recording studios at 25 dBA. Groundborne vibration can be modeled using the source vibration levels in FTA Table 7-4, the distance propagation formula 7-3, and converted to groundborne noise using the procedure detailed in Table 6-14 and adjustment factors provided in Table 6-13. A summary of this groundborne noise model is presented below:

- Source level of a vibratory roller is 94 dBA at 25 feet
- This propagates to a level of 68 dBA at 185 feet, the closest the grading activities could come to the Grace to You studios.
- FTA table 6-14 describes how to convert groundborne vibration to groundborne noise. This is frequency dependent since higher peak frequencies attenuate more when converting groundborne vibration to groundborne noise because they lose energy more quickly as they travel through the ground and into structures. Based on data Wilson Ihrig has collected from previous projects, Vibratory Rollers have a peak between 30 and 40 Hz. Using the values provided in the table, a 35 dB reduction is estimated between groundborne noise and groundborne vibration. Thus, the modeled noise is 33 dBA.
- FTA Table 6-13 details floor to floor attenuation and amplification due to resonances within the room. If we assume the recording studio is one story above the foundation (lowest) level, this gives 4 dB of total amplification, resulting in a final modeled level of 37 dBA.

37 dBA is 12 dB over the recommended threshold presented in the FTA manual. Using the same methodology, loaded trucks and large bulldozers are also over the threshold at the closest grading activities. Vibratory Rollers are also over the threshold at the closest building construction of 250 feet. 'Typical' vibratory pile driving could create a significant impact at 310 feet away, assuming the vibration peak is below 30 Hz. These all qualify as unreported impacts. There are other ways to predict this vibration; for example the FTA manual describes with equation 6-8 how to analyze impacts using a third octave analysis. A revised DSEIR should either prove that groundborne vibration will not effect recording operations at the Grace to You studios, or mitigation should be included, such as coordination between Grace to You recording schedules and high-vibration construction activities within a certain buffer zone.

³ https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf

Potentially Significant Construction Noise Impacts

On page 5.8-36, the DSEIR states that in Table 5.8-6, construction noise levels would reach a “high of 78.18 dBA (Leq 1-hour) at Receptor 3 (Mission Village, currently under construction)” and continues to acknowledge that “stationary construction equipment significance threshold ... would be exceeded at Receptors 1, 2, and 3 by a maximum of 10.69 dBA (Leq 1-hour).” The DSEIR then lists mitigation measures from the previous EIR to reduce noise levels. However, each of the mitigation measures are not guaranteed to reduce noise levels below impact thresholds, as detailed below:

- ES/VCC-MM-NOI-1: This measure, which requires the use of mufflers in all construction equipment, would not reduce noise because most equipment is already muffled. The bulk of the sound data in RCNM (which is where source levels come from via citation 17 on page 35 of Appendix 5.8) was obtained during the 1990s and 2000s during the Central Artery Tunnel project in Boston (“The Big Dig”). By the 1990s, virtually all construction equipment was fit with mufflers, so the referenced sound levels already account for the noise reduction these mufflers provide.
- The DSEIR states on page 5.8-53 that the “anticipated noise reduction benefits of ES/VCC-MM-NOI-2 and ES/VCC-MM-NOI-4 are not taken into account for purposes of this analysis.” While mitigation measure 2, a logical arrangement of construction staging and reduction of idling, and mitigation measure 4, a clear channel of communication between the contractor and community, are good noise-reducing measures, neither would reduce worst-case scenarios of necessary construction closest to sensitive receivers.
- ES/VCC-MM-NOI-3: This measure details a noise barrier to be constructed to the north of the project site. However, how much reduction it is expected to provide is not discussed, and this noise barrier would only reduce noise directly to the north of the Valencia Commerce Center project but would not adequately mitigate impacts to sensitive receptors along the south and west sides. The nearest existing noise sensitive receptors are residential uses within the Westridge community located directly to the south of the Project site. The noise barrier to the north of the project site would not effectively mitigate significant construction noise impacts to sensitive receptors to the south of the project site.

The DSEIR concludes that “because the Modified Project’s construction activities would be substantially similar to the 2017 Project’s construction activities, the Modified Project is not expected to result in new significant noise impacts compared to the 2017 Project” and that “the Modified Project would not result in any new or substantially more severe significant impacts related to noise compared to those identified for the State-certified EIR for the 2017 Project” (DSEIR, page 5.8-53)

However, the mitigation measures do not effectively mitigate impacts to all affected receivers, nor apply to worst-case conditions, and are based on erroneous reduction assumptions on unmuffled source levels. As such, we believe that construction noise impacts are not mitigated, and an updated DSEIR should be produced that includes calculations that detail how exactly new mitigation (such as an expanded temporary sound wall) will reduce noise levels below impact thresholds.

Operational Noise Impact Analysis Incomplete

Operational noise from the project may represent long-term changes in the surrounding noise environment for nearby receptors. Typically, operational noise sources can include rooftop mechanical units and noise from outdoor spaces such as loading docks and parking lots.

For mechanical units, the DSEIR states on page 5.8-43 that mechanical equipment associated with commercial development would “be designed so as not to exceed 45 dBA at the nearest off-site residential property or 55 dBA at the nearest commercial property per the County Noise Ordinance.” The DSEIR then concludes that “Based on compliance with these requirements, impacts from air conditioning and mechanical equipment affecting off-site sensitive receptors ... would be less than significant.”

The analysis includes no discussion of how realistic this basis of design is. The result is circular – the source levels would always be low enough using this method to ensure there is not an impact, no matter how unrealistic the source levels may be. Noise levels associated with mechanical equipment typical for a project of this type and size can be adjusted for distance attenuation and project geometry to determine if there is an impact that would require mitigation. To confirm a less than significant impact, the Project Applicant should demonstrate that the level generated by these sources is below appropriate significance thresholds. A revised DSEIR must be prepared to document the long-term noise caused by the project and evaluate potential noise impacts to sensitive receivers

Document Contains a Circular Reference

In appendix 5.8, the rightmost column in Table 12 is titled ‘Further Analysis Required (see Tables 12 and 13)?’ This creates a circular reference, rendering the instruction unclear and logically inconsistent. This should be explained more clearly as it appears that the analysis continues in Table 13, but only if there is a positive change in ADT volumes in Table 12.

Conclusion

The Project may result in several noise and vibration exceedances. The DSEIR fails to show effective mitigation for potentially significant noise construction impacts. The DSEIR neglects to study the effect of construction on the Grace to You recording studios. Finally, the DSEIR lacks any quantitative analysis of operational mechanical noise.

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

Very truly yours,
WILSON IHRIG

Jack Meighan
Associate



JACK MEIGHAN

Associate

Jack joined Wilson Ihrig in 2021 and is an experienced acoustics engineer with expertise in projects involving rail transit systems, highways, CEQA analysis, environmental noise reduction, mechanical drawing reviews, and construction noise and vibration mitigation. He has hands-on experience with project management, including client coordination and presentations, as well as in designing, developing, and testing MATLAB code used in acoustics applications. Additionally, his expertise includes taking field measurements, developing test plans and specifying, purchasing, setting up and repairing acoustic measurement equipment. He has experience in using Traffic Noise Model (TNM), CadnaA, EASE, Visual Basic, LabView, and CAD software.

Education

- B.S. in Mechanical Engineering, University of Southern California, Los Angeles, CA
-

Project Experience

Metro Regional Connector, Los Angeles CA

Planned, took, and processed measurements as part of a team to determine the effectiveness of floating slab trackwork for a new subway in downtown Los Angeles that travels below the Walt Disney Concert Hall and the Colburn School of Music.

Rodeo Credit Enterprise CEQA Analysis for New Construction, Palmdale, CA

Wrote an accepted proposal and executed it for a noise study project to determine noise mitigation requirements on a new housing development. Led all aspects of the project and managed the budget during all phases of project completion. Completed 5 separate projects of this type for this developer.

Blackhall Studios, Santa Clarita, CA

Led the vibration measurement effort for a new soundstage directly adjacent to an existing freight and commuter rail line. Tested equipment, processed data, and analyzed results to determine the vibration propagation through the soil to the proposed soundstage locations, and was part of the team that developed mitigation techniques for the office spaces directly next to the rail line.

Octavia Residential Condos CEQA Study, San Francisco, CA

Calculated the STC ratings for the proposed windows to meet Title 24 requirements, modeled the acoustic performance of floor and ceiling structures, researched noise codes, helped with a mechanical design review, and wrote a report summarizing the results for a new Condominium project being developed in San Francisco.

San Diego International Airport Terminal I Replacement, CA

Conducted interior noise and vibration measurements, analyzed measurement data to help determine project criteria, modeled the existing and future terminals in CadnaA, and was part of a team that did a complete HVAC analysis of the entire terminal, as part of a CEQA analysis where a new terminal for the airport is being designed.

Five Points Apartments Noise Study, Whittier, CA

Took measurements, researched sound data and solutions, and recommended mitigation for a new apartment complex that was located next to an existing car wash, as part of a CEQA review.

USC Ellison Vibration Survey, Los Angeles, CA

Conducted vibration measurements as part of a survey to determine the effectiveness of vibration isolation platforms that are used to insulate cell growth in a cancer research facility. Determined the effectiveness and presented this information to the client. Researched and recommended a permanent monitoring system so the client could view data in real time.

TEN50 Condos 'Popping' Noise Investigation, Los Angeles, CA

Was part of a team that investigated the noise source of an unwanted popping noise in luxury condos in Downtown Los Angeles. Helped isolate the noise source location with accelerometers to determine where vibrations were occurring first and used an acoustic camera to determine where in the condo the noise was coming from.

2000 University Project, Berkely, CA

Wrote a construction noise monitoring plan based on environmental noise calculations, wrote a report summarizing the results, and attending a meeting with the client to discuss options.

Bay Area Rapid Transit (BART) On-Track, CA, San Francisco Bay Area, CA*

Day to day project manager, responsible for meetings, presentations, and coordination with the client for an ongoing noise study on the BART system. Developed MATLAB code to process measurements and determine areas where high corrugation was present, contributing to excessively high in-car noise levels. Performed noise measurements inside both the right of way and the vehicle cabin, in addition to rail corrugation measurements.

California I-605/SR-60 Interchange Improvement, Los Angeles, CA*

Developed a noise model of the area that predicted sound levels for abatement design, in addition to conducting noise measurements and analysis. Led the Team in use of the FHWA Traffic Noise Model Software for the project, involving three major highways and two busy interchanges extending over 17 miles in southern California.

Sound Transit On-Track, Seattle, WA*

Took measurements, fixed equipment, and developed software in MATLAB to process Corrugation Analysis Trolley measurements as part of an ongoing noise study on the Sound Transit Link system. Tested vibration data to determine the best measurement and processing techniques to store the data in an online database for in-car measurements.

LA Metro CRRC Railcar Testing, Los Angeles, CA*

Led the effort to plan the measurements, determine measurement locations and finalize the test plan. Formulated a method to capture speed data directly from legacy train vehicles. Executed noise and vibration specification measurements for new rail cars delivered by CRRC.

City of Los Angeles, Pershing Square Station Rehabilitation Noise Monitoring, CA*

Built noise models, wrote a construction noise plan, and assisted in on-site construction noise issues as they arose for a renovation of the Pershing Square metro station in downtown Los

** Work done prior to working for Wilson Ihrig*

Angeles. Trained construction personnel in techniques for noise reduction and how to conduct noise monitoring measurements to meet project specifications.

City of Orange Metrolink Parking Garage Construction Monitoring, CA*

Wrote an adaptive management vibration monitoring plan, set up equipment to monitor live vibration levels, and generated weekly reports as part of an effort to build a new parking garage. Designed, planned, and completed measurements to predict and mitigate pile driving construction impacts at three historic building locations adjacent to the construction site. Coordinated with the client whenever an on-site problem arose.

LA Metro Westside Subway Construction, Los Angeles, CA*

Planned, organized, and processed noise measurements for the Purple Line extension construction. Implemented both long term microphones to measure noise levels and accelerometers to measure vibration levels in existing subway tunnels. Oversaw noise monitoring at sensitive construction sites for the project and worked with the contractor to find ways to reduce construction noise levels by approximately 10dB.

Montreal Réseau Express Métropolitain, Canada*

Conducted vibration propagation measurements used to create models to predict operational vibration levels for an under-construction transit line. Managed equipment, solved problems in the field, and wrote parts of the report summarizing the findings of the acoustic study.

NHCRP Barrier*

Took on-highway measurements and wrote, designed, developed, and tested MATLAB code to identify specific spectrograms to use for analyses for a project evaluating barrier reflected highway traffic noise differences in the presence of a single absorptive or reflective noise barrier.

Siemens Railcar Testing for Sound Transit, Seattle, WA*

Measured in-car noise and vibration for new rail cars delivered by Siemens. Developed new internal techniques for measurements based on the written specifications. Contributed to the team that helped identify issues that new cars had in meeting the Sound Transit specifications for noise and vibration. Participated in developing the test plan and specified then acquired new equipment for the measurement.

Toronto/Ontario Eglinton Crosstown Light Rail, Final Design, Canada*

Assisted in vibration propagation measurements, analysis, and recommendations for mitigation for a 12-mile light-rail line both on and under Eglinton Avenue. Set up and ran equipment for at-grade measurements with an impact hammer for underground measurements with an impact load cell that was used during pre-construction borehole drilling.

** Work done prior to working for Wilson Ihrig*

P: (626) 314-3821
F: (626) 389-5414
E: info@mitschtsailaw.com



139 South Hudson Avenue
Suite 200
Pasadena, California 91101

VIA E-MAIL

February 18, 2025

Jodie Sackett
Senior Planner, Subdivisions
Department of Regional Planning
County of Los Angeles
320 W. Temple St., Floor 13
Los Angeles, CA 90012
(213) 974-6433
Em: subdivisions@planning.lacounty.gov

**RE: County of Los Angeles' Entrada South and Valencia Commerce
Center Project – Supplemental Environmental Impact Report
(SCH# 2000011025)**

Dear Jodie Sackett,

On behalf of the Western States Regional Council of Carpenters (“**Western States Carpenters**” or “**WSRCC**”), our firm is submitting these comments in connection with the County of Los Angeles’ (“**County**”) Supplemental Environmental Impact Report (“**SEIR**”) for the Entrada South and Valencia Commerce Center Project (“**Project**”).

According to the SEIR, the Project as currently proposed involves changes and adjustments to the development of the Entrada South and Valencia Commerce Center Planning Areas that were subject to the State-certified EIR for the Newhall Ranch Resource Management and Development Plan and Spineflower Conservation Plan (“RMDP/SCP”), which was certified in June 2017 by CDFW. (SEIR, p. 1.0-1.) The Project Site is located within the planning boundary of the RMDP/SCP, and the current SEIR for the Project purports to focus upon incremental changes at the Project Site since the 2017 approval of the RMDP/SCP project, changes in circumstances, and any new information that has become available since the prior EIR. (SEIR, pp. 2.0-2 – 3.) The Project, as modified, proposes development of 1,574 residential units and 730,000 square feet of commercial and/or office uses in the Entrada South Planning Area (amounting to a reduction of 151 residential units and an increase of 280,000 square

feet of non-residential floor area relative to the project set forth in the State-certified 2017 EIR). (SEIR, pp. 2.0-4 2.0-16.) The Entrada South Planning Area of the Project would also maintain a 27.2-acre Spineflower Preserve, a 5.4-acre public neighborhood park, a potential school site, recreational centers totaling approximately 8,430 square feet, and approximately 140.4 acres of open space. (SEIR, p. 2.0-4.) The plans for the Valencia Commerce Center would remain largely unchanged from the prior EIR, but would add measures to increase environmental protections and reduce impacts to the neighboring Hasley Creek and Castaic Creek. (SEIR, p. 2.0-18)

The Western States Carpenters is a labor union representing over 90,000 union carpenters in 12 states, including California, and has a strong interest in well-ordered land use planning and in addressing the environmental impacts of development projects. Individual members of the Western States Carpenters live, work, and recreate in the County and surrounding communities and would be directly affected by the Project's environmental impacts.

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

WSRCC incorporates by reference all comments related to the Project or its CEQA review, including the SEIR and the prior Environmental Impact Report for the RMDP/SCP. See *Citizens for Clean Energy v City of Woodland* (2014) 225 Cal.App.4th 173, 191 (finding that any party who has objected to the project's environmental documentation may assert any issue timely raised by other parties).

Moreover, WSRCC requests that the County provide notice for any and all notices referring or related to the Project issued under the California Environmental Quality Act (**CEQA**) (Pub. Res. Code, § 21000 *et seq.*), and the California Planning and Zoning Law ("**Planning and Zoning Law**") (Gov. Code, §§ 65000–65010). California Public Resources Code Sections 21092.2, and 21167(f) and California 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.

I. THE COUNTY SHOULD REQUIRE THE USE OF A LOCAL WORKFORCE TO BENEFIT THE COMMUNITY'S ECONOMIC DEVELOPMENT AND ENVIRONMENT

The County should require the Project to be built by contractors who participate in a Joint Labor-Management Apprenticeship Program approved by the State of California and make a commitment to hiring a local workforce.

Community benefits such as local hire 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 provide 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.

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

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

[L]abor 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

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>.

Furthermore, workforce policies have significant environmental benefits given that they improve an area's jobs-housing balance, decreasing the amount and length of job commutes and the associated greenhouse gas (GHG) emissions. In fact, on May 7, 2021, the South Coast Air Quality Management District found that the "[u]se of a local state-certified apprenticeship program" can result in air pollutant reductions.²

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.³

Moreover, local hire mandates and skill-training are critical facets of a strategy to reduce vehicle miles traveled (VMT). As planning experts Robert Cervero and Michael Duncan have noted, simply placing jobs near housing stock is insufficient to achieve VMT reductions given that the skill requirements of available local jobs must match those held by local residents.⁴ Some municipalities have even tied local hire and other workforce policies to local development permits to address transportation issues. Cervero and Duncan note that:

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

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

⁴ 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>.

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

Recently, the State of California verified its commitment towards workforce development through the Affordable Housing and High Road Jobs Act of 2022, otherwise known as Assembly Bill No. 2011 (“**AB2011**”). AB2011 amended the Planning and Zoning Law to allow ministerial, by-right approval for projects being built alongside commercial corridors that meet affordability and labor requirements.

The County should consider utilizing local workforce policies and requirements to benefit the local area economically and to mitigate greenhouse gas, improve air quality, and reduce transportation impacts.

II. THE COUNTY SHOULD IMPOSE TRAINING REQUIREMENTS FOR THE PROJECT’S CONSTRUCTION ACTIVITIES TO PREVENT COMMUNITY SPREAD OF COVID-19 AND OTHER INFECTIOUS DISEASES

Construction work has been defined as a Lower to High-risk activity for COVID-19 spread by the Occupational Safety and Health Administration. Recently, several construction sites have been identified as sources of community spread of COVID-19.⁵

The Western States Carpenters recommend that the County adopt additional requirements to mitigate public health risks from the Project’s construction activities. The Western States Carpenters requests that the County 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 the Western States Carpenters’ experience with safe construction site work practices, the Western States Carpenters recommends that the County require that while construction activities are being conducted at the Project Site:

⁵ 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>.

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.
- 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.
- 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.⁶

⁶ See also The Center for Construction Research and Training, North America's Building Trades Unions (April 27 2020) NABTU and CPWR COVIC-19 Standards for U.S. Construction Sites, available at https://www.cpwr.com/sites/default/files/NABTU_CPWR_Standards_COVID-19.pdf; Los Angeles County Department of Public Works

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 County should require that all construction workers undergo COVID-19 Training and Certification before being allowed to conduct construction activities at the Project Site.

The Western States Carpenters has also developed a rigorous Infection Control Risk Assessment (“**ICRA**”) training program to ensure it delivers a workforce that understands how to identify and control infection risks by implementing protocols to protect themselves and all others during renovation and construction projects in healthcare environments.⁷

ICRA protocols are intended to contain pathogens, control airflow, and protect patients during the construction, maintenance and renovation of healthcare facilities. ICRA protocols prevent cross contamination, minimizing the risk of secondary infections in patients at hospital facilities.

The County should require the Project to be built using a workforce trained in ICRA protocols.

III. THE CALIFORNIA ENVIRONMENTAL QUALITY ACT

CEQA is a California statute designed to inform decision-makers and the public about the potential significant environmental effects of a project. 14 California Code of Regulations (“**CEQA Guidelines**”), § 15002, subd. (a)(1).⁸ At its core, 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[.]’” *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 564 (internal citation omitted).

(2020) Guidelines for Construction Sites During COVID-19 Pandemic, *available at* https://dpw.lacounty.gov/building-and-safety/docs/pw_guidelines-construction-sites.pdf.

⁷ For details concerning the Western States Carpenters’ ICRA training program, *see* <https://icrahealthcare.com/>.

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. 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. Dept. of Fish & Wildlife* (2015) 62 Cal.4th 204, 217.

To achieve this purpose, CEQA mandates preparation of an Environmental Impact Report (“**EIR**”) for projects so that the foreseeable impacts of pursuing the project can be understood and weighed. *Communities for a Better Environment v. Richmond* (2010) 184 Cal. App. 4th 70, 80. The EIR requirement “is the heart of CEQA.” CEQA Guidelines, § 15003(a).

CEQA directs public agencies to avoid or reduce environmental damage, when possible, by requiring alternatives or mitigation measures. CEQA Guidelines, § 15002, subds. (a)(2)-(3); see also *Berkeley Keep Jets Over the Bay Committee v. Board of Port Commissioners of the City of Oakland* (2001) 91 Cal.App.4th 1344, 1354; *Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 400. The Environmental Impact Report (EIR) serves to 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, subd. (a)(2).

A public agency must prepare an EIR whenever substantial evidence supports a “fair argument” that a proposed project “may have a significant effect on the environment.” Pub. Res. Code, §§ 21100, 21151; CEQA Guidelines, §§ 15002, subds. (f)(1)-(2), 15063; *No Oil, supra*, 13 Cal.App.3d at p. 75; *Communities for a Better Environment v. California Resources Agency* (2002) 103 Cal.App.4th 98, 111-112. 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 Public Resources Code section 21081. See CEQA Guidelines, §§ 15092, subds. (b)(2)(A)-(B).

Essentially, should a lead agency be presented with a fair argument that a project may have a significant effect on the environment, the lead agency shall prepare an EIR even though it may also be presented with other substantial evidence that the project will not have a significant effect. CEQA Guidelines, §§ 15064(f)(1)-(2); see *No Oil, supra*, 13 Cal.App.3d at p. 75 (internal citations and quotations omitted). Substantial evidence includes “enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached.” CEQA Guidelines, § 15384, subd. (a).

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.

The preparation and circulation of an EIR is more than a set of technical hurdles for agencies and developers to overcome. *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). 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. *Id.* 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. *Id.*

A strong presumption in favor of requiring preparation of an EIR is built into CEQA. This presumption is reflected in what is known as the “fair argument” standard under which an EIR must be prepared whenever substantial evidence in the record supports a fair argument that a project may have a significant effect on the environment. *Quail Botanical Gardens Found., Inc. v. City of Encinitas* (1994) 29 Cal.App.4th 1597, 1602; *Friends of “B” St. v. City of Hayward* (1980) 106 Cal.3d 988, 1002.

Further, it is the duty of the lead agency, not the public, to conduct the proper environmental studies. “The agency should not be allowed to hide behind its own failure to gather relevant data.” *Sundstrom, supra*, 202 Cal.App.3d at p. 311. “Deficiencies in the record may actually enlarge the scope of fair argument by lending a logical plausibility to a wider range of inferences.” *Ibid*; see also *Gentry v. City of Murrieta* (1995) 36 Cal.App.4th 1359, 1382 (lack of study enlarges the scope of the fair argument which may be made based on the limited facts in the record).

Thus, refusal to complete recommended studies lowers the already low threshold to establish a fair argument. The court may not exercise its independent judgment on the omitted material by determining whether the ultimate decision of the lead agency would have been affected had the law been followed. *Environmental Protection Information Center v. Cal. Dept. of Forestry* (2008) 44 Cal.4th 459, 486 (internal citations and quotations omitted). The remedy for this deficiency would be for the trial court to issue a writ of mandate. *Ibid.*

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. *Berkeley Keep Jets, supra*, 91 Cal.App.4th at p. 1355 (quoting *Laurel Heights, supra*, 47 Cal.3d at pp. 391, 409 fn. 12) (internal quotations omitted). A clearly inadequate or unsupported study is entitled to no judicial deference. *Ibid*. 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. County 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 First District Court of Appeal has previously stated, 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. *Berkeley Keep Jets, supra*, 91 Cal.App.4th at p. 1355 (internal quotations omitted).

Both the review for failure to follow CEQA’s procedures and the fair argument test are questions of law, thus, the de novo standard of review applies. *Vineyard Area Citizens for Responsible Growth v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 435. Whether the agency’s record contains substantial evidence that would support a fair argument that the project may have a significant effect on the environment is treated as a question of law. *Consolidated Irrigation Dist., supra*, 204 Cal.App.4th at p. 207; Kostka and Zischke, *Practice Under the Environmental Quality Act* (2017, 2d ed.) at § 6.76.

Section 15088.5(a) of the CEQA Guidelines provides that an EIR must be recirculated whenever there is disclosure of significant new information. Significant new information includes: (1) disclosure of a new significant environmental impact resulting from the project or from a new proposed mitigation measure; (2) disclosure of a substantial increase in the severity of an environmental impact unless mitigation measures are adopted that reduce the impact to a level of insignificance; and (3) disclosure of a feasible project alternative or mitigation measure considerably different from others previously analyzed which would clearly lessen the significant environmental impacts of the project which the project proponents decline to adopt. *Id*.

Additionally, an EIR must be recirculated when it is so fundamentally inadequate and conclusory in nature that meaningful public review and comment is precluded. *Id*. [citing *Mountain Lion Coalition v. Fish & Game Com.* (1989) 214 Cal.App.3d 1043].

Here, as discussed below, the SEIR fails to substantiate all of its conclusions to allow meaningful public review and comment, provide adequate mitigation measures, and fully assess all pertinent environmental factors. Accordingly, this comment letter discloses significant new information, necessitating revision and recirculation of the SEIR.

IV. THE SEIR IS INADEQUATE UNDER CEQA AND SHOULD BE REVISED AND RECIRCULATED

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

CEQA requires that an EIR identify and discuss the significant effects of a Project, how those significant effects can be mitigated or avoided. CEQA Guidelines § 15126.2; PRC §§ 21100(b)(1), 21002.1(a). If a project has a significant effect on the environment, an 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.” CEQA Guidelines § 15092(b)(2) (A–B). Such findings must be supported by substantial evidence. CEQA Guidelines § 15091(b).

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 EIR 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 (the 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).

Here, for the reasons discussed in detail below, the SEIR fails to comply with the foregoing requirements.

1. The SEIR Fails to Adequately Analyze and Mitigate Air Quality Impacts

A fundamental purpose of an EIR is to identify ways in which a proposed project's significant environmental impacts can be mitigated or avoided. Pub. Res. Code §§ 21002.1(a), 21061. To implement this statutory purpose, an EIR must describe any feasible mitigation measures that can minimize the project's significant environmental effects. PRC §§ 21002.1(a), 21100(b)(3); CEQA Guidelines §§ 15121(a), 15126.4(a).

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” PRC §§ 21002; 21002.1, 21081; CEQA Guidelines §§ 15091, 15092(b)(2)(A); and find that ‘specific overriding economic, legal, social, technology or other benefits of the project outweigh the significant effects on the environment.’ PRC §§ 21002; 21002.1, 21081; CEQA Guidelines §§ 15091, 15092(b)(2)(B). “A gloomy forecast of environmental degradation is of little or no value without pragmatic, concrete means to minimize the impacts and restore ecological equilibrium.” *Environmental Council of Sacramento v. City of Sacramento* (2006) 142 Cal.App.4th 1018, 1039.

According to CEQA Guidelines, “[w]hen an EIR has been prepared for a project, the Responsible Agency shall not approve the project as proposed if the agency finds any feasible alternative or feasible mitigation measures within its powers that would substantially lessen or avoid any significant effect the project would have on the

environment.” CEQA Guidelines Section 15096(g)(2). The SEIR reaffirms the prior conclusion from the State-certified EIR that the Project will have significant and unavoidable construction and operational Air Quality impacts. (SEIR, pp. 2.0-27 – 28.)

However, an impact can only be labeled as significant-and-unavoidable after all available, feasible mitigation is considered and the EIR lacks substantial evidence to support a finding that no other feasible mitigation existed to mitigate Project’s significant impacts. Here, the SEIR offers no new mitigation measures to ameliorate the significant anticipated air quality impacts, and relies only on the Project’s anticipated regulatory compliance and seven assorted Project Design Features (“PDFs”) in reaching the conclusion that the Project will result in no substantial increase in the severity of the Air Quality impacts. (SEIR at pp. 5.1-37 – 39.)

Given the current anticipated air quality impacts of the Project are considered substantial and unavoidable, and that the Project appears to be relying upon compliance with current regulations and PDFs for the proposition that its Air Quality impacts are not anticipated to increase beyond those identified in the State-certified EIR, the SEIR should be presenting an analysis of the baseline of the Project’s Air Quality impacts before incorporating of the mitigating effects of regulation and PDFs in its conclusions. In this way, the SEIR’s analysis would better reveal the nature and extent of the mitigating effect of these measures, such that it will allow the County and the general public to better ascertain if additional mitigation measures would have an appreciable effect on the Air Quality impacts. At a minimum, the SEIR should be revised and recirculated to adjust its analysis and consider whether any additional Air Quality mitigation measures would be feasible and effective in reducing the Project’s anticipated significant impacts.

Further, and in addition to its lack of requisite and appropriate analysis, the SEIR currently fails to incorporate any and all feasible mitigation and fails to adopt enforceable mitigation measures. A mitigation measure must be enforceable through conditions of approval, contracts or other means that are legally binding. (PRC § 21081.6; CEQA Guidelines § 15126.4(a)(2).) Mitigation measures should be implemented, not adopted and ignored (*Federation of Hillside & Canyon Ass’ns v. City of Los Angeles* (2000) 83 Cal.App.4th 1252, 1261.)

Given that the Project Site sits in a region that remains in non-attainment for multiple state and national air quality standards, WSRCC agrees with the SEIR that the air

quality impacts of the Project will be significant and unavoidable regardless of the mitigation measures ultimately undertaken. However, the Project and its SEIR still have an obligation to reduce those additional air quality impacts to the greatest extent feasible via appropriately crafted mitigation measures. The County should revise the SEIR to commit to holding the Project to that essential standard.

2. The SEIR Fails to Adequately Analyze and Mitigate Wildfire Impacts

The SEIR's analysis of Wildfire Impacts is deficient, in that it references Project Design Features ("PDFs") as the only new measures aimed at offsetting the Project's wildfires impacts/risks (SEIR, pp. ES-42) and it relies entirely on those PDFs and the Project's purported regulatory compliance. This deficiency in the SEIR is particularly prominent given the significant and unavoidable cumulative wildfire impacts identified for the Project by the prior State-certified EIR. In the wake of the recent catastrophic wildfires in Southern California, including but not limited to the Hurst Fire, the Castaic Fire, and the Lidia Fire that were located in and around the Santa Clarita Valley, the SEIR's analysis of wildfire risk and implementation of mitigation measures to mitigate that risk falls well short. At a minimum, the SEIR must conduct a genuine and thorough analysis of the wildfire risks attendant to the Project Site without the prior incorporation and inclusion of the PDFs in that analysis. Indeed, the areas surrounding the Project Site are well known to be at extremely high risk for wildfires. As such, the SEIR's analysis of Wildfire Impacts is entirely deficient as it does not adequately present and assess the very real dangers of wildfires on the local landscape and then set forth appropriate mitigation measures to ameliorate those risks to the greatest extent possible.

B. The SEIR Improperly Mischaracterizes Mitigation Measures as "Project Design Features"

In this instance, the SEIR improperly recasts a wide array of mitigation measures as "Project Design Features" or "PDFs." Relying on the extensive list of PDFs for the Project, the SEIR then concludes in many instances that the Project's impacts are less than significant, and that no further mitigation is required.

However, it is established that "[a]voidance, minimization and / or mitigation measure' . . . are not 'part of the project.' . . . compressing the analysis of impacts and

mitigation measures into a single issue . . . disregards the requirements of CEQA.” (*Lotus v. Department of Transportation* (2014) 223 Cal. App. 4th 645, 656.)

When “an agency decides to incorporate mitigation measures into its significance determination, and relies on those mitigation measures to determine that no significant effects will occur, that agency must treat those measures as though there were adopted following a finding of significance.” (*Lotus, supra*, 223 Cal. App. 4th at 652 [citing CEQA Guidelines § 15091(a)(1) and Cal. Public Resources Code § 21081(a)(1).])

By mischaracterizing mitigation measures as PDFs, the County violates CEQA by failing to disclose “the analytic route that the agency took from the evidence to its findings.” (Cal. Public Resources Code § 21081.5; CEQA Guidelines § 15093; *Village Laguna of Laguna Beach, Inc. v. Board of Supervisors* (1982) 134 Cal. App. 3d 1022, 1035 [quoting *Topanga Assn for a Scenic Community v. County of Los Angeles* (1974) 11 Cal. 3d 506, 515].)

Specifically, the SEIR delineates the following twenty-two (22) distinct PDFs to be applied to the project, all of which are tantamount to mitigation measures under CEQA:

Regarding Air Quality Impacts:

ES/VCC-PDF-AQ-1 through ES/VCC-PDF-AQ-7.

(SEIR at pp. 5.1-38 – 39.)

Regarding Biological Resources Impacts:

ES-PDF-BIO-1;

VCC-PDF-BIO-1;

VCC-PDF-BIO-2;

RMDP/SCP-AEA-PDF-3-1;

RMDP/SCP-AEA-PDF-3-8;

RMDP/SCP-AEA-PDF-3-11; and

RMDP/SCP-AEA-PDF-3-12.

(SEIR at pp. 5.2-63 – 65.)

Regarding Transportation Impacts:

ES/VCC-PDF-TR-1.

(SEIR at pp. 5.9-25 – 26.)

Regarding Wildfire Impacts:

PDF-WF-1 through PDF-WF-7.

(SEIR at pp. 5.15-49 – 53.)

Notably, the October 7, 2021 Initial Study (“IS”) for the Project determined that the Project presented potentially significant environmental impacts for a variety of environmental factors, including but not limited to the following: Air Quality, Biological Resources, Cultural Resources, Hazards/Hazardous Materials, Hydrology/Water Quality, Land Use/Planning, Noise, Public Services, Transportation, Tribal Cultural Resources, Utilities/Services, Wildfire, and Mandatory Findings of Significance. (Appendix 1a to SEIR, IS at pp. 25, 42, 44-45, 49, 72, 74, 76-80, 82, 86, 91, 98, 100, 102-103, and 104-106.) Fast-forwarding to the publication of the Project’s SEIR, the SEIR then determines that the Project would have either no new significant impact or no substantial increase in severity of impact for Air Quality, Biological Resources, Transportation, and Wildfire. According to the SEIR, the once-potentially significant impacts for each of these environmental factors have purportedly been cured, either in whole or in part, via the incorporation of the Project’s so-called PDFs.

By way of example, deploying Tier 4 construction equipment to reduce impacts to air quality (per ES/VCC-PDF-AQ-2) is not a bona fide feature of “project design.” (SEIR, p. 5.1-38.) The offering of a conservation easement over preserved streambeds and riparian areas within Unnamed Canyon 2, Castaic Creek, and Hasley Canyon to reduce the Project’s biological resources impacts (per ES-PDF-BIO-1 and VCC-PDF-BIO-1) is not a bona fide feature of “project design.” The applicant’s future preparation and submission of a Construction Traffic Management Plan for the Project (per ES/VCC-PDF-TR-1) is not a bona fide feature of “project design.” (SEIR, p. 5.9-25.) And, to be sure, the applicant’s future preparation of a Construction Fire Prevention Plan for the Project (per PDF-WF-1) and the required annual completion of vegetation management within the Project’s Fuel Modification Zones and common areas (per PDF-WF-3) is not a bona fide feature of “project design.” The foregoing are but a handful of examples of the myriad instances of the SEIR’s mislabeling of the Project’s mitigation measures as PDFs. Indeed, mere cursory

review of the SEIR reveals that the bulk of the items on the foregoing non-exclusive list of proposed PDFs for the Project amount to nothing more than an attempt to disguise what are, in fact, mitigation measures for the Project. In turn, the SEIR then premises its analysis regarding the allegedly “no new significant impact” and/or “no substantial increase in severity of impact” in the areas of Air Quality, Biological Resources, Transportation, and Wildfire on the incorporation of the so-called PDFs. To that end, the impacts analysis put forth in the SEIR is demonstrably tainted and flawed by the improper application of the Project PDFs.

By recasting its mitigation measures in this manner, the SEIR has attempted to skirt its responsibilities to fully analyze the various environmental impacts implicated by the PDFs. Such an attempt to evade accountability for addressing the Project’s environmental impacts directly violates CEQA, and the SEIR cannot permissibly be certified unless and until this deficiency is rectified.

C. The SEIR’s Mitigation Measures Are Insufficient

A fundamental purpose of an EIR is to identify ways in which a proposed project’s significant environmental impacts can be mitigated or avoided. Pub. Res. Code §§ 21002.1(a), 21061. To implement this statutory purpose, an EIR must describe any feasible mitigation measures that can minimize the project’s significant environmental effects. PRC §§ 21002.1(a), 21100(b)(3); CEQA Guidelines §§ 15121(a), 15126.4(a).

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” PRC §§ 21002; 21002.1, 21081; CEQA Guidelines §§ 15091, 15092(b)(2)(A); and find that ‘specific overriding economic, legal, social, technology or other benefits of the project outweigh the significant effects on the environment.’ PRC §§ 21002; 21002.1, 21081; CEQA Guidelines §§ 15091, 15092(b)(2)(B). “A gloomy forecast of environmental degradation is of little or no value without pragmatic, concrete means to minimize the impacts and restore ecological equilibrium.” *Environmental Council of Sacramento v. City of Sacramento* (2006) 142 Cal.App.4th 1018, 1039.

CEQA mitigation measures proposed and adopted are required to describe what actions will be taken to reduce or avoid an environmental impact. (CEQA Guidelines § 15126.4(a)(1)(B) [providing “[f]ormulation of mitigation measures should not be deferred until some future time.”].) While the same Guidelines section 15126.5(a)(1)(B)

acknowledges an exception to the rule against deferrals, such exception is narrowly proscribed to situations where it is impractical or infeasible to include those details during the project's environmental review.

According to CEQA Guidelines, “[w]hen an EIR has been prepared for a project, the Responsible Agency shall not approve the project as proposed if the agency finds any feasible alternative or feasible mitigation measures within its powers that would substantially lessen or avoid any significant effect the project would have on the environment.” CEQA Guidelines Section 15096(g)(2).

Here, the SEIR’s mitigation measures for the Project are inadequate as follows:

1. The SEIR’s Biological Resources Mitigation Measures Are Improperly Deferred

CEQA forbids deferred mitigation. Guidelines § 15126.4(a)(1)(B). CEQA allows deferral of details of a mitigation measure only “when it is impractical or infeasible to include those details during the project’s environmental review.” (*Id.*) CEQA further requires: “that the agency (1) commits itself to the mitigation, (2) adopts specific performance standards the mitigation will achieve, and (3) identifies the type(s) of potential action(s) that can feasibly achieve that performance standard...” Guidelines § 15126.4(a)(1)(B). Deferring formulation of a Project’s actual mitigation measures to some undefined time after the Project’s approval is improper and cannot be used as a substitute for proper mitigation under CEQA. Impermissible deferral can occur when an EIR calls for mitigation measures to be created based on future studies or describes mitigation measures in general terms but the agency fails to commit itself to specific performance standards. (*Preserve Wild Santee v. City of Santee* (2012) 210 Cal.App.4th 260, 281 [city improperly deferred mitigation to butterfly habitat by failing to provide standards or guidelines for its management].)

Here, the SEIR’s Biological Resources Mitigation Measure ES/VCC-MM-BIO-1 provides as follows, in relevant part:

Prior to construction, the Applicant shall develop a relocation plan for California glossy snake, to be incorporated into the relocation plan developed for other special-status reptile species, according to requirements in RMDP/SCP BIO-54.

(SEIR at p. 2.0-152, Appendix 5.2, p. D-41.)

The above mitigation measure, on its face, unjustifiably defers the development of a relocation plan for the California glossy snake until after approval of the Project. The postponement of this plan development denies the public and the County's decisionmakers of the opportunity to assess the adequacy of the relocation plan to be prepared, and the Project's overall impact on biological resources with respect to disturbance and relocation of any California glossy snake impacted by the project. Indeed, because of this deferment, the County's decisionmakers have been denied the opportunity fully consider the scope of the Project's impacts to these biological resources and whether such impacts have been adequately mitigated, while the general public has also been denied the opportunity to assess and comment upon the associated impacts and the adequacy of the mitigation plans.

Thus, in the context of ES/VCC-MM-BIO-1, the County has failed to meet CEQA's preconditions and requirements concerning mitigation, as the SEIR has failed to show why the Project's relocation plan for the California glossy snake, and a comprehensive analysis of the anticipated impacts of this mitigation measure on such biological resources, cannot be completed or achieved at this time prior to adoption of the SEIR. The deferment of this mitigation measure also improperly constrains the SEIR's assessment of the impacts that the measure will have individually or cumulatively, and the specific performance criteria the Applicant will have to meet with regard to the measure. Accordingly, the proposed mitigation measure is improperly deferred as it defers the formulation of components of the mitigation to a later time and further does not explain how the measures will clearly reduce the Project's biological resources impacts to a level of insignificance.

V. CONCLUSION

Based on the foregoing concerns, the County should require revision and recirculation of the SEIR for the Project pursuant to CEQA. Absent doing so, the SEIR in its current form directly violates CEQA in multiple respects. If the County should have any questions or concerns, please do not hesitate to contact this office.

Sincerely,



Jeremy Herwitt
Attorneys for Western States 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**);

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

EXHIBIT A



Technical Consultation, Data Analysis and
Litigation Support for the Environment

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.

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:

$\text{Emissions}_{\text{pollutant}}$ = emissions from vehicle running for each pollutant

VMT = vehicle miles traveled

$\text{EF}_{\text{running,pollutant}}$ = 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.

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

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%

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,

A handwritten signature in blue ink, appearing to read "M Hagemann".

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

A handwritten signature in blue ink, appearing to read "Paul Rosenfeld".

Paul E. Rosenfeld, Ph.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

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

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

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

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

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

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.

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

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

tblVehicleTrips	SU_TR	5.95	3.20
tblVehicleTrips	SU_TR	72.16	57.65
tblVehicleTrips	SU_TR	25.24	6.39
tblVehicleTrips	WD_TR	6.59	5.83
tblVehicleTrips	WD_TR	6.65	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

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2.1 Overall Construction**Unmitigated Construction**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
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	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	1,721.6826	1,721.6826	0.1294	0.0000	1,724.9187
2023	0.6148	3.3649	5.6747	0.0178	1.1963	0.0996	1.2959	0.3203	0.0935	0.4138	0.0000	1,627.5295	1,627.5295	0.1185	0.0000	1,630.4925
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	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	1,721.6826	1,721.6826	0.1294	0.0000	1,724.9187

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2.1 Overall Construction**Mitigated Construction**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2021	0.1713	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	1,721.6823	1,721.6823	0.1294	0.0000	1,724.9183
2023	0.6148	3.3648	5.6747	0.0178	1.1963	0.0996	1.2959	0.3203	0.0935	0.4138	0.0000	1,627.5291	1,627.5291	0.1185	0.0000	1,630.4921
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	52.9077	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	1,721.6823	1,721.6823	0.1294	0.0000	1,724.9183

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	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	1.4103	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

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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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
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	0.1398	1.2312	0.7770	7.6200e-003		0.0966	0.0966		0.0966	0.0966	0.0000	3,896.0732	3,896.0732	0.1303	0.0468	3,913.2833
Mobile	1.5857	7.9962	19.1834	0.0821	7.7979	0.0580	7.8559	2.0895	0.0539	2.1434	0.0000	7,620.4986	7,620.4986	0.3407	0.0000	7,629.0162
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	236.9712	12,294.1807	12,531.1519	15.7904	0.1260	12,963.4751

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2.2 Overall Operational**Mitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
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	0.1398	1.2312	0.7770	7.6200e-003		0.0966	0.0966		0.0966	0.0966	0.0000	3,896.0732	3,896.0732	0.1303	0.0468	3,913.2833
Mobile	1.5857	7.9962	19.1834	0.0821	7.7979	0.0580	7.8559	2.0895	0.0539	2.1434	0.0000	7,620.4986	7,620.4986	0.3407	0.0000	7,629.0162
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	236.9712	12,294.1807	12,531.1519	15.7904	0.1260	12,963.4751

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

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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

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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

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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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0496	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

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3.2 Demolition - 2021**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	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	17.4566	17.4566	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	8.5100e-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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0496	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	51.0011	51.0011	0.0144	0.0000	51.3600
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

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3.2 Demolition - 2021**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	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	17.4566	17.4566	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	8.5100e-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**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.1807	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

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

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.1807	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	33.7060
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	33.7060

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

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.1741	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	103.5405	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

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3.4 Grading - 2021**Unmitigated Construction Off-Site**

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.1741	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

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3.4 Grading - 2021**Mitigated Construction Off-Site**

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0807	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		5.2600e-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

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3.4 Grading - 2022**Unmitigated Construction Off-Site**

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0807	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		5.2600e-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

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3.4 Grading - 2022**Mitigated Construction Off-Site**

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

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

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	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	1,408.7952	1,408.7952	0.0530	0.0000	1,410.1208

Mitigated Construction On-Site

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

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	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	1,408.7952	1,408.7952	0.0530	0.0000	1,410.1208

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1942	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

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	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	0.1113	1.4600e-003	0.1127	0.0321	1.4000e-003	0.0335	0.0000	417.9930	417.9930	0.0228	0.0000	418.5624
Worker	0.3753	0.2708	3.1696	0.0101	1.0840	8.4100e-003	1.0924	0.2879	7.7400e-003	0.2957	0.0000	909.3439	909.3439	0.0234	0.0000	909.9291
Total	0.4135	1.5218	3.5707	0.0144	1.1953	9.8700e-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

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

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	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	0.1113	1.4600e-003	0.1127	0.0321	1.4000e-003	0.0335	0.0000	417.9930	417.9930	0.0228	0.0000	418.5624
Worker	0.3753	0.2708	3.1696	0.0101	1.0840	8.4100e-003	1.0924	0.2879	7.7400e-003	0.2957	0.0000	909.3439	909.3439	0.0234	0.0000	909.9291
Total	0.4135	1.5218	3.5707	0.0144	1.1953	9.8700e-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

3.6 Paving - 2023**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	6.7100e-003	0.0663	0.0948	1.5000e-004		3.3200e-003	3.3200e-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	0.0663	0.0948	1.5000e-004		3.3200e-003	3.3200e-003		3.0500e-003	3.0500e-003	0.0000	13.0175	13.0175	4.2100e-003	0.0000	13.1227

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3.6 Paving - 2023**Unmitigated Construction Off-Site**

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	6.7100e-003	0.0663	0.0948	1.5000e-004		3.3200e-003	3.3200e-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	0.0663	0.0948	1.5000e-004		3.3200e-003	3.3200e-003		3.0500e-003	3.0500e-003	0.0000	13.0175	13.0175	4.2100e-003	0.0000	13.1227

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3.6 Paving - 2023**Mitigated Construction Off-Site**

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

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

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3.6 Paving - 2024**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	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	1.4697	1.4697	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	1.4697	1.4697	4.0000e-005	0.0000	1.4706

Mitigated Construction On-Site

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

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3.6 Paving - 2024**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	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	1.4697	1.4697	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	1.4697	1.4697	4.0000e-005	0.0000	1.4706

3.7 Architectural Coating - 2024**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
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	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	0.0000	4.4682	4.4682	2.5000e-004	0.0000	4.4745

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

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	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	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	0.0000	4.4682	4.4682	2.5000e-004	0.0000	4.4745

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

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

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	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	1.5857	7.9962	19.1834	0.0821	7.7979	0.0580	7.8559	2.0895	0.0539	2.1434	0.0000	7,620.4986	7,620.4986	0.3407	0.0000	7,629.0162
Unmitigated	1.5857	7.9962	19.1834	0.0821	7.7979	0.0580	7.8559	2.0895	0.0539	2.1434	0.0000	7,620.4986	7,620.4986	0.3407	0.0000	7,629.0162

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
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

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Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S 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	69.00	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

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

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

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Apartments Low Rise	408494	2.2000e-003	0.0188	8.0100e-003	1.2000e-004		1.5200e-003	1.5200e-003		1.5200e-003	1.5200e-003	0.0000	21.7988	21.7988	4.2000e-004	4.0000e-004	21.9284
Apartments Mid Rise	1.30613e+007	0.0704	0.6018	0.2561	3.8400e-003		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	1.7500e-003	0.0000	24.9983	24.9983	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	0.0000	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	6.4900e-003	0.0000	92.9036	92.9036	1.7800e-003	1.7000e-003	93.4557
Quality Restaurant	1.84608e+006	9.9500e-003	0.0905	0.0760	5.4000e-004		6.8800e-003	6.8800e-003		6.8800e-003	6.8800e-003	0.0000	98.5139	98.5139	1.8900e-003	1.8100e-003	99.0993
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	3.4000e-004	0.0000	4.9009	4.9009	9.0000e-005	9.0000e-005	4.9301
Total		0.1398	1.2312	0.7770	7.6200e-003		0.0966	0.0966		0.0966	0.0966	0.0000	1,383.4268	1,383.4268	0.0265	0.0254	1,391.6478

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

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Apartments Low Rise	408494	2.2000e-003	0.0188	8.0100e-003	1.2000e-004		1.5200e-003	1.5200e-003		1.5200e-003	1.5200e-003	0.0000	21.7988	21.7988	4.2000e-004	4.0000e-004	21.9284
Apartments Mid Rise	1.30613e+007	0.0704	0.6018	0.2561	3.8400e-003		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	1.7500e-003	0.0000	24.9983	24.9983	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	0.0000	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	6.4900e-003	0.0000	92.9036	92.9036	1.7800e-003	1.7000e-003	93.4557
Quality Restaurant	1.84608e+006	9.9500e-003	0.0905	0.0760	5.4000e-004		6.8800e-003	6.8800e-003		6.8800e-003	6.8800e-003	0.0000	98.5139	98.5139	1.8900e-003	1.8100e-003	99.0993
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	3.4000e-004	0.0000	4.9009	4.9009	9.0000e-005	9.0000e-005	4.9301
Total		0.1398	1.2312	0.7770	7.6200e-003		0.0966	0.0966		0.0966	0.0966	0.0000	1,383.4268	1,383.4268	0.0265	0.0254	1,391.6478

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5.3 Energy by Land Use - Electricity**Unmitigated**

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Apartments Low Rise	106010	33.7770	1.3900e-003	2.9000e-004	33.8978
Apartments Mid Rise	3.94697e+006	1,257.5879	0.0519	0.0107	1,262.0869
General Office Building	584550	186.2502	7.6900e-003	1.5900e-003	186.9165
High Turnover (Sit Down Restaurant)	1.58904e+006	506.3022	0.0209	4.3200e-003	508.1135
Hotel	550308	175.3399	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		2,512.6465	0.1037	0.0215	2,521.6356

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5.3 Energy by Land Use - Electricity**Mitigated**

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Apartments Low Rise	106010	33.7770	1.3900e-003	2.9000e-004	33.8978
Apartments Mid Rise	3.94697e+006	1,257.5879	0.0519	0.0107	1,262.0869
General Office Building	584550	186.2502	7.6900e-003	1.5900e-003	186.9165
High Turnover (Sit Down Restaurant)	1.58904e+006	506.3022	0.0209	4.3200e-003	508.1135
Hotel	550308	175.3399	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		2,512.6465	0.1037	0.0215	2,521.6356

6.0 Area Detail**6.1 Mitigation Measures Area**

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

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
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
Hearth	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	205.3295
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

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6.2 Area by SubCategory**Mitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
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
Hearth	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	205.3295
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**

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

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

7.2 Water by Land Use**Unmitigated**

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Apartments Low Rise	1.62885 / 1.02688	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	7.99802 / 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 / 0.154996	11.3934	0.0796	1.9600e-003	13.9663
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

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

7.2 Water by Land Use**Mitigated**

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Apartments Low Rise	1.62885 / 1.02688	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	7.99802 / 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 / 0.154996	11.3934	0.0796	1.9600e-003	13.9663
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**

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

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	207.8079	12.2811	0.0000	514.8354
Unmitigated	207.8079	12.2811	0.0000	514.8354

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

8.2 Waste by Land Use**Unmitigated**

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Apartments Low Rise	11.5	2.3344	0.1380	0.0000	5.7834
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	5.1393	0.0000	215.4430
Hotel	27.38	5.5579	0.3285	0.0000	13.7694
Quality Restaurant	7.3	1.4818	0.0876	0.0000	3.6712
Regional Shopping Center	58.8	11.9359	0.7054	0.0000	29.5706
Total		207.8079	12.2811	0.0000	514.8354

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

8.2 Waste by Land Use**Mitigated**

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Apartments Low Rise	11.5	2.3344	0.1380	0.0000	5.7834
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	5.1393	0.0000	215.4430
Hotel	27.38	5.5579	0.3285	0.0000	13.7694
Quality Restaurant	7.3	1.4818	0.0876	0.0000	3.6712
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

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

Boilers

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

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

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

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/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

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

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

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

tblVehicleTrips	SU_TR	5.95	3.20
tblVehicleTrips	SU_TR	72.16	57.65
tblVehicleTrips	SU_TR	25.24	6.39
tblVehicleTrips	WD_TR	6.59	5.83
tblVehicleTrips	WD_TR	6.65	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

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

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
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	6,234.797 4	1.9495	0.0000	6,283.535 2
2022	5.3304	38.8967	49.5629	0.1517	9.8688	1.6366	10.7727	3.6558	1.5057	5.1615	0.0000	15,251.56 74	15,251.56 74	1.9503	0.0000	15,278.52 88
2023	4.8957	26.3317	46.7567	0.1472	9.8688	0.7794	10.6482	2.6381	0.7322	3.3702	0.0000	14,807.52 69	14,807.52 69	1.0250	0.0000	14,833.15 21
2024	237.1630	9.5575	15.1043	0.0244	1.7884	0.4698	1.8628	0.4743	0.4322	0.5476	0.0000	2,361.398 9	2,361.398 9	0.7177	0.0000	2,379.342 1
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	15,251.56 74	1.9503	0.0000	15,278.52 88

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

2.1 Overall Construction (Maximum Daily Emission)

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	4.2769	46.4588	31.6840	0.0643	18.2675	2.0461	20.3135	9.9840	1.8824	11.8664	0.0000	6,234.7974	6,234.7974	1.9495	0.0000	6,283.5352
2022	5.3304	38.8967	49.5629	0.1517	9.8688	1.6366	10.7727	3.6558	1.5057	5.1615	0.0000	15,251.5674	15,251.5674	1.9503	0.0000	15,278.5288
2023	4.8957	26.3317	46.7567	0.1472	9.8688	0.7794	10.6482	2.6381	0.7322	3.3702	0.0000	14,807.5269	14,807.5269	1.0250	0.0000	14,833.1520
2024	237.1630	9.5575	15.1043	0.0244	1.7884	0.4698	1.8628	0.4743	0.4322	0.5476	0.0000	2,361.3989	2,361.3989	0.7177	0.0000	2,379.3421
Maximum	237.1630	46.4588	49.5629	0.1517	18.2675	2.0461	20.3135	9.9840	1.8824	11.8664	0.0000	15,251.5674	15,251.5674	1.9503	0.0000	15,278.5288

[illegible]

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

2.2 Overall Operational**Unmitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.59 50	18,148.59 50	0.4874	0.3300	18,259.11 92
Energy	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.983 2	8,355.983 2	0.1602	0.1532	8,405.638 7
Mobile	9.8489	45.4304	114.8495	0.4917	45.9592	0.3360	46.2951	12.2950	0.3119	12.6070		50,306.60 34	50,306.60 34	2.1807		50,361.12 08
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 16	76,811.18 16	2.8282	0.4832	77,025.87 86

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.59 50	18,148.59 50	0.4874	0.3300	18,259.11 92
Energy	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.983 2	8,355.983 2	0.1602	0.1532	8,405.638 7
Mobile	9.8489	45.4304	114.8495	0.4917	45.9592	0.3360	46.2951	12.2950	0.3119	12.6070		50,306.60 34	50,306.60 34	2.1807		50,361.12 08
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 16	76,811.18 16	2.8282	0.4832	77,025.87 86

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
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

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

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

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

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
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		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

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

3.2 Demolition - 2021**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
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	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

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

3.2 Demolition - 2021**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
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**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307			0.0000			0.0000
Off-Road	3.8882	40.4971	21.1543	0.0380		2.0445	2.0445		1.8809	1.8809		3,685.6569	3,685.6569	1.1920		3,715.4573
Total	3.8882	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

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

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										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
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	0.0772	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	6.0400e-003		205.1296
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	6.0400e-003		205.1296

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307			0.0000			0.0000
Off-Road	3.8882	40.4971	21.1543	0.0380		2.0445	2.0445		1.8809	1.8809	0.0000	3,685.6569	3,685.6569	1.1920		3,715,4573
Total	3.8882	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

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

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										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
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	0.0772	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	6.0400e-003		205.1296
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	6.0400e-003		205.1296

3.4 Grading - 2021**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
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		1.8265	1.8265		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		6,007.0434	6,007.0434	1.9428		6,055.6134

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

3.4 Grading - 2021**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										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
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	0.0857	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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
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		1.8265	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

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

3.4 Grading - 2021**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										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
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	0.0857	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

3.4 Grading - 2022**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
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		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		6,011.4105	6,011.4105	1.9442		6,060.0158

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

3.4 Grading - 2022**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										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
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	0.0803	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		219.8941
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		219.8941

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
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	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

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

3.4 Grading - 2022**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										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
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	0.0803	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		219.8941
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		219.8941

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
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

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

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										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
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		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	0.2429		8,806.758 2
Total	3.6242	15.3350	33.1995	0.1247	9.8688	0.0949	9.9637	2.6381	0.0883	2.7263		12,697.23 39	12,697.23 39	0.4665		12,708.89 66

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
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

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

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										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
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		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	0.2429		8,806.758 2
Total	3.6242	15.3350	33.1995	0.1247	9.8688	0.0949	9.9637	2.6381	0.0883	2.7263		12,697.23 39	12,697.23 39	0.4665		12,708.89 66

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

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

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

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										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
Vendor	0.3027	10.0181	3.1014	0.0352	0.9156	0.0116	0.9271	0.2636	0.0111	0.2747		3,773.876 2	3,773.876 2	0.1982		3,778.830 0
Worker	3.0203	1.9287	27.4113	0.0851	8.9533	0.0681	9.0214	2.3745	0.0627	2.4372		8,478.440 8	8,478.440 8	0.2190		8,483.916 0
Total	3.3229	11.9468	30.5127	0.1203	9.8688	0.0797	9.9485	2.6381	0.0738	2.7118		12,252.31 70	12,252.31 70	0.4172		12,262.74 60

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
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	2,555.209 9	2,555.209 9	0.6079		2,570.406 1

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										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
Vendor	0.3027	10.0181	3.1014	0.0352	0.9156	0.0116	0.9271	0.2636	0.0111	0.2747		3,773.876 2	3,773.876 2	0.1982		3,778.830 0
Worker	3.0203	1.9287	27.4113	0.0851	8.9533	0.0681	9.0214	2.3745	0.0627	2.4372		8,478.440 8	8,478.440 8	0.2190		8,483.916 0
Total	3.3229	11.9468	30.5127	0.1203	9.8688	0.0797	9.9485	2.6381	0.0738	2.7118		12,252.31 70	12,252.31 70	0.4172		12,262.74 60

3.6 Paving - 2023**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
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	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		2,207.584 1	2,207.584 1	0.7140		2,225.433 6

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

3.6 Paving - 2023**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										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
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	0.0566	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		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		158.8748

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	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
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

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

3.6 Paving - 2023**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										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
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	0.0566	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		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		158.8748

3.6 Paving - 2024**Unmitigated Construction On-Site**

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

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

3.6 Paving - 2024**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										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
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	0.0535	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		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		153.9458

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
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
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	2,207.547 2	2,207.547 2	0.7140		2,225.396 3

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

3.6 Paving - 2024**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										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
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	0.0535	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		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		153.9458

3.7 Architectural Coating - 2024**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
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		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		281.8443

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

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										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
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	0.5707	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	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		1,641.085 2	1,641.085 2	0.0401		1,642.088 6

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
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

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

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										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
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	0.5707	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	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		1,641.085 2	1,641.085 2	0.0401		1,642.088 6

4.0 Operational Detail - Mobile**4.1 Mitigation Measures Mobile**

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
Category	lb/day										lb/day					
Mitigated	9.8489	45.4304	114.8495	0.4917	45.9592	0.3360	46.2951	12.2950	0.3119	12.6070		50,306.60 34	50,306.60 34	2.1807		50,361.12 08
Unmitigated	9.8489	45.4304	114.8495	0.4917	45.9592	0.3360	46.2951	12.2950	0.3119	12.6070		50,306.60 34	50,306.60 34	2.1807		50,361.12 08

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
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

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

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S 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	69.00	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

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
Category	lb/day										lb/day					
NaturalGas Mitigated	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.983 2	8,355.983 2	0.1602	0.1532	8,405.638 7
NaturalGas Unmitigated	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.983 2	8,355.983 2	0.1602	0.1532	8,405.638 7

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

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

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
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		131.6662	131.6662	2.5200e-003	2.4100e-003	132.4486
Apartments Mid Rise	35784.3	0.3859	3.2978	1.4033	0.0211		0.2666	0.2666		0.2666	0.2666		4,209.9164	4,209.9164	0.0807	0.0772	4,234.9339
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		150.9911	150.9911	2.8900e-003	2.7700e-003	151.8884
High Turnover (Sit Down Restaurant)	22759.9	0.2455	2.2314	1.8743	0.0134		0.1696	0.1696		0.1696	0.1696		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		561.1436	561.1436	0.0108	0.0103	564.4782
Quality Restaurant	5057.75	0.0545	0.4959	0.4165	2.9800e-003		0.0377	0.0377		0.0377	0.0377		595.0298	595.0298	0.0114	0.0109	598.5658
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		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		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387

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

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

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
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		131.6662	131.6662	2.5200e-003	2.4100e-003	132.4486
Apartments Mid Rise	35.7843	0.3859	3.2978	1.4033	0.0211		0.2666	0.2666		0.2666	0.2666		4,209.9164	4,209.9164	0.0807	0.0772	4,234.9339
General Office Building	1.28342	0.0138	0.1258	0.1057	7.5000e-004		9.5600e-003	9.5600e-003		9.5600e-003	9.5600e-003		150.9911	150.9911	2.8900e-003	2.7700e-003	151.8884
High Turnover (Sit Down Restaurant)	22.7599	0.2455	2.2314	1.8743	0.0134		0.1696	0.1696		0.1696	0.1696		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		561.1436	561.1436	0.0108	0.0103	564.4782
Quality Restaurant	5.05775	0.0545	0.4959	0.4165	2.9800e-003		0.0377	0.0377		0.0377	0.0377		595.0298	595.0298	0.0114	0.0109	598.5658
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		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		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387

6.0 Area Detail**6.1 Mitigation Measures Area**

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
Category	lb/day										lb/day					
Mitigated	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192
Unmitigated	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
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	0.0000	18,000.0000	18,000.0000	0.3450	0.3300	18,106.9650
Landscaping	2.4766	0.9496	82.4430	4.3600e-003		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	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192

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

6.2 Area by SubCategory**Mitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
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	0.0000	18,000.0000	18,000.0000	0.3450	0.3300	18,106.9650
Landscaping	2.4766	0.9496	82.4430	4.3600e-003		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	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192

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

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

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

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

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

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.

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

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

tblVehicleTrips	SU_TR	5.95	3.20
tblVehicleTrips	SU_TR	72.16	57.65
tblVehicleTrips	SU_TR	25.24	6.39
tblVehicleTrips	WD_TR	6.59	5.83
tblVehicleTrips	WD_TR	6.65	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

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

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
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	6,270.2214
2022	5.7218	38.9024	47.3319	0.1455	9.8688	1.6366	10.7736	3.6558	1.5057	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	0.4698	1.8628	0.4743	0.4322	0.5476	0.0000	2,352.4178	2,352.4178	0.7175	0.0000	2,370.3550
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	14,657.2663

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

2.1 Overall Construction (Maximum Daily Emission)

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
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	6,270.2214
2022	5.7218	38.9024	47.3319	0.1455	9.8688	1.6366	10.7736	3.6558	1.5057	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	0.4698	1.8628	0.4743	0.4322	0.5476	0.0000	2,352.4178	2,352.4178	0.7175	0.0000	2,370.3550
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	14,657.2663

[illegible]

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

2.2 Overall Operational**Unmitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.59 50	18,148.59 50	0.4874	0.3300	18,259.11 92
Energy	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.983 2	8,355.983 2	0.1602	0.1532	8,405.638 7
Mobile	9.5233	45.9914	110.0422	0.4681	45.9592	0.3373	46.2965	12.2950	0.3132	12.6083		47,917.80 05	47,917.80 05	2.1953		47,972.68 39
Total	40.7912	67.7872	202.7424	0.6043	45.9592	2.4640	48.4231	12.2950	2.4399	14.7349	0.0000	74,422.37 87	74,422.37 87	2.8429	0.4832	74,637.44 17

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.59 50	18,148.59 50	0.4874	0.3300	18,259.11 92
Energy	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.983 2	8,355.983 2	0.1602	0.1532	8,405.638 7
Mobile	9.5233	45.9914	110.0422	0.4681	45.9592	0.3373	46.2965	12.2950	0.3132	12.6083		47,917.80 05	47,917.80 05	2.1953		47,972.68 39
Total	40.7912	67.7872	202.7424	0.6043	45.9592	2.4640	48.4231	12.2950	2.4399	14.7349	0.0000	74,422.37 87	74,422.37 87	2.8429	0.4832	74,637.44 17

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
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

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

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

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

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
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		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

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

3.2 Demolition - 2021**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
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		1,430.693 2	1,430.693 2	0.0955		1,433.081 2

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
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	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	3,747.944 9	3,747.944 9	1.0549		3,774.317 4

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

3.2 Demolition - 2021**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
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		1,430.693 2	1,430.693 2	0.0955		1,433.081 2

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307			0.0000			0.0000
Off-Road	3.8882	40.4971	21.1543	0.0380		2.0445	2.0445		1.8809	1.8809		3,685.656 9	3,685.656 9	1.1920		3,715.457 3
Total	3.8882	40.4971	21.1543	0.0380	18.0663	2.0445	20.1107	9.9307	1.8809	11.8116		3,685.656 9	3,685.656 9	1.1920		3,715.457 3

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

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										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
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	0.0858	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
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

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307			0.0000			0.0000
Off-Road	3.8882	40.4971	21.1543	0.0380		2.0445	2.0445		1.8809	1.8809	0.0000	3,685.6569	3,685.6569	1.1920		3,715,4573
Total	3.8882	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

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

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										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
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	0.0858	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
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

3.4 Grading - 2021**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
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		1.8265	1.8265		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		6,007.0434	6,007.0434	1.9428		6,055.6134

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

3.4 Grading - 2021**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										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
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	0.0954	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		214.6080
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		214.6080

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
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		1.8265	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

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

3.4 Grading - 2021**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										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
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	0.0954	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		214.6080
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		214.6080

3.4 Grading - 2022**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
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		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		6,011.4105	6,011.4105	1.9442		6,060.0158

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

3.4 Grading - 2022**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										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
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	0.0896	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		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		207.0563

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
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	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

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

3.4 Grading - 2022**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										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
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	0.0896	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		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		207.0563

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
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

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

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										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
Vendor	0.4284	13.1673	3.8005	0.0354	0.9155	0.0256	0.9412	0.2636	0.0245	0.2881		3,789.0750	3,789.0750	0.2381		3,795.0283
Worker	3.5872	2.3593	27.1680	0.0832	8.9533	0.0701	9.0234	2.3745	0.0646	2.4390		8,286.9013	8,286.9013	0.2282		8,292.6058
Total	4.0156	15.5266	30.9685	0.1186	9.8688	0.0957	9.9645	2.6381	0.0891	2.7271		12,075.9763	12,075.9763	0.4663		12,087.6341

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	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
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

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

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										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
Vendor	0.4284	13.1673	3.8005	0.0354	0.9155	0.0256	0.9412	0.2636	0.0245	0.2881		3,789.075 0	3,789.075 0	0.2381		3,795.028 3
Worker	3.5872	2.3593	27.1680	0.0832	8.9533	0.0701	9.0234	2.3745	0.0646	2.4390		8,286.901 3	8,286.901 3	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		12,075.97 63	12,075.97 63	0.4663		12,087.63 41

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

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

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

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										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
Vendor	0.3183	9.9726	3.3771	0.0343	0.9156	0.0122	0.9277	0.2636	0.0116	0.2752		3,671.4007	3,671.4007	0.2096		3,676.6417
Worker	3.3795	2.1338	24.9725	0.0801	8.9533	0.0681	9.0214	2.3745	0.0627	2.4372		7,983.7318	7,983.7318	0.2055		7,988.8683
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	0.4151		11,665.5099

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
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

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

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										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
Vendor	0.3183	9.9726	3.3771	0.0343	0.9156	0.0122	0.9277	0.2636	0.0116	0.2752		3,671.4007	3,671.4007	0.2096		3,676.6417
Worker	3.3795	2.1338	24.9725	0.0801	8.9533	0.0681	9.0214	2.3745	0.0627	2.4372		7,983.7318	7,983.7318	0.2055		7,988.8683
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	0.4151		11,665.5099

3.6 Paving - 2023**Unmitigated Construction On-Site**

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

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

3.6 Paving - 2023**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										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
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	0.0633	0.0400	0.4677	1.5000e-003	0.1677	1.2800e-003	0.1689	0.0445	1.1700e-003	0.0456		149.5081	149.5081	3.8500e-003		149.6043
Total	0.0633	0.0400	0.4677	1.5000e-003	0.1677	1.2800e-003	0.1689	0.0445	1.1700e-003	0.0456		149.5081	149.5081	3.8500e-003		149.6043

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	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
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

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

3.6 Paving - 2023**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										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
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	0.0633	0.0400	0.4677	1.5000e-003	0.1677	1.2800e-003	0.1689	0.0445	1.1700e-003	0.0456		149.5081	149.5081	3.8500e-003		149.6043
Total	0.0633	0.0400	0.4677	1.5000e-003	0.1677	1.2800e-003	0.1689	0.0445	1.1700e-003	0.0456		149.5081	149.5081	3.8500e-003		149.6043

3.6 Paving - 2024**Unmitigated Construction On-Site**

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

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

3.6 Paving - 2024**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										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
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	0.0601	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		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		144.9587

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
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
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	2,207.547 2	2,207.547 2	0.7140		2,225.396 3

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

3.6 Paving - 2024**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										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
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	0.0601	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		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		144.9587

3.7 Architectural Coating - 2024**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
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		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		281.8443

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

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										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
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	0.6406	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	0.0376		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	0.0376		1,546.226 2

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
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

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

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										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
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	0.6406	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	0.0376		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	0.0376		1,546.226 2

4.0 Operational Detail - Mobile**4.1 Mitigation Measures Mobile**

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
Category	lb/day										lb/day					
Mitigated	9.5233	45.9914	110.0422	0.4681	45.9592	0.3373	46.2965	12.2950	0.3132	12.6083		47,917.8005	47,917.8005	2.1953		47,972.6839
Unmitigated	9.5233	45.9914	110.0422	0.4681	45.9592	0.3373	46.2965	12.2950	0.3132	12.6083		47,917.8005	47,917.8005	2.1953		47,972.6839

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
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

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-NW	H-W or C-W	H-S 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	69.00	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

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
Category	lb/day										lb/day					
NaturalGas Mitigated	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.983 2	8,355.983 2	0.1602	0.1532	8,405.638 7
NaturalGas Unmitigated	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.983 2	8,355.983 2	0.1602	0.1532	8,405.638 7

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

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

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
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		131.6662	131.6662	2.5200e-003	2.4100e-003	132.4486
Apartments Mid Rise	35784.3	0.3859	3.2978	1.4033	0.0211		0.2666	0.2666		0.2666	0.2666		4,209.9164	4,209.9164	0.0807	0.0772	4,234.9339
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		150.9911	150.9911	2.8900e-003	2.7700e-003	151.8884
High Turnover (Sit Down Restaurant)	22759.9	0.2455	2.2314	1.8743	0.0134		0.1696	0.1696		0.1696	0.1696		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		561.1436	561.1436	0.0108	0.0103	564.4782
Quality Restaurant	5057.75	0.0545	0.4959	0.4165	2.9800e-003		0.0377	0.0377		0.0377	0.0377		595.0298	595.0298	0.0114	0.0109	598.5658
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		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		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387

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

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

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
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		131.6662	131.6662	2.5200e-003	2.4100e-003	132.4486
Apartments Mid Rise	35.7843	0.3859	3.2978	1.4033	0.0211		0.2666	0.2666		0.2666	0.2666		4,209.9164	4,209.9164	0.0807	0.0772	4,234.9339
General Office Building	1.28342	0.0138	0.1258	0.1057	7.5000e-004		9.5600e-003	9.5600e-003		9.5600e-003	9.5600e-003		150.9911	150.9911	2.8900e-003	2.7700e-003	151.8884
High Turnover (Sit Down Restaurant)	22.7599	0.2455	2.2314	1.8743	0.0134		0.1696	0.1696		0.1696	0.1696		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		561.1436	561.1436	0.0108	0.0103	564.4782
Quality Restaurant	5.05775	0.0545	0.4959	0.4165	2.9800e-003		0.0377	0.0377		0.0377	0.0377		595.0298	595.0298	0.0114	0.0109	598.5658
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		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		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387

6.0 Area Detail**6.1 Mitigation Measures Area**

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
Category	lb/day										lb/day					
Mitigated	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192
Unmitigated	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
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	0.0000	18,000.0000	18,000.0000	0.3450	0.3300	18,106.9650
Landscaping	2.4766	0.9496	82.4430	4.3600e-003		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	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192

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

6.2 Area by SubCategory**Mitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
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	0.0000	18,000.0000	18,000.0000	0.3450	0.3300	18,106.9650
Landscaping	2.4766	0.9496	82.4430	4.3600e-003		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	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192

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

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

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

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

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

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

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

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
tblVehicleTrips	SU_TR	5.95	3.20
tblVehicleTrips	SU_TR	72.16	57.65
tblVehicleTrips	SU_TR	25.24	6.39
tblVehicleTrips	WD_TR	6.59	5.83
tblVehicleTrips	WD_TR	6.65	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

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

2.1 Overall Construction**Unmitigated Construction**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
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	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	1,418.6554	1,418.6554	0.1215	0.0000	1,421.6925
2023	0.5190	3.2850	4.7678	0.0147	0.8497	0.0971	0.9468	0.2283	0.0912	0.3195	0.0000	1,342.4412	1,342.4412	0.1115	0.0000	1,345.2291
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	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	1,418.6554	1,418.6554	0.1215	0.0000	1,421.6925

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

2.1 Overall Construction**Mitigated Construction**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2021	0.1704	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	212.2658
2022	0.5865	4.0240	5.1546	0.0155	0.9509	0.1175	1.0683	0.2518	0.1103	0.3621	0.0000	1,418.6550	1,418.6550	0.1215	0.0000	1,421.6921
2023	0.5190	3.2850	4.7678	0.0147	0.8497	0.0971	0.9468	0.2283	0.0912	0.3195	0.0000	1,342.4409	1,342.4409	0.1115	0.0000	1,345.2287
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	44.6354	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	1,418.6550	1,418.6550	0.1215	0.0000	1,421.6921

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	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	0.9831	0.9831

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9	9-1-2023	11-30-2023	0.9798	0.9798
10	12-1-2023	2-29-2024	2.8757	2.8757
11	3-1-2024	5-31-2024	1.6188	1.6188
		Highest	2.8757	2.8757

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
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	0.1398	1.2312	0.7770	7.6200e-003		0.0966	0.0966		0.0966	0.0966	0.0000	3,896.0732	3,896.0732	0.1303	0.0468	3,913.2833
Mobile	1.5857	7.9962	19.1834	0.0821	7.7979	0.0580	7.8559	2.0895	0.0539	2.1434	0.0000	7,620.4986	7,620.4986	0.3407	0.0000	7,629.0162
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	236.9712	12,294.1807	12,531.1519	15.7904	0.1260	12,963.4751

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2.2 Overall Operational**Mitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
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	0.1398	1.2312	0.7770	7.6200e-003		0.0966	0.0966		0.0966	0.0966	0.0000	3,896.0732	3,896.0732	0.1303	0.0468	3,913.2833
Mobile	1.5857	7.9962	19.1834	0.0821	7.7979	0.0580	7.8559	2.0895	0.0539	2.1434	0.0000	7,620.4986	7,620.4986	0.3407	0.0000	7,629.0162
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	236.9712	12,294.1807	12,531.1519	15.7904	0.1260	12,963.4751

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

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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

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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

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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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0496	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

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3.2 Demolition - 2021**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	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	17.4566	17.4566	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	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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0496	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	51.0011	51.0011	0.0144	0.0000	51.3600
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

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3.2 Demolition - 2021**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	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	17.4566	17.4566	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	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**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.1807	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

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

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.1807	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	33.7060
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	33.7060

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

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.1741	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	103.5405	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

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3.4 Grading - 2021**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	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	2.0000e-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	2.0000e-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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.1741	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

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3.4 Grading - 2021**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	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	2.0000e-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	2.0000e-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**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0807	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		5.2600e-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

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3.4 Grading - 2022**Unmitigated Construction Off-Site**

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0807	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		5.2600e-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

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3.4 Grading - 2022**Mitigated Construction Off-Site**

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

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

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	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	663.9936	663.9936	0.0187	0.0000	664.4604
Total	0.3578	1.9125	2.9812	0.0119	0.8696	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

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

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	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	663.9936	663.9936	0.0187	0.0000	664.4604
Total	0.3578	1.9125	2.9812	0.0119	0.8696	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

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1942	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

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	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	0.1113	1.4600e-003	0.1127	0.0321	1.4000e-003	0.0335	0.0000	417.9930	417.9930	0.0228	0.0000	418.5624
Worker	0.2795	0.1910	2.2635	6.9100e-003	0.7377	5.9100e-003	0.7436	0.1960	5.4500e-003	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	7.3700e-003	0.8564	0.2281	6.8500e-003	0.2349	0.0000	1,042.5294	1,042.5294	0.0392	0.0000	1,043.5090

Mitigated Construction On-Site

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

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	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	0.1113	1.4600e-003	0.1127	0.0321	1.4000e-003	0.0335	0.0000	417.9930	417.9930	0.0228	0.0000	418.5624
Worker	0.2795	0.1910	2.2635	6.9100e-003	0.7377	5.9100e-003	0.7436	0.1960	5.4500e-003	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	7.3700e-003	0.8564	0.2281	6.8500e-003	0.2349	0.0000	1,042.5294	1,042.5294	0.0392	0.0000	1,043.5090

3.6 Paving - 2023**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	6.7100e-003	0.0663	0.0948	1.5000e-004		3.3200e-003	3.3200e-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	0.0663	0.0948	1.5000e-004		3.3200e-003	3.3200e-003		3.0500e-003	3.0500e-003	0.0000	13.0175	13.0175	4.2100e-003	0.0000	13.1227

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3.6 Paving - 2023**Unmitigated Construction Off-Site**

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	6.7100e-003	0.0663	0.0948	1.5000e-004		3.3200e-003	3.3200e-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	0.0663	0.0948	1.5000e-004		3.3200e-003	3.3200e-003		3.0500e-003	3.0500e-003	0.0000	13.0175	13.0175	4.2100e-003	0.0000	13.1227

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3.6 Paving - 2023**Mitigated Construction Off-Site**

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

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

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3.6 Paving - 2024**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	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	2.9000e-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	1.0094	1.0094	3.0000e-005	0.0000	1.0100
Total	4.4000e-004	2.9000e-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	1.0094	1.0094	3.0000e-005	0.0000	1.0100

Mitigated Construction On-Site

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

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3.6 Paving - 2024**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	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	2.9000e-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	1.0094	1.0094	3.0000e-005	0.0000	1.0100
Total	4.4000e-004	2.9000e-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	1.0094	1.0094	3.0000e-005	0.0000	1.0100

3.7 Architectural Coating - 2024**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
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	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	0.0000	4.4682	4.4682	2.5000e-004	0.0000	4.4745

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	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	4.9300e-003	0.0596	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	17.1394
Total	7.4800e-003	4.9300e-003	0.0596	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	17.1394

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	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	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	0.0000	4.4682	4.4682	2.5000e-004	0.0000	4.4745

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	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	4.9300e-003	0.0596	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	17.1394
Total	7.4800e-003	4.9300e-003	0.0596	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	17.1394

4.0 Operational Detail - Mobile**4.1 Mitigation Measures Mobile**

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	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	1.5857	7.9962	19.1834	0.0821	7.7979	0.0580	7.8559	2.0895	0.0539	2.1434	0.0000	7,620.498 6	7,620.498 6	0.3407	0.0000	7,629.016 2
Unmitigated	1.5857	7.9962	19.1834	0.0821	7.7979	0.0580	7.8559	2.0895	0.0539	2.1434	0.0000	7,620.498 6	7,620.498 6	0.3407	0.0000	7,629.016 2

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
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

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Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S 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	69.00	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

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

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

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Apartments Low Rise	408494	2.2000e-003	0.0188	8.0100e-003	1.2000e-004		1.5200e-003	1.5200e-003		1.5200e-003	1.5200e-003	0.0000	21.7988	21.7988	4.2000e-004	4.0000e-004	21.9284
Apartments Mid Rise	1.30613e+007	0.0704	0.6018	0.2561	3.8400e-003		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	1.7500e-003	0.0000	24.9983	24.9983	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	0.0000	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	6.4900e-003	0.0000	92.9036	92.9036	1.7800e-003	1.7000e-003	93.4557
Quality Restaurant	1.84608e+006	9.9500e-003	0.0905	0.0760	5.4000e-004		6.8800e-003	6.8800e-003		6.8800e-003	6.8800e-003	0.0000	98.5139	98.5139	1.8900e-003	1.8100e-003	99.0993
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	3.4000e-004	0.0000	4.9009	4.9009	9.0000e-005	9.0000e-005	4.9301
Total		0.1398	1.2312	0.7770	7.6200e-003		0.0966	0.0966		0.0966	0.0966	0.0000	1,383.4268	1,383.4268	0.0265	0.0254	1,391.6478

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

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Apartments Low Rise	408494	2.2000e-003	0.0188	8.0100e-003	1.2000e-004		1.5200e-003	1.5200e-003		1.5200e-003	1.5200e-003	0.0000	21.7988	21.7988	4.2000e-004	4.0000e-004	21.9284
Apartments Mid Rise	1.30613e+007	0.0704	0.6018	0.2561	3.8400e-003		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	1.7500e-003	0.0000	24.9983	24.9983	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	0.0000	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	6.4900e-003	0.0000	92.9036	92.9036	1.7800e-003	1.7000e-003	93.4557
Quality Restaurant	1.84608e+006	9.9500e-003	0.0905	0.0760	5.4000e-004		6.8800e-003	6.8800e-003		6.8800e-003	6.8800e-003	0.0000	98.5139	98.5139	1.8900e-003	1.8100e-003	99.0993
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	3.4000e-004	0.0000	4.9009	4.9009	9.0000e-005	9.0000e-005	4.9301
Total		0.1398	1.2312	0.7770	7.6200e-003		0.0966	0.0966		0.0966	0.0966	0.0000	1,383.4268	1,383.4268	0.0265	0.0254	1,391.6478

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5.3 Energy by Land Use - Electricity**Unmitigated**

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Apartments Low Rise	106010	33.7770	1.3900e-003	2.9000e-004	33.8978
Apartments Mid Rise	3.94697e+006	1,257.5879	0.0519	0.0107	1,262.0869
General Office Building	584550	186.2502	7.6900e-003	1.5900e-003	186.9165
High Turnover (Sit Down Restaurant)	1.58904e+006	506.3022	0.0209	4.3200e-003	508.1135
Hotel	550308	175.3399	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		2,512.6465	0.1037	0.0215	2,521.6356

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5.3 Energy by Land Use - Electricity**Mitigated**

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Apartments Low Rise	106010	33.7770	1.3900e-003	2.9000e-004	33.8978
Apartments Mid Rise	3.94697e+006	1,257.5879	0.0519	0.0107	1,262.0869
General Office Building	584550	186.2502	7.6900e-003	1.5900e-003	186.9165
High Turnover (Sit Down Restaurant)	1.58904e+006	506.3022	0.0209	4.3200e-003	508.1135
Hotel	550308	175.3399	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		2,512.6465	0.1037	0.0215	2,521.6356

6.0 Area Detail**6.1 Mitigation Measures Area**

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

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
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
Hearth	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	205.3295
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

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6.2 Area by SubCategory**Mitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
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
Hearth	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	205.3295
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**

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

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7.2 Water by Land Use**Unmitigated**

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Apartments Low Rise	1.62885 / 1.02688	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	7.99802 / 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 / 0.154996	11.3934	0.0796	1.9600e-003	13.9663
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

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7.2 Water by Land Use**Mitigated**

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Apartments Low Rise	1.62885 / 1.02688	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	7.99802 / 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 / 0.154996	11.3934	0.0796	1.9600e-003	13.9663
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**

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Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	207.8079	12.2811	0.0000	514.8354
Unmitigated	207.8079	12.2811	0.0000	514.8354

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

8.2 Waste by Land Use**Unmitigated**

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Apartments Low Rise	11.5	2.3344	0.1380	0.0000	5.7834
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	5.1393	0.0000	215.4430
Hotel	27.38	5.5579	0.3285	0.0000	13.7694
Quality Restaurant	7.3	1.4818	0.0876	0.0000	3.6712
Regional Shopping Center	58.8	11.9359	0.7054	0.0000	29.5706
Total		207.8079	12.2811	0.0000	514.8354

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

8.2 Waste by Land Use**Mitigated**

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Apartments Low Rise	11.5	2.3344	0.1380	0.0000	5.7834
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	5.1393	0.0000	215.4430
Hotel	27.38	5.5579	0.3285	0.0000	13.7694
Quality Restaurant	7.3	1.4818	0.0876	0.0000	3.6712
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

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

Boilers

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

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

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

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/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

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

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

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

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
tblVehicleTrips	SU_TR	5.95	3.20
tblVehicleTrips	SU_TR	72.16	57.65
tblVehicleTrips	SU_TR	25.24	6.39
tblVehicleTrips	WD_TR	6.59	5.83
tblVehicleTrips	WD_TR	6.65	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

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

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	4.2561	46.4415	31.4494	0.0636	18.2032	2.0456	20.2488	9.9670	1.8820	11.8490	0.0000	6,163.416 6	6,163.416 6	1.9475	0.0000	6,212.103 9
2022	4.5441	38.8811	40.8776	0.1240	8.8255	1.6361	10.4616	3.6369	1.5052	5.1421	0.0000	12,493.44 03	12,493.44 03	1.9485	0.0000	12,518.57 07
2023	4.1534	25.7658	38.7457	0.1206	7.0088	0.7592	7.7679	1.8799	0.7136	2.5935	0.0000	12,150.48 90	12,150.48 90	0.9589	0.0000	12,174.46 15
2024	237.0219	9.5478	14.9642	0.0239	1.2171	0.4694	1.2875	0.3229	0.4319	0.4621	0.0000	2,313.180 8	2,313.180 8	0.7166	0.0000	2,331.095 6
Maximum	237.0219	46.4415	40.8776	0.1240	18.2032	2.0456	20.2488	9.9670	1.8820	11.8490	0.0000	12,493.44 03	12,493.44 03	1.9485	0.0000	12,518.57 07

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

2.1 Overall Construction (Maximum Daily Emission)

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	4.2561	46.4415	31.4494	0.0636	18.2032	2.0456	20.2488	9.9670	1.8820	11.8490	0.0000	6,163.4166	6,163.4166	1.9475	0.0000	6,212.1039
2022	4.5441	38.8811	40.8776	0.1240	8.8255	1.6361	10.4616	3.6369	1.5052	5.1421	0.0000	12,493.4403	12,493.4403	1.9485	0.0000	12,518.5707
2023	4.1534	25.7658	38.7457	0.1206	7.0088	0.7592	7.7679	1.8799	0.7136	2.5935	0.0000	12,150.4890	12,150.4890	0.9589	0.0000	12,174.4615
2024	237.0219	9.5478	14.9642	0.0239	1.2171	0.4694	1.2875	0.3229	0.4319	0.4621	0.0000	2,313.1808	2,313.1808	0.7166	0.0000	2,331.0955
Maximum	237.0219	46.4415	40.8776	0.1240	18.2032	2.0456	20.2488	9.9670	1.8820	11.8490	0.0000	12,493.4403	12,493.4403	1.9485	0.0000	12,518.5707

[illegible]

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

2.2 Overall Operational**Unmitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.59 50	18,148.59 50	0.4874	0.3300	18,259.11 92
Energy	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.983 2	8,355.983 2	0.1602	0.1532	8,405.638 7
Mobile	9.8489	45.4304	114.8495	0.4917	45.9592	0.3360	46.2951	12.2950	0.3119	12.6070		50,306.60 34	50,306.60 34	2.1807		50,361.12 08
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 16	76,811.18 16	2.8282	0.4832	77,025.87 86

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.59 50	18,148.59 50	0.4874	0.3300	18,259.11 92
Energy	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.983 2	8,355.983 2	0.1602	0.1532	8,405.638 7
Mobile	9.8489	45.4304	114.8495	0.4917	45.9592	0.3360	46.2951	12.2950	0.3119	12.6070		50,306.60 34	50,306.60 34	2.1807		50,361.12 08
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 16	76,811.18 16	2.8282	0.4832	77,025.87 86

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
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

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

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

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

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
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		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

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

3.2 Demolition - 2021**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
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		1,409.521 2	1,409.521 2	0.0912		1,411.801 5

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
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	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	3,747.944 9	3,747.944 9	1.0549		3,774.317 4

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

3.2 Demolition - 2021**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
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		1,409.521 2	1,409.521 2	0.0912		1,411.801 5

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307			0.0000			0.0000
Off-Road	3.8882	40.4971	21.1543	0.0380		2.0445	2.0445		1.8809	1.8809		3,685.656 9	3,685.656 9	1.1920		3,715.457 3
Total	3.8882	40.4971	21.1543	0.0380	18.0663	2.0445	20.1107	9.9307	1.8809	11.8116		3,685.656 9	3,685.656 9	1.1920		3,715.457 3

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

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										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
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	0.0584	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		140.8414
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		140.8414

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307			0.0000			0.0000
Off-Road	3.8882	40.4971	21.1543	0.0380		2.0445	2.0445		1.8809	1.8809	0.0000	3,685.6569	3,685.6569	1.1920		3,715,4573
Total	3.8882	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

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

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										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
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	0.0584	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		140.8414
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		140.8414

3.4 Grading - 2021**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
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		1.8265	1.8265		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		6,007.0434	6,007.0434	1.9428		6,055.6134

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

3.4 Grading - 2021**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										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
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	0.0649	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		156.4904
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		156.4904

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
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		1.8265	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

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

3.4 Grading - 2021**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										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
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	0.0649	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		156.4904
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		156.4904

3.4 Grading - 2022**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
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		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		6,011.4105	6,011.4105	1.9442		6,060.0158

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

3.4 Grading - 2022**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										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
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	0.0607	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		150.9813
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		150.9813

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
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	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

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

3.4 Grading - 2022**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										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
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	0.0607	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		150.9813
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		150.9813

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
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

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

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										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
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		3,902.138 4
Worker	2.4299	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		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		9,948.938 4

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
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

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

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										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
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		3,902.138 4
Worker	2.4299	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		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		9,948.938 4

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

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

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

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										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
Vendor	0.3027	10.0181	3.1014	0.0352	0.9156	0.0116	0.9271	0.2636	0.0111	0.2747		3,773.876 2	3,773.876 2	0.1982		3,778.830 0
Worker	2.2780	1.3628	19.4002	0.0584	6.0932	0.0479	6.1411	1.6163	0.0441	1.6604		5,821.402 8	5,821.402 8	0.1529		5,825.225 4
Total	2.5807	11.3809	22.5017	0.0936	7.0088	0.0595	7.0682	1.8799	0.0552	1.9350		9,595.279 0	9,595.279 0	0.3511		9,604.055 4

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
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	2,555.209 9	2,555.209 9	0.6079		2,570.406 1

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

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										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
Vendor	0.3027	10.0181	3.1014	0.0352	0.9156	0.0116	0.9271	0.2636	0.0111	0.2747		3,773.876 2	3,773.876 2	0.1982		3,778.830 0
Worker	2.2780	1.3628	19.4002	0.0584	6.0932	0.0479	6.1411	1.6163	0.0441	1.6604		5,821.402 8	5,821.402 8	0.1529		5,825.225 4
Total	2.5807	11.3809	22.5017	0.0936	7.0088	0.0595	7.0682	1.8799	0.0552	1.9350		9,595.279 0	9,595.279 0	0.3511		9,604.055 4

3.6 Paving - 2023**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
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	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		2,207.584 1	2,207.584 1	0.7140		2,225.433 6

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

3.6 Paving - 2023**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										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
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	0.0427	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		109.0866
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		109.0866

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	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
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

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

3.6 Paving - 2023**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										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
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	0.0427	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		109.0866
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		109.0866

3.6 Paving - 2024**Unmitigated Construction On-Site**

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

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

3.6 Paving - 2024**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										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
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	0.0403	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
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

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
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
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	2,207.547 2	2,207.547 2	0.7140		2,225.396 3

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

3.6 Paving - 2024**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										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
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	0.0403	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
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

3.7 Architectural Coating - 2024**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
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		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		281.8443

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

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										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
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	0.4296	0.2481	3.6098	0.0113	1.2171	9.4300e-003	1.2266	0.3229	8.6800e-003	0.3315		1,126.7583	1,126.7583	0.0280		1,127.4583
Total	0.4296	0.2481	3.6098	0.0113	1.2171	9.4300e-003	1.2266	0.3229	8.6800e-003	0.3315		1,126.7583	1,126.7583	0.0280		1,127.4583

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
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

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

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										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
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	0.4296	0.2481	3.6098	0.0113	1.2171	9.4300e-003	1.2266	0.3229	8.6800e-003	0.3315		1,126.7583	1,126.7583	0.0280		1,127.4583
Total	0.4296	0.2481	3.6098	0.0113	1.2171	9.4300e-003	1.2266	0.3229	8.6800e-003	0.3315		1,126.7583	1,126.7583	0.0280		1,127.4583

4.0 Operational Detail - Mobile**4.1 Mitigation Measures Mobile**

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
Category	lb/day										lb/day					
Mitigated	9.8489	45.4304	114.8495	0.4917	45.9592	0.3360	46.2951	12.2950	0.3119	12.6070		50,306.60 34	50,306.60 34	2.1807		50,361.12 08
Unmitigated	9.8489	45.4304	114.8495	0.4917	45.9592	0.3360	46.2951	12.2950	0.3119	12.6070		50,306.60 34	50,306.60 34	2.1807		50,361.12 08

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
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

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

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S 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	69.00	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

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
Category	lb/day										lb/day					
NaturalGas Mitigated	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.983 2	8,355.983 2	0.1602	0.1532	8,405.638 7
NaturalGas Unmitigated	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.983 2	8,355.983 2	0.1602	0.1532	8,405.638 7

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

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

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
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		131.6662	131.6662	2.5200e-003	2.4100e-003	132.4486
Apartments Mid Rise	35784.3	0.3859	3.2978	1.4033	0.0211		0.2666	0.2666		0.2666	0.2666		4,209.9164	4,209.9164	0.0807	0.0772	4,234.9339
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		150.9911	150.9911	2.8900e-003	2.7700e-003	151.8884
High Turnover (Sit Down Restaurant)	22759.9	0.2455	2.2314	1.8743	0.0134		0.1696	0.1696		0.1696	0.1696		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		561.1436	561.1436	0.0108	0.0103	564.4782
Quality Restaurant	5057.75	0.0545	0.4959	0.4165	2.9800e-003		0.0377	0.0377		0.0377	0.0377		595.0298	595.0298	0.0114	0.0109	598.5658
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		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		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387

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

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

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
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		131.6662	131.6662	2.5200e-003	2.4100e-003	132.4486
Apartments Mid Rise	35.7843	0.3859	3.2978	1.4033	0.0211		0.2666	0.2666		0.2666	0.2666		4,209.9164	4,209.9164	0.0807	0.0772	4,234.9339
General Office Building	1.28342	0.0138	0.1258	0.1057	7.5000e-004		9.5600e-003	9.5600e-003		9.5600e-003	9.5600e-003		150.9911	150.9911	2.8900e-003	2.7700e-003	151.8884
High Turnover (Sit Down Restaurant)	22.7599	0.2455	2.2314	1.8743	0.0134		0.1696	0.1696		0.1696	0.1696		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		561.1436	561.1436	0.0108	0.0103	564.4782
Quality Restaurant	5.05775	0.0545	0.4959	0.4165	2.9800e-003		0.0377	0.0377		0.0377	0.0377		595.0298	595.0298	0.0114	0.0109	598.5658
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		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		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387

6.0 Area Detail**6.1 Mitigation Measures Area**

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
Category	lb/day										lb/day					
Mitigated	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192
Unmitigated	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
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	0.0000	18,000.0000	18,000.0000	0.3450	0.3300	18,106.9650
Landscaping	2.4766	0.9496	82.4430	4.3600e-003		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	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192

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

6.2 Area by SubCategory**Mitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
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	0.0000	18,000.0000	18,000.0000	0.3450	0.3300	18,106.9650
Landscaping	2.4766	0.9496	82.4430	4.3600e-003		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	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192

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

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

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

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

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

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

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

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
tblVehicleTrips	SU_TR	5.95	3.20
tblVehicleTrips	SU_TR	72.16	57.65
tblVehicleTrips	SU_TR	25.24	6.39
tblVehicleTrips	WD_TR	6.59	5.83
tblVehicleTrips	WD_TR	6.65	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

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

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	4.2621	46.4460	31.4068	0.0635	18.2032	2.0456	20.2488	9.9670	1.8820	11.8490	0.0000	6,154.3377	6,154.3377	1.9472	0.0000	6,203.0186
2022	4.7966	38.8851	39.6338	0.1195	8.8255	1.6361	10.4616	3.6369	1.5052	5.1421	0.0000	12,035.3440	12,035.3440	1.9482	0.0000	12,060.6013
2023	4.3939	25.8648	37.5031	0.1162	7.0088	0.7598	7.7685	1.8799	0.7142	2.5940	0.0000	11,710.4080	11,710.4080	0.9617	0.0000	11,734.4497
2024	237.0656	9.5503	14.9372	0.0238	1.2171	0.4694	1.2875	0.3229	0.4319	0.4621	0.0000	2,307.0517	2,307.0517	0.7164	0.0000	2,324.9627
Maximum	237.0656	46.4460	39.6338	0.1195	18.2032	2.0456	20.2488	9.9670	1.8820	11.8490	0.0000	12,035.3440	12,035.3440	1.9482	0.0000	12,060.6013

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

2.1 Overall Construction (Maximum Daily Emission)

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	4.2621	46.4460	31.4068	0.0635	18.2032	2.0456	20.2488	9.9670	1.8820	11.8490	0.0000	6,154.3377	6,154.3377	1.9472	0.0000	6,203.0186
2022	4.7966	38.8851	39.6338	0.1195	8.8255	1.6361	10.4616	3.6369	1.5052	5.1421	0.0000	12,035.3440	12,035.3440	1.9482	0.0000	12,060.6013
2023	4.3939	25.8648	37.5031	0.1162	7.0088	0.7598	7.7685	1.8799	0.7142	2.5940	0.0000	11,710.4080	11,710.4080	0.9617	0.0000	11,734.4497
2024	237.0656	9.5503	14.9372	0.0238	1.2171	0.4694	1.2875	0.3229	0.4319	0.4621	0.0000	2,307.0517	2,307.0517	0.7164	0.0000	2,324.9627
Maximum	237.0656	46.4460	39.6338	0.1195	18.2032	2.0456	20.2488	9.9670	1.8820	11.8490	0.0000	12,035.3440	12,035.3440	1.9482	0.0000	12,060.6013

[illegible]

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

2.2 Overall Operational**Unmitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.59 50	18,148.59 50	0.4874	0.3300	18,259.11 92
Energy	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.983 2	8,355.983 2	0.1602	0.1532	8,405.638 7
Mobile	9.5233	45.9914	110.0422	0.4681	45.9592	0.3373	46.2965	12.2950	0.3132	12.6083		47,917.80 05	47,917.80 05	2.1953		47,972.68 39
Total	40.7912	67.7872	202.7424	0.6043	45.9592	2.4640	48.4231	12.2950	2.4399	14.7349	0.0000	74,422.37 87	74,422.37 87	2.8429	0.4832	74,637.44 17

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.59 50	18,148.59 50	0.4874	0.3300	18,259.11 92
Energy	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.983 2	8,355.983 2	0.1602	0.1532	8,405.638 7
Mobile	9.5233	45.9914	110.0422	0.4681	45.9592	0.3373	46.2965	12.2950	0.3132	12.6083		47,917.80 05	47,917.80 05	2.1953		47,972.68 39
Total	40.7912	67.7872	202.7424	0.6043	45.9592	2.4640	48.4231	12.2950	2.4399	14.7349	0.0000	74,422.37 87	74,422.37 87	2.8429	0.4832	74,637.44 17

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
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

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

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

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

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
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		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

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

3.2 Demolition - 2021**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
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	0.0532	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 2	1,380.326 2	0.0941		1,382.679 1

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
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	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	3,747.944 9	3,747.944 9	1.0549		3,774.317 4

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

3.2 Demolition - 2021**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
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	0.0532	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 2	1,380.326 2	0.0941		1,382.679 1

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307			0.0000			0.0000
Off-Road	3.8882	40.4971	21.1543	0.0380		2.0445	2.0445		1.8809	1.8809		3,685.656 9	3,685.656 9	1.1920		3,715.457 3
Total	3.8882	40.4971	21.1543	0.0380	18.0663	2.0445	20.1107	9.9307	1.8809	11.8116		3,685.656 9	3,685.656 9	1.1920		3,715.457 3

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

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										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
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	0.0638	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	3.9900e-003		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	3.9900e-003		132.6646

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307			0.0000			0.0000
Off-Road	3.8882	40.4971	21.1543	0.0380		2.0445	2.0445		1.8809	1.8809	0.0000	3,685.6569	3,685.6569	1.1920		3,715.4573
Total	3.8882	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

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

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										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
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	0.0638	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	3.9900e-003		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	3.9900e-003		132.6646

3.4 Grading - 2021**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
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		1.8265	1.8265		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		6,007.0434	6,007.0434	1.9428		6,055.6134

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

3.4 Grading - 2021**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										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
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	0.0709	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		147.4051
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		147.4051

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
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		1.8265	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

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

3.4 Grading - 2021**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										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
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	0.0709	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		147.4051
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		147.4051

3.4 Grading - 2022**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
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		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		6,011.4105	6,011.4105	1.9442		6,060.0158

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3.4 Grading - 2022**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										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
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	0.0665	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		142.2207
Total	0.0665	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		142.2207

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
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	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

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

3.4 Grading - 2022**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										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
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	0.0665	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		142.2207
Total	0.0665	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		142.2207

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
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

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

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										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
Vendor	0.4284	13.1673	3.8005	0.0354	0.9155	0.0256	0.9412	0.2636	0.0245	0.2881		3,789.075 0	3,789.075 0	0.2381		3,795.028 3
Worker	2.6620	1.6677	19.4699	0.0571	6.0932	0.0493	6.1425	1.6163	0.0454	1.6617		5,691.935 4	5,691.935 4	0.1602		5,695.940 8
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 4	0.3984		9,490.969 1

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
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

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

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										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
Vendor	0.4284	13.1673	3.8005	0.0354	0.9155	0.0256	0.9412	0.2636	0.0245	0.2881		3,789.075 0	3,789.075 0	0.2381		3,795.028 3
Worker	2.6620	1.6677	19.4699	0.0571	6.0932	0.0493	6.1425	1.6163	0.0454	1.6617		5,691.935 4	5,691.935 4	0.1602		5,695.940 8
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 4	0.3984		9,490.969 1

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

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

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

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										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
Vendor	0.3183	9.9726	3.3771	0.0343	0.9156	0.0122	0.9277	0.2636	0.0116	0.2752		3,671.4007	3,671.4007	0.2096		3,676.6417
Worker	2.5029	1.5073	17.8820	0.0550	6.0932	0.0479	6.1411	1.6163	0.0441	1.6604		5,483.7974	5,483.7974	0.1442		5,487.4020
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	0.3538		9,164.0437

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
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

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

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										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
Vendor	0.3183	9.9726	3.3771	0.0343	0.9156	0.0122	0.9277	0.2636	0.0116	0.2752		3,671.4007	3,671.4007	0.2096		3,676.6417
Worker	2.5029	1.5073	17.8820	0.0550	6.0932	0.0479	6.1411	1.6163	0.0441	1.6604		5,483.7974	5,483.7974	0.1442		5,487.4020
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	0.3538		9,164.0437

3.6 Paving - 2023**Unmitigated Construction On-Site**

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

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

3.6 Paving - 2023**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										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
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	0.0469	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		102.7603
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		102.7603

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	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
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

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

3.6 Paving - 2023**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										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
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	0.0469	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		102.7603
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		102.7603

3.6 Paving - 2024**Unmitigated Construction On-Site**

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

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

3.6 Paving - 2024**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										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
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	0.0444	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		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		99.5663

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
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
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	2,207.547 2	2,207.547 2	0.7140		2,225.396 3

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

3.6 Paving - 2024**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										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
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	0.0444	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		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		99.5663

3.7 Architectural Coating - 2024**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
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		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		281.8443

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

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										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
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	0.4734	0.2743	3.3220	0.0107	1.2171	9.4300e-003	1.2266	0.3229	8.6800e-003	0.3315		1,061.3818	1,061.3818	0.0264		1,062.0410
Total	0.4734	0.2743	3.3220	0.0107	1.2171	9.4300e-003	1.2266	0.3229	8.6800e-003	0.3315		1,061.3818	1,061.3818	0.0264		1,062.0410

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
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

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

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										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
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	0.4734	0.2743	3.3220	0.0107	1.2171	9.4300e-003	1.2266	0.3229	8.6800e-003	0.3315		1,061.3818	1,061.3818	0.0264		1,062.0410
Total	0.4734	0.2743	3.3220	0.0107	1.2171	9.4300e-003	1.2266	0.3229	8.6800e-003	0.3315		1,061.3818	1,061.3818	0.0264		1,062.0410

4.0 Operational Detail - Mobile**4.1 Mitigation Measures Mobile**

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
Category	lb/day										lb/day					
Mitigated	9.5233	45.9914	110.0422	0.4681	45.9592	0.3373	46.2965	12.2950	0.3132	12.6083		47,917.8005	47,917.8005	2.1953		47,972.6839
Unmitigated	9.5233	45.9914	110.0422	0.4681	45.9592	0.3373	46.2965	12.2950	0.3132	12.6083		47,917.8005	47,917.8005	2.1953		47,972.6839

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
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

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-NW	H-W or C-W	H-S 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	69.00	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

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
Category	lb/day										lb/day					
NaturalGas Mitigated	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.983 2	8,355.983 2	0.1602	0.1532	8,405.638 7
NaturalGas Unmitigated	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.983 2	8,355.983 2	0.1602	0.1532	8,405.638 7

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

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

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
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		131.6662	131.6662	2.5200e-003	2.4100e-003	132.4486
Apartments Mid Rise	35784.3	0.3859	3.2978	1.4033	0.0211		0.2666	0.2666		0.2666	0.2666		4,209.9164	4,209.9164	0.0807	0.0772	4,234.9339
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		150.9911	150.9911	2.8900e-003	2.7700e-003	151.8884
High Turnover (Sit Down Restaurant)	22759.9	0.2455	2.2314	1.8743	0.0134		0.1696	0.1696		0.1696	0.1696		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		561.1436	561.1436	0.0108	0.0103	564.4782
Quality Restaurant	5057.75	0.0545	0.4959	0.4165	2.9800e-003		0.0377	0.0377		0.0377	0.0377		595.0298	595.0298	0.0114	0.0109	598.5658
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		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		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387

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

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

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
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		131.6662	131.6662	2.5200e-003	2.4100e-003	132.4486
Apartments Mid Rise	35.7843	0.3859	3.2978	1.4033	0.0211		0.2666	0.2666		0.2666	0.2666		4,209.9164	4,209.9164	0.0807	0.0772	4,234.9339
General Office Building	1.28342	0.0138	0.1258	0.1057	7.5000e-004		9.5600e-003	9.5600e-003		9.5600e-003	9.5600e-003		150.9911	150.9911	2.8900e-003	2.7700e-003	151.8884
High Turnover (Sit Down Restaurant)	22.7599	0.2455	2.2314	1.8743	0.0134		0.1696	0.1696		0.1696	0.1696		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		561.1436	561.1436	0.0108	0.0103	564.4782
Quality Restaurant	5.05775	0.0545	0.4959	0.4165	2.9800e-003		0.0377	0.0377		0.0377	0.0377		595.0298	595.0298	0.0114	0.0109	598.5658
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		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		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387

6.0 Area Detail**6.1 Mitigation Measures Area**

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
Category	lb/day										lb/day					
Mitigated	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192
Unmitigated	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
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	0.0000	18,000.0000	18,000.0000	0.3450	0.3300	18,106.9650
Landscaping	2.4766	0.9496	82.4430	4.3600e-003		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	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192

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

6.2 Area by SubCategory**Mitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
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	0.0000	18,000.0000	18,000.0000	0.3450	0.3300	18,106.9650
Landscaping	2.4766	0.9496	82.4430	4.3600e-003		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	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192

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

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

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

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%

EXHIBIT B



Paul Rosenfeld, Ph.D.

Principal Environmental Chemist

Chemical Fate and Transport & Air Dispersion Modeling

Risk Assessment & Remediation Specialist

Education

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

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

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

Professional Experience

Dr. Rosenfeld has over 25 years' experience conducting environmental investigations and risk assessments for evaluating impacts to human health, property, and ecological receptors. His expertise focuses on the fate and transport of environmental contaminants, human health risk, exposure assessment, and ecological restoration. Dr. Rosenfeld has evaluated and modeled emissions from 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.

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:

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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 Florala, Alabama. *The AEHS Annual Meeting*. Lecture conducted from San Diego, CA.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Teaching Experience:

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

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

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

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

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

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

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

Academic Grants Awarded:

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

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

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

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

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

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

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

Deposition and/or Trial Testimony:

In the 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

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 NO. 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

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

EXHIBIT C



Technical Consultation, Data Analysis and
Litigation Support for the Environment

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);

- 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.

- 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.

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.

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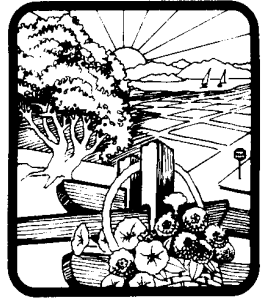
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Other Experience:

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

SCOPE
Santa Clarita Organization for Planning and the Environment
TO PROMOTE, PROTECT AND PRESERVE THE ENVIRONMENT, ECOLOGY
AND QUALITY OF LIFE IN THE SANTA CLARITA VALLEY
POST OFFICE BOX 1182, SANTA CLARITA, CA 91386
www.scope.org



Friends of the Santa Clara River
PO Box 7713 Ventura, California 90006 (805) 320-2265
fscr.org

2-15-25

Attn: Jodie Sackett
Los Angeles Dept of Regional Planning
320 W. Temple St.
Los Angeles, CA 90012

Sent via email to: subdivisions@planning.lacounty.gov

Re: DEIR Comments, Entrada South and Valencia Commerce Center

SCOPE, Friends of the Santa Clara River and their respective members have commented extensively on Fivepoint's westside projects, including the Newhall Ranch Specific Plan, the Resource Management Plan and the previous draft Entrada South EIR released in 2015. These current comments are timely filed via email on Feb. 18th, 2025.

Inadequate Public Notice

In addition to the concerns we expressed in our NOP comments regarding circulation of that document, we now provide additional concerns regarding distribution of the DEIR, we appreciate the wide distribution of USB drives for down loads at multiple libraries. However, releasing a major project right before the holiday season (Dec. 20th) when most of the public will be focusing on family and religious holidays, begs the question of whether or not the County really wants to hear the public comment required by CEQA.

The outcome of this proposal is very important to the community because of its many impacts on the Santa Clara River, schools, the increased wildfire danger, traffic and Green House Gases and water capacity, not to mention the loss of native oaks, all make it a serious concern to residents in the SCV. Yet when SCOPE went to the Stevenson Ranch Library, and other indicated libraries thinking there would be a hard copy of the EIR to read and discuss with interested members of the community, all that was available was a usb thumb drive. This is not what was advertised in your notice of availability and is not sufficient public availability of the document for the following reasons:

- Newer computers no longer have slots for usb ports, so the usb flash drive is useless
- Downloads are extremely slow, especially if they contain large maps.

- Maps are difficult to read on small computer screens and difficult to review at a working group meeting.

We therefore ask that you provide a hard copy of the DEIR to at least one library on the notification list and indicate which library will have the full hard copy and that you extend the comment period for another 30 days after its arrival there, so that the interested public has a document available for review and the time to review it. Further, a SCOPE member tried to access the document at the Newhall Library, but was told that they don't have anything for Entrada and they seemed not to know how to direct the public to the document. After calling and going in person to the library, a message was left for Jennifer Barnekow. A staff member talked to "her administrator", Caroline Hazelton. Caroline said "try City Hall". The County is undoubtedly also aware that the Castaic Library has been closed for many days during the review period due to the Hughes fire and also due to repairs.

We believe these access issues have diminished the public's ability to obtain and review these documents. We therefore request that the comment period be extended or that any late comments be accepted.

EIR Process Issues

According to the County's website regarding this project¹:

The Newhall Ranch Specific Plan consists of comprehensive plans, development regulations, design guidelines, and implementation program consistent with the Los Angeles County General Plan and Santa Clarita Valley Area Plan. Newhall Ranch Specific Plan considers the changes in society and the economy that may occur over the 25-year buildout of the community. The Specific Plan also establishes the protection of open areas next to the community and two large special resource management areas totaling approximately 6,170 acres. The Newhall Ranch Specific Plan was adopted on May 27, 2003.

Neither the Valencia Commerce Center Plan nor Entrada South were or are a part of the Newhall Ranch Specific Plan, nor were zone changes or reviews processed through this Specific Plan. Further, the Specific Plan and its approval did not anticipate that it would be the final review document for ANY tract, instead spelling out that further tracts would require further review as they were brought for individual approvals.

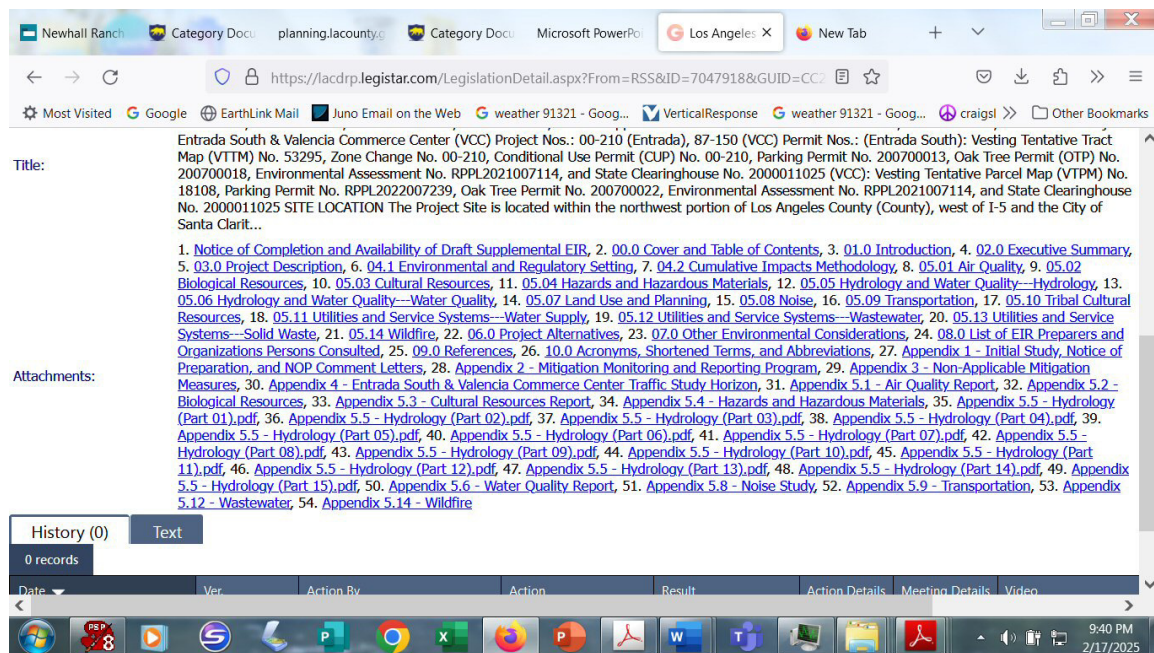
The EIR refers to the OVOV Area Santa Clarita Area Plan update throughout the document, but Entrada was not considered in that document. While the Newhall Ranch specific Plan was listed among the specific plans, as previously stated, this Entrada project was not part of the Newhall Ranch Specific Plan and is not included in the OVOV plan.

The Entrada South area was included as part of the River Management Plan for Newhall Ranch, a joint State and Federal document focused on river management. Due to the size of the area affected, all impacts were required to be reviewed in order to comply with Clean Water Act requirements. While we agree that this vast overview analysis serves well to address cumulative impacts for the massive amount of development proposed, it does not serve at all as an adequate disclosure of project level impacts or as a means of determining County mitigation requirements.

¹ <https://planning.lacounty.gov/long-range-planning/newhall-ranch-specific-plan/>

Tiering on the Resource Management Plan

As we stated in our NOP comments, we believe that reliance on the 15-year-old Resource Management Plan for information on climate change/GHG emissions, aesthetics, traffic and any other omitted area is inappropriate. The Resource Management Plan was an overview document produced for a federal and state river alteration approval, and should not be substituted for the detailed project level study that provides public disclosure and ensures the development of mitigation measures that will be enforced by the County. According to CEQA, **mitigation measures must be “fully enforceable through permit conditions, agreements, or other measures” so “that feasible mitigation measures will actually be implemented as a condition of development.”** (*Federation of Hillside & Canyon Ass'ns v. City of Los Angeles* (2000) 83 Cal.App.4th 1252, 1261 ((quoting Pub. Res. Code § 21081.6(b)).) We note that while the title page of the document claims to include a development agreement, that document was not included in the DEIR materials on the County website (see screen shot below)



The FEIR/EIS for the River Management Plan on which these project-tiering requests are made, was completed in 2010, 15 years ago, and those documents relied on data that was even older than that. An additional focused state/federal document was prepared and circulated and approved in 2017 to address the direction of CA Supreme Court which set the EIR/EIS aside for its failure to follow CA law and to address and mitigate for the GH Gas emissions and climate heating. Since that time many changes have occurred that were not previously predicted. These included year after year of record-breaking temperature² increases, reduced rainfall for groundwater recharge-water supply and massive wildfires caused by drought and dried vegetation. While we appreciate the additional detailed

² Climate Change: Global Temperature

By Rebecca Lindsey AND LuAnn Dahlman Reviewed By Jessica Blunden Published January 18, 2024
Earth's temperature has risen by an average of 0.11° Fahrenheit (0.06° Celsius) per decade since 1850, or about 2° F in total. The rate of warming since 1982 is more than three times as fast: 0.36° F (0.20° C) per decade. 2023 was the warmest year since global records began in 1850 by a wide margin. It was 2.12 °F (1.18 °C) above the 20th-century average of 57.0°F (13.9°C). It was 2.43 °F (1.35 °C) above the pre-industrial average (1850-1900). The 10 warmest years in the historical record have all occurred in the past decade (2014-2023).

information provided in this EIR, we still assert that the County must be able to enforce all mitigation measures in all CEQA review areas, and provide additional mitigation to address these new facts. Accurate up to date data must be provided which cannot be accomplished by tiering on an old document.

We note that the previously released draft EIR for Entrada South (2015)³ did not attempt to tier on the Resource Management Plan even though it was an approved document at the time. Further, the developer did not attempt to and the County and the City did not allow tiering for its San Francisquito Creek projects on a similar overview plan, the Natural River Management Plan, as part of the review for those projects. It is now just as inappropriate to allow an outdated overview document to be used for the detailed project specific analysis and mitigation required for the current proposal.

Combining of two separate non-contiguous projects in one EIR

It is well established that the purpose of an EIR is to provide public agency decision-makers and members of the public with an informational document that explains potentially significant environmental impacts and feasible mitigation measures. (Pub. Res. Code §§ 21002.1, 21061; CEQA Guidelines §§ 15121, 15151; *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 426-27; *Carmel Valley View, Ltd. v. Board of Supervisors* (1976) 58 Cal.App.3d 817, 821-822.) An EIR must include the full range of potentially significant impacts, as well as reasonably prudent avoidance, minimization, and mitigation measures in the EIR to comply with CEQA's information disclosure requirements. (Pub. Res. Code § 21000 et seq.) CEQA requires the planning agency to "mitigate or avoid the significant effects on the environment of projects that it carries out or approves whenever it is feasible to do so." (Pub. Res. Code §§ 21002.1(b); 15126.4.) Mitigation of a project's significant impacts is one of the "most important" functions of CEQA. (*Sierra Club v. Gilroy City Council* (1990) 222 Cal.App.3d 30, 41.) Importantly, mitigation measures must be "fully enforceable through permit conditions, agreements, or other measures" so "that feasible mitigation measures will actually be implemented as a condition of development." (*Federation of Hillside & Canyon Ass'ns v. City of Los Angeles* (2000) 83 Cal.App.4th 1252, 1261 ((quoting Pub. Res. Code § 21081.6(b)).)

Combining two non-contiguous and unrelated projects, then not describing individual characteristics and impacts, but instead comparing them to a large State and Federal River Management Plan approved 15 years ago makes it nearly impossible to understand what the impacts of these individual projects will be.

Take for example, the impact to oak woodlands and oak trees in the Entrada South portion of the EIR. The 2015 project described the impact to oaks as follows:

The proposed Project would remove 29 valley oaks, 35 scrub oaks, one coast live oak, and two valley oak-scrub oak hybrids. Of the 67 oak trees to be removed, three are heritage oak trees. The Project would encroach on up to 11 other oak trees, including two heritage oak trees. The proposed Project would result in permanent direct impacts to 4.4 acres of valley oak/grass on-site. These direct impacts would be significant. (DEIR p.5.4-77). The DEIR states that this is a significant impact.

In contrast, we are unable to find in the current document any clear description of the number of oaks and the genus that will be removed for the current reduced housing

³ The EIR fails to mention this document, but it is available in county files or we can provide it upon request.

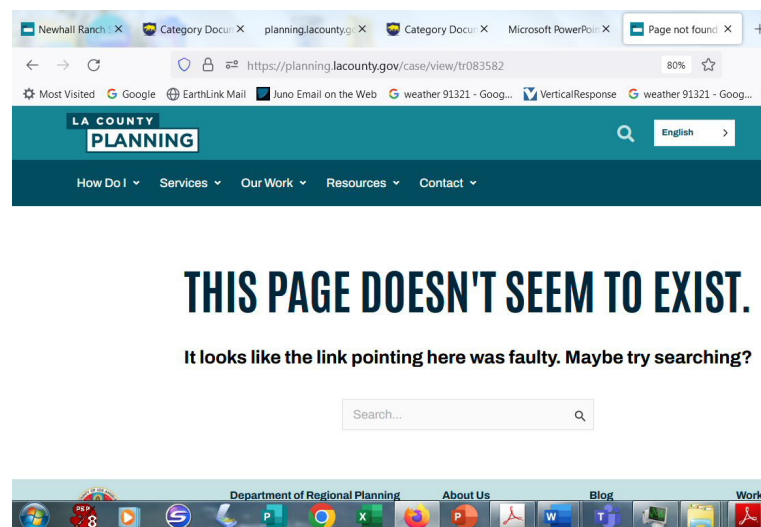
project. This is because the project is merely compared to the River Management Plan which covered the whole Newhall Ranch Specific Plan and additional projects, some 15,000 acres and 30,000 units. The EIR states that the developer must follow the County Oak Ordinance, but disclosing the amount of proposed removals is a requirement of this ordinance. There is not a way to determine if the developer is making an effort to avoid oaks as required by the ordinance and CEQA or even providing suitable habitat for mitigation trees or even if there will be mitigation trees. There is no plain disclosure of impacts but rather an obfuscation that makes it nearly impossible for the public to understand the impacts to the oaks on this project or suggest mitigation.

This same complaint holds true for the impact jurisdictional waters, where the EIR merely states that the impact acreage has increased in the VCC area, but no details are provided in the body of the document. Instead a comparison is made to the impacts in the state document. The original impacts for the VCC area and how this new proposal will add to them are not laid out in detail so that the public is informed and can provide input, and mitigation or avoidance proposals.

This document is uninformative and confusing throughout, as described above and thus does not meet the CEQA informational requirements. As in *San Joaquin Raptor Rescue Center v. County of Merced* (2007) [149 Cal.App.4th 645, 659](#), "[t]he decision makers and general public should not be forced to sift through obscure minutiae or appendices in order to ferret out the fundamental baseline assumptions that are being used for purposes of the environmental analysis."

Improper Notice of Preparation

The NOP for this document issued In October 2021, referenced tract map #083592. However, an entirely different tract map (#053295) is discussed In the EIR document. The NOP noticed map has been removed from the County website, so it is impossible to compare the two maps to understand the differences (see below)



Utilities - Water Supply

While the Initial Study lists Utilities as an area which must be addressed in this document, we note that the DEIR states it did not prepare a new Water Supply Assessment, instead relying on the Urban Water Management Plan. These projects may

not do rely simply on the UWMP for several reasons, primarily because they are requesting a plan amendment. In addition, the water supply agreement between Newhall Land/Five Points and Santa Clarita Water states that additional water for their developments would not be made available from Newhall's Nickel Water Acquisition (currently stored in Kern County) will not be supplied until the last tract map of Newhall Ranch has been approved and all litigation settled. (see attached agreement. section 6.8) This is a complicated legal agreement, but It essentially means that the water supply would be quite short for other projects in the event that water was not timely supplied as needed and as represented that it would be, per the Newhall Ranch Specific Plan. Further, Newhall, now FivePoint agreed that farming acreage would be retired in order to supply Newhall Ranch's first two tracts, Landmark and Mission Village. (see water section of the Specific Plan, 2003). While many homes In Mission Village have been built, occupied and are now receiving water, no farmland seems to have been retired per the requirements of the Newhall Ranch Specific Plan⁴. Because of these anomalies and to ensure adequate water supply for existing and future residents, a Water Supply Assessment must be conducted in accordance with state law (SB610) as noted in our NOP comment. No such analysis was provided in the EIR. This is an EIR deficiency that must be addressed to ensure water availability for existing residents and firefighting needs. Also, there are not water availability letters in the EIR for these projects as required by the County Code.

We are especially adamant that this information be included after reading and commenting on the SCV Sustainable Ground Water Agency's Ground Water Sustainability Plan⁵ which forecasts severe drops in water level due to future development

“But the Groundwater Management Plan, Santa Clara River Valley Groundwater Basin, East Subbasin, Los Angeles County, California (Basin Operating Plan) described in Section 6 contemplates groundwater levels lower than historical levels during dry years, to accommodate future buildout, conjunctive use operating strategies, and climate change (LSCE, 2003). (emphasis added) (p. 8-4)

.....groundwater pumping may temporarily cause groundwater level declines of up to 150 feet in the future. (page 9-15)

As one of the plaintiff's in the litigation over the original 1999 Newhall Ranch Specific Plan, we have not forgotten that a major reason that document was set aside by the Court in 2000 was that it predicted a 10-foot drop in ground water levels, meaning downstream users and environmental needs would be receiving substantially less water. No such water level drop was disclosed or contemplated in the Resource Management Plan. This is obviously changed information and must be addressed in a new EIR.

Also, since the previous Urban Water Management Plan on which this document purports to rely, the Santa Carita Valley Water Agency wells have been impacted with a new pollutant, PFAS, causing the water agency to remove from service around 45% of its

⁴ included by reference and in County files

⁵ Santa Clarita Valley Ground Water Sustainability Plan, included by reference, may be accessed here: <https://share.gsiws.com/index.php/s/CrynwfbbiHFCqQT>

wells⁶ to ensure public health until such time that expensive well head treatment facilities can be funded and built. In a 2004 2nd appellate Decision, the Court found that polluted water cannot be relied upon as a supply.⁷ It is therefore imperative that a Water Supply Assessment be provided for these two projects along with the requisite will-serve letters.

In a 2008 appellate ruling *CA Water Impact Network v. Newhall County Water District*, the Court found that Water Supply Assessments (and in this case, a lack thereof) cannot be litigated separately, but only as a part of a CEQA challenge.⁸

Obligation to Address the Public Trust

Since the Ground Water Sustainability Plan predicts a major drop in ground water levels due in part to future demands from huge projects such as this as well as climate change, we believe the County and the developer are obligated to consider and disclose how such projects will affect the public trust resources, including navigable surface waters and fisheries. Groundwater hydrologically connected to surface waters is also subject to the Public Trust Doctrine to the extent that groundwater extractions or diversions affect or may affect public trust uses (*Environmental Law Foundation v. State Water Resources Control Board* (2018), 26 Cal. App. 5th 844; *National Audubon Society v. Superior Court* (1983), 33 Cal. 3d 419).

Evaluation of water supply impacts should consider potential impacts to and appropriate protections for interconnected surface waters and their tributaries, and interconnected surface waters that support fisheries, including the level of groundwater contribution to those waters. Public Trust Doctrine considerations should carefully evaluate and protect environmental beneficial uses and users of groundwater, including fish and wildlife and their habitats, groundwater dependent ecosystems, and interconnected surface waters.

Inclusion of GHG/Climate Change Analysis

Although requested in our NOP comments this document excludes a GHG analysis, instead relying on the Resource Management Plan. We believe that the impacts to climate change from auto-oriented projects such as Entrada South and the proposed commercial additions have substantially changed since the previous EIR, including increased emissions, occurrences of wildfire and reduced precipitation. While this document updates the traffic study and air quality sections which relate to GHG, it fails to update or even provide a GHG section. Air pollution including GHG such as NOX and other pollutants from new sources such as delivery truck traffic that have become a substantial source of emissions, should be analyzed and mitigated.

⁶ <https://yourscvwater.com/sites/default/files/SCVWA/your-water/pfas/SCV-Water-PFAS-Fact-Sheet-May-2024.pdf> “Under the current response levels set in 2020, 28 of the 45 active agency wells were removed from service. This accounted for approximately 45% of the Agency’s groundwater supply and 31% of the total water used in our service area in 2022. Since 2020, four wells are back in service with treatment systems to remove PFAS. These wells restored approximately 11% of the supply and additional groundwater treatment facilities are scheduled to be back online at the rate of one per year for the next 5-7 years.”

⁷ *Friends of the Santa Clara River v. Castaic Lake Water Agency* 123 Cal.App.4th 1 (Cal. Ct. App. 2004) 9 Cal. Rptr. 3d 625

⁸ 161 Cal.App.4th 1464 (Cal. Ct. App. 2008) 75 Cal. Rptr. 3d 393

This DEIR failed to calculate the impact of the loss of oak trees on greenhouse gas emissions. It is a scientific fact that oaks absorb a significant amount of CO₂ from the atmosphere and re-process it into oxygen. The DEIR should make these calculations and disclose the impacts in the DEIR. Mitigation for this loss should be replacement of the same capacity of trees needed for an equal amount of CO₂ absorption.

Also, as part of the GHG section, the DEIR should include an analysis and inclusion of the mitigation report describing the outcomes for the existing GHG mitigation requirements for the approved Mission tract. This information is necessary so that the public and the decision makers may evaluate whether the proposed mitigation from this previously approved project is in actuality producing reduced climate emissions. Base line assumptions such as the assumption that only 27% of residents will commute out of the Valley for work, and the percentage of EV use, may need to be reevaluated regarding air pollution and GHG emissions to comply with new attainment goals.

A new EIR must be prepared for review and comment whenever significant new information becomes known to the lead agency. Under such circumstances the lead agency is specifically required to re-notice the environmental review document to the public and all responsible agencies, and is required to obtain comments from the same, before certifying the document's impacts, its alternatives analyses, and any mitigation measures. (*See id.*; *see also*, Cal Pub. Res. Code § 21153.) A lead agency's decision not to include a required section of an EIR must be supported by substantial evidence. (CEQA Guidelines § 15088.5(e).)

"Significant new information" includes any information regarding changes in the environmental setting of the project under review. (CEQA Guidelines § 15088.5(a).) It also includes information or data that has been added to the EIR and is considered "significant" because it deviates from that which was presented in the document on which it is being tiered, depriving the public from a meaningful opportunity to comment upon a significant environmental effect of the project, or a feasible way to mitigate or avoid such an effect at the time of circulation of the draft. (*Id.*)

Some examples of when a lead agency may not rely on tiering an EIR:

- (1) When the new information shows a new, substantial environmental impact resulting either from the project or from a mitigation measure;
- (2) When the new information shows a substantial increase in the severity of an environmental impact
- (3) When the new information shows a feasible alternative or mitigation measure that clearly would lessen the environmental impacts of a project and the project proponent declines to adopt the mitigation measure;

Utilities – Waste Service

This section provides inaccurate and out of date information regarding the availability of landfill space at Chiquita Canyon Landfill, which was closed by the operator on January 1st 2025. While this date is after the release of the DEIR, FivePoint was aware and therefore the DEIR Preparer must have been aware of the ongoing heating event, release of leachate



into the air and water⁹ and Regional Water Quality Control Board's denial of the landfill's expansion into Cell B which occurred well before the release of the DEIR.¹⁰ Solid waste has now become an emergency in the Santa Clarita Valley with Antelope Valley and Sunshine Canyon landfills stating they cannot take in more waste. This problem and mitigation to address it must be disclosed in the DEIR.

The heating/burning event at the landfill has now been going on for two years. Nearby residents in Val Verde and Castaic are suffering major health issues from this event which has caused the release of increased odors and irritating pollutants. They have suffered from asthma and an increased rate of cancer. This information should have been disclosed in the DEIR and a study conducted as to whether residents in the Entrada or workers in the VCC area will be exposed to noxious fumes from the landfill.

Oaks

The 2015 DEIR found the impact to oaks and the oak woodlands on the project to be a significant impact, though it is hard to know since as previously stated, it is not clear how many oaks are being removed. The proponent proposed to bring this significant impact to a less than significant level by providing a new, enhanced, and/or restored valley

⁹ <https://calepa.ca.gov/chiquita-canyon-response/>

¹⁰ **Denial of request:** On Sept. 25, 2024, to protect groundwater under the landfill in Castaic, the Los Angeles Regional Water Quality Control Board reaffirmed its June decision denying Chiquita Canyon LLC's request to place waste in Cell 8B. The board determined that information submitted by the landfill operator was inadequate to address impacts from the ongoing development of individual cells within the landfill.

Notice of Violation: On June 27, 2024, the board issued a Notice of Violation to the landfill operator for alleged violations of the investigative order issued on March 20, 2024, including the failure to submit certain technical reports and monitoring and reporting data. The notice directs the landfill to submit the late and missing information to establish compliance.

Notice of Violation: On April 9, 2024, the Los Angeles Regional Water Quality Control Board issued a Notice of Violation to the landfill operator after investigating multiple complaints from citizens. The notice documents violations of the company's industrial stormwater permit, including unauthorized discharges. Videos and pictures from citizen complaints show water being pumped from the south detention basin into a local waterway that flows into the Santa Clara River. Violations for failing to fully complete the Stormwater Pollution Prevention Plan were also cited. The notice directs the landfill operators to cease the unauthorized discharges, undertake corrective measures and, by May 9, 2024, submit a written response identifying those actions.

Notice of Violation: On March 28, 2024, the board issued a Notice of Violation to the landfill operator for failing to comply with its industrial stormwater permit. The notice documents violations observed by staff during Jan. 29 and Feb. 20 inspections, along with those identified through sampling data submitted by the landfill. The notice directs the landfill operator to take immediate action to correct the alleged permit noncompliance, including the installation of additional best management practices.

Investigative Order: On March 20, 2024, the Los Angeles board issued an investigative order requiring the landfill operator to submit technical reports and additional monitoring and reporting. The order also required the landfill operator to install additional groundwater monitoring wells and conduct sampling of all discharges into the sedimentation basin.

oak/grass area(s) that seems to be located off site, although it is unclear whether that is still the plan.

That is the performance criteria established in the Oak Resource Management Plan. It cites examples of successful completion of each woodland creation or enhancement site as 1) it must not involve any irrigation, planting, or re-seeding for a minimum of three years; 2) oak trees must be within 5 percent of the plan target density for surviving, healthy oak trees; 3) and non-native grass cover must not exceed the target amount of woodland non-native grass cover. While this may be sufficient mitigation for a significant impact, one cannot know that because no such plan has been completed, nor have any specific sites been identified. This precludes the public from reviewing and commenting on the adequacy of such a plan. I therefore urge the County not to approve this project without a completed Oak Resource Plan included in the DEIR that the public has had the opportunity to review. I remind the County of recent proposed projects that would have severely impacted another Valley Oak resource area, SEA 64, had not strong requirements, including dedicated open space, been put in place at the time of the project approval.

Also, the previous 2015 DEIR stated that the plan shall be subject to the requirements of County of Los Angeles Oak Tree Ordinance (“CLAOTO”) and shall address impacts to oak resources, including oak trees of the sizes regulated under CLAOTO. Because loss of oaks on this project was determined to be significant by the DEIR, merely following the replacement requirements of the ordinance would not sufficient mitigation. The oak ordinance also requires that the applicant provide the burden of proof as to why he must cut the oaks. That burden of proof was not disclosed and has not been met here, as an alternative providing avoidance was not included in the DEIR.

In fact, California state law requires additional mitigation for loss of the oak woodlands in this project. Section 21083.4. of the CA Resources Code states that:

- “ (b) As part of the determination made pursuant to Section 21080.1, a county shall determine whether a project within its jurisdiction may result in a conversion of oak woodlands that will have a significant effect on the environment. If a county determines that there may be a significant effect to oak woodlands, the county shall require one or more of the following oak woodlands mitigation alternatives to mitigate the significant effect of the conversion of oak woodlands:
- (1) Conserve oak woodlands, through the use of conservation easements.
 - (2) (A) Plant an appropriate number of trees, including maintaining plantings and replacing dead or diseased trees.
 - (B) The requirement to maintain trees pursuant to this paragraph terminates seven years after the trees are planted...etc.”

Since the 2015 DEIR determined that this project would have a significant impact to oak woodlands, this similar project must also have a significant impact. A deferred oak resource plan, if that is what is proposed, is not adequate mitigation to meet state law.

Biological Resources

Since the release of the NOP in 2021, the Southern California mountain lion and the Southwestern Pond Turtle are both now being considered for listing under the CA Endangered Species Act due to the increasing loss of the numbers and diminishing habitat. This constitutes a change since the River Management Plan was released. On page 5.2-41 of the Biological Resources section, the DEIR blatantly mis-represents this fact, stating that there has been no change in status. As a candidate for listing, mountain lions living in the proposed Evolutionarily Significant Unit (ESU) of which this project is a part, are now a candidate species, as is the pond turtle and are temporarily afforded the same protections as a state-listed endangered or threatened species. Mitigation for impacts to these species in the River Management Plan is not sufficient to address this new status and the current EIR fails to discuss it.

Comments Specific to VVC Planning Area

The grading of the existing hill violates the Castaic CSD since the hill is listed as a red line ridge. We ask that the proposed grade is lowered by 1/2 and that the cut south face be graded to look natural allowing the area to become a hiking park area. The required oaks removed from this site should be moved if possible and replaced by the required oak replacement on the existing remaining hill. A further reason to minimize the hill grading is that there are 2 schools and 2 daycare facilities that would be impacted negatively by diesel fumes and dust adding to the already major impacts caused by the landfill fumes and gasses. The addition of a hiking / walking park would be advantages to the existing residents and the commerce center and create a positive life experience.

Conclusion

We believe that the Resource Plan, is not sufficient to address project level impacts for the above stated reasons, i.e. it is based on outdated or inapplicable studies and data. Significant new information will substantially change the DEIR's analyses of the Project's impacts, alternatives and required mitigation, so these areas must be covered in this new document. (*Laurel Heights Improvement Assn. v. Regents of Univ. of Cal.* (1993) 6 Cal.4th 1112, 1132 (*Laurel Heights*).)

We believe the DEIR should have included updated studies on CO2 emissions and other GHG gases and water supply that include an evaluation of a significant ground water level drop, and other safety hazards (such as a study regarding the safety of building on or near existing oil wells with a disclosure of County requirements and how they will be monitored and enforced) should have been included in this new document in order for it to be informative and impacts properly mitigated.

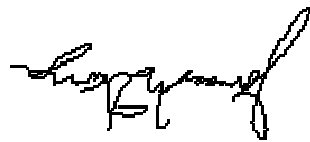
We do not concur that the Climate/GHG chapter may be excluded.

Thank you in advance for your consideration of these concerns and thank you for your time.

Sincerely,



President



James M. Danza, MS, AICP
Chair, Friends of the Santa Clara River

Attachment:
CLWA Water Agreement with Newhall Land and Farming

**EMINENT DOMAIN SETTLEMENT AGREEMENT AMONG
CASTAIC LAKE WATER AGENCY, THE NEWHALL LAND AND FARMING
COMPANY, AND VALENCIA WATER COMPANY**

This SETTLEMENT AGREEMENT (the “**Agreement**”) is made as of December 12, 2012, by and among THE NEWHALL LAND AND FARMING COMPANY, a California limited partnership (“**Newhall**”), CASTAIC LAKE WATER AGENCY, a public agency duly organized and existing under and by virtue of the laws of the State of California (“**Agency**”), and VALENCIA WATER COMPANY, a California corporation (the “**Company**”). Newhall, Agency, and Company are sometimes collectively referred to herein as the “**Parties**.”

RECITALS

A. The Company’s authorized common stock consists of fifty thousand (50,000) shares of common stock, One Hundred Dollar (\$100) par value, of which fifteen thousand three hundred sixty-five (15,365) shares are issued, outstanding, and owned by Newhall (the “**Shares**”).

B. The Company is a California corporation and an investor-owned public utility regulated by the California Public Utilities Commission (“**PUC**”), which sells water to residential, industrial, and commercial customers (the “**Business**”).

C. Agency has filed a condemnation action against Newhall, as the Company’s sole shareholder (*Castaic Lake Water Agency v. The Newhall Land and Farming Company*, Los Angeles County Superior Court Case No. BC497322), a copy of which is attached hereto as Exhibit A (the “**Condemnation Action**”).

D. To resolve the Condemnation Action, Agency, Newhall, and Company have entered into a settlement, which is memorialized through this Agreement and the stipulation for judgment in the Condemnation Action. A copy of the form of judgment is attached hereto as Exhibit B (the “**Stipulated Judgment**”).

E. Through this Agreement, Agency agrees to purchase, and Newhall agrees to sell and transfer to Agency, all of the Shares pursuant to the stock purchase provisions set forth herein. Further, as additional consideration for the settlement, the Parties have agreed to the terms and conditions upon which (i) Newhall will transfer to Agency certain water supply related rights now owned by Newhall and (ii) Agency and Company will carry out certain water service obligations related to properties owned by Newhall and affiliates of Newhall, including Stevenson Ranch Venture, LLC, a Delaware Limited Liability Company (“**SRV**”) within or immediately adjacent to Agency’s service area.

NOW THEREFORE, in settlement of the Condemnation Action, and in consideration of the mutual covenants, terms, and conditions set forth in this Agreement, and other good and valuable consideration, the receipt and sufficiency of which are hereby acknowledged, the Parties agree as follows:

AGREEMENT

ARTICLE I **SHARE PURCHASE**

1.1 Purchase and Sale of Shares. Upon the terms and subject to the conditions set forth in this Agreement, and pursuant to the Stipulated Judgment, Agency hereby agrees to purchase from Newhall and Newhall agrees to sell, transfer, assign, convey, and deliver the Shares to Agency, on the Closing Date (as defined below), free and clear of any and all liens, encumbrances, security interests, pledges, options, charges, and restrictions (collectively, “**Liens**”).

1.2 Closing. The delivery of the Shares and the payment therefore (the “**Closing**”) shall take place at the Newhall office, 25124 Springfield Ct, Suite 300, Valencia, CA 91355, on a date and at a time after entry of the Stipulated Judgment in the Condemnation Action agreed to by Agency and Newhall, which date and time shall be no later than three (3) business days after the date said judgment is entered unless a later time is agreed to in writing by all parties. The date on which the Closing occurs is hereinafter referred to as the “**Closing Date**.”

ARTICLE II **PURCHASE PRICE AND DELIVERY OF SHARES**

2.1 Purchase Price. Subject to any adjustments set forth in this Agreement, Agency shall pay to Newhall for the Shares a purchase price in the total amount of Seventy Three Million Eight Hundred Thousand Dollars (\$73,800,000) (“**Purchase Price**”).

2.2 Payment of Purchase Price and Delivery of Shares.

2.2.1 Closing Date Payment. The Purchase Price shall be paid in full to Newhall at the Closing by depositing the Purchase Price by a confirmed wire transfer of readily available federal funds pursuant to instruction provided by Newhall prior to the Closing Date.

2.2.2 Adjustments to the Purchase Price. Attached hereto as Exhibit C is an unaudited pro forma balance sheet (“**Proforma Balance Sheet**”) dated as of November 30, 2012 (the “**Balance Sheet Date**”) prepared internally by the Company consistent with generally accepted accounting principles, which is an updated version of the Balance Sheet dated December 31, 2011, audited by Deloitte in conjunction with the audit for the year ended December 31, 2011. A copy of the Company’s December 31, 2011, audit report which was previously delivered by Newhall to Agency includes the December 31, 2011, audited balance sheet (the “**Prior Balance Sheet**”). The following adjustments shall be made to the Purchase Price based upon the amounts included in the Proforma Balance Sheet as of the Balance Sheet Date:

(a) On the Closing Date, the Purchase Price will be increased by Certain Assets of the Company determined as of the Balance Sheet Date. The term “**Certain Assets**” means the sum of the following assets of the Company only (and shall not include any other known or unknown assets of the Company): (i) all cash and cash equivalents (reduced by

the cash necessary to make the Preferred Share Payment pursuant to Section 2.3), and (ii) the Accounts Receivable categorized on the Proforma Balance Sheet as "Metered Trade Accounts Receivable" and "Unbilled Receivables."

(b) On the Closing Date, the Purchase Price will be decreased by Certain Liabilities of the Company determined as of the Balance Sheet Date. The term "**Certain Liabilities**" means the sum of the following liabilities of the Company only (and shall not include any other known or unknown liabilities of the Company): (i) the Accounts Payable categorized on the Proforma Balance Sheet as "Trade Accounts Payable" and "Accrued Trade Payables," and (ii) the outstanding balance of the Notes Payable issued by the Company pursuant to that certain Note Purchase Agreement dated as of June 1, 2010, (the "**Note Purchase Agreement**") in the outstanding principal balance of Twenty-Four Million Dollars (\$24,000,000), together with any and all accrued, unpaid interest thereon calculated in accordance with the Note Purchase Agreement (which shall be a continuing obligation of the Company following the Closing Date).

(c) Within ninety (90) days following the Closing Date, representatives of Newhall and the Agency shall meet at the principal office of Newhall to determine whether it is necessary to make an adjustment to the Purchase Price (the "**Purchase Price Adjustment**") solely to reflect the actual differences between (i) the Certain Assets and Certain Liabilities of the Company used to determine the Purchase Price as of the Balance Sheet Date, and (ii) the Certain Assets and Certain Liabilities of the Company determined as of the Closing Date. If the Purchase Price Adjustment exceeds One Hundred Thousand Dollars (\$100,000.00) (the "**Adjustment Threshold**"), then the amount of such Purchase Price Adjustment in excess of the Adjustment Threshold (the "**Additional Payment**") shall be required to be paid by one Party to the other Party (in the manner described below) within ten (10) business days after the date the Purchase Price Adjustment is determined. If an Additional Payment is required to be made and the Purchase Price Adjustment is negative, then Newhall shall be obligated to pay the Additional Payment to the Agency. If an Additional Payment is required to be made and the Purchase Price Adjustment is positive, then the Agency shall be obligated to pay the Additional Payment to Newhall. If the Purchase Price Adjustment is less than or equal to the Adjustment Threshold, then no Purchase Price Adjustment shall be made and neither Party shall be obligated to make any payment to the other Party pursuant to this Section 2.2.2(c). For avoidance of doubt, the Parties agree that the Additional Payment is only required to be made if the Purchase Price Adjustment exceeds the Adjustment Threshold and the amount of the Additional Payment is limited solely to the amount of such excess (and does not include the \$100,000.00 Adjustment Threshold amount).

2.2.3 No Other Adjustments to the Purchase Price. Except to the extent set forth in Sections 2.2.2 and 5.6.1, there will be no other adjustments to the Purchase Price. Without limiting the generality of the preceding sentence, there will be no adjustments for (i) any changes in the following items categorized on the Proforma Balance Sheet as "Other Receivables," "Inventories," "Prepaid Expenses," "Property and Equipment," "Other Assets," "other Accounts Payable," "Accrued Liabilities," "Income Taxes Receivable/Payable," "Deferred Tax Assets," "Deferred Tax Liabilities," "Advances for Construction," "Other Deferred Credits," or "Contributions in Aid of Construction," (ii) any other items included in the Proforma Balance Sheet other than the Certain Assets and the Certain Liabilities, (iii) any of the services or other

responsibilities of Newhall and the Company in Sections 6.2.3 and 6.2.4, (iv) any continuing obligations to provide reimbursements under the existing main line extension agreements and to provide other advances for construction described in the agreements listed on Schedule 2.2.3 attached hereto, (v) any differences in any amounts that are ultimately actually collected for the accounts receivable items described in Section 2.2.2(a)(ii) (or for any other Company accounts receivable) and/or actually paid for the payables described in Sections 2.2.2(b)(i) and 2.2.2(b)(ii) (or for any other Company payables), or (vi) any known or unknown liabilities not reflected in the Balance Sheet, regardless of whether any such known or unknown liabilities would otherwise be categorized under Section 2.2.2.(b)(i).

2.3 Delivery of Shares. Newhall, at the Closing, upon confirmation that (i) the Purchase Price, as adjusted, has been deposited as required by section 2.2.1 hereof, and (ii) the final order of condemnation in the Condemnation Action has been filed, shall deliver to the Agency an Assignment Separate From Certificate attached to the original stock certificate(s) for the Shares duly executed by Newhall in favor of the Agency.

2.4 Preferred Shares. The Company is authorized to issue fifty thousand (50,000) shares of nine and 5/10ths percent (9.5%) preferred stock of which two thousand four hundred (2,400) shares have been issued to Newhall and are outstanding (collectively, the “**Preferred Shares**”). The Preferred Shares were issued with a Five Hundred Dollars (\$500) par value for a total of One Million Two Hundred Thousand Dollars (\$1,200,000). Cumulative dividends for the Preferred Shares have been paid through September 30, 2012. On or before the Closing Date, Newhall shall tender and the Company shall fully redeem for One Million Two Hundred Thousand Dollars (\$1,200,000) cash all of the issued and outstanding Preferred Shares, plus the cumulative unpaid dividends calculated at the rate of Three Hundred Twelve and 33/100ths Dollars (\$312.33) per day for the period commencing on October 1, 2012 and continuing through the date the Preferred Shares are redeemed by the Company. The foregoing payment is referred to as the “Preferred Share Payment.”

2.5 Settlement Amount. The Parties acknowledge that the Purchase Price agreed to by Newhall was in settlement of the Condemnation Action and does not evidence Newhall’s agreement as to the value of the Company or the Shares in any other contested, adversarial, or other proceeding, whether in eminent domain or otherwise.

ARTICLE III

REPRESENTATIONS AND WARRANTIES OF NEWHALL

3.1 Representations and Warranties. Newhall represents and warrants to the Agency, as of the date hereof and as of the Closing Date, as follows:

3.1.1 Authorization. Newhall, as the Company’s sole shareholder of record, has the full legal right and capacity to own, sell, and transfer the Shares.

3.1.2 Powers. Newhall, as the Company’s sole shareholder of record, has the full legal right, power and authority: (i) to enter into this Agreement; (ii) to carry out its obligations hereunder; and (iii) to carry out and consummate all other transactions contemplated by this Agreement. Newhall has all requisite power and authority to carry on its activities as

now conducted and has met all statutory and other prerequisites for selling the Shares in settlement of the Condemnation Action and taking the other actions described in this Agreement.

3.1.3 Authorization; Necessary Actions; Binding Effect. Newhall, through its authorized representatives, has authorized Newhall to execute and deliver and to perform its obligations under this Agreement and any other documents and agreements required to be executed, delivered, and performed hereunder and to consummate the transactions contemplated hereby and thereby. This Agreement constitutes valid obligations of Newhall and is legally binding on and enforceable against Newhall in accordance with its terms except as such enforceability may be limited by bankruptcy, insolvency, moratorium, or other similar laws affecting creditors' rights.

3.1.4 Capitalization. The Company's authorized common stock consists solely of fifty thousand (50,000) shares of common stock of one-hundred dollar (\$100) par value, of which fifteen thousand three hundred sixty-five (15,365) shares are issued and outstanding. No shares of stock of the Company are reserved for issuance upon exercise of any warrants, options, or other rights to purchase, or upon conversion of any securities convertible into shares of common stock. Except for the Preferred Shares, no shares of any other class of capital stock, and no instrument that is convertible or exercisable into or exchangeable for any share of capital stock of any class, has been authorized or issued by the Company. All of the Shares have been duly authorized and are validly issued, fully paid, and non-assessable. No Shares have been issued in violation of contravention of any applicable federal or state securities laws or regulations and no Shares have been issued in violation of any preemptive rights of any shareholder or other agreement to which the Company or any shareholder of the Company are or were a party. Except for the Preferred Shares, there is no preemptive or other outstanding rights, options, warrants, conversion rights, stock appreciation rights, redemption rights, agreements, arrangements, or commitments to issue or sell any Shares or other securities of the Company or any securities or obligation convertible or exchangeable into or exercisable for, or giving any person a right to subscribe for or acquire any securities of the Company, and no securities or obligation evidencing such rights are authorized, issued, or outstanding.

3.1.5 Stock Ownership. Newhall is the owner, beneficially and of record, of all of the Shares, issued free and clear of all Liens, other than restrictions imposed by federal or applicable state securities laws which do not constitute an impediment to the transfer described in this Agreement. All of the Shares are located at the Newhall headquarters, 25124 Springfield Court, Suite 300, Valencia CA 91355, which is located within the boundaries of the Agency and within the service area of the Company. A legal description of the Newhall headquarters is attached to this Agreement as Exhibit D. Upon delivery of the certificates representing the Shares at the Closing and recording of the final order of condemnation in the Condemnation Action, Newhall shall transfer to Agency and Agency shall acquire from Newhall, good and valid title to the Shares, free and clear of all Liens. The Shares constitute, and on consummation of the sale and transfer of the Shares to Agency shall constitute, one hundred percent (100%) of the issued and outstanding shares of common stock of the Company.

3.1.6 No Conflicts or Violations. The execution, delivery, and performance of this Agreement by Newhall or the Company, as applicable, will not result in any of the

following, the occurrence of which would have a material adverse effect on the ability of Newhall or the Company to perform their obligations under this Agreement:

(a) A violation of, or conflict with, the Articles of Incorporation, Bylaws or other governing documents of Newhall or the Company;

(b) A default, breach, or violation, or an event that, with notice or lapse of time, or both, would be a default, breach, or violation, or result in the termination of or accelerate the performance required by the Company of any material lease, license, franchise, promissory note, conditional sales contract, indenture, mortgage, deed of trust, security or pledge agreement, shareholders or subscription agreement, instrument or other agreement, written or oral to which the Company is a party or is subject to or by which its assets are bound;

(c) The termination of any material contract or the acceleration of the maturity of any indebtedness or other material obligation of the Company;

(d) The creation or imposition of any Lien on any assets of the Company; or

(e) A violation or breach of any writ, injunction, or decree of any court or governmental instrumentality to which Newhall or the Company is a party or by which their assets are bound or any laws or regulations applicable to Newhall, the Company, or their businesses.

3.1.7 Financial Statements. The Prior Balance Sheet, Statement of Income, Statement of Changes in Stockholder's Equity and Statement of Cash Flows (collectively, the "**Financial Statements**") have been audited by Deloitte, whose opinion thereon is included in the Financial Statements. The Proforma Balance Sheet is unaudited and, to the Actual Knowledge of Newhall, has been prepared and is consistent with generally accepted accounting principles used in the preparation of audited financials for the Company. The Financial Statements and, to the Actual Knowledge of Newhall, the Proforma Balance Sheet, fairly present the assets, liabilities and financial position of the Company as of the date thereof in all material respects.

3.1.8 Liabilities. To Newhall's Actual Knowledge, the Company has no material liabilities, obligations or commitments, except for (i) liabilities reflected or provided for in the Financial Statements and the Proforma Balance Sheet, (ii) liabilities incurred in the ordinary course of business and consistent with the Company's past practice, and (iii) the liabilities disclosed on Schedule 3.1.8.

3.1.9 Employees. Schedule 3.1.9 containing a current list of Company employees and salaries has been provided to the Agency under separate cover. The Company made available for review by Agency, on a confidential basis, all salary, benefit, and accrued vacation information for such employees. All the information provided is complete and accurate in all material respects.

3.1.10 Collective Bargaining. The Company is not a party to or bound by any collective bargaining agreement.

3.1.11 Employee Benefits. Schedule 3.1.11 lists each “employee benefit plan” as defined in the Employee Retirement Income Security Act of 1974, as amended (“ERISA”), that the Company maintains or participates in with Newhall or which the Company contributes or to which the Company has any obligation to contribute toward (collectively, the “Plans”).

(a) Each Plan (and each related trust, insurance contract, or fund) has been maintained, funded and administered in all material respects with the terms of such Plan and the terms of any applicable collective bargaining agreement and complies in form and in operation in all material respects with the applicable requirements of ERISA, the Internal Revenue Code of 1986, as amended (the “Code”), and other applicable laws.

(b) To Newhall's Actual Knowledge, all required reports and descriptions (including Form 5500 annual reports, summary annual reports, and summary plan descriptions) have been timely filed and/or distributed in accordance with the applicable requirements of ERISA and the Code with respect to each Plan. To Newhall's Actual Knowledge, the requirements of Part 6 of Subtitle B of Title I of ERISA and Code §4980B (“COBRA”) have been met with respect to each Plan and each employee benefit plan maintained by any entity that is treated as a single employer with the Company for purposes of Code §414 that is an “employee welfare benefit plan” as defined in ERISA §3(1) subject to COBRA.

(c) To Newhall's Actual Knowledge, all contributions (including all employer contributions and employee salary reduction contributions) that are due have been made within the time periods prescribed by ERISA and the Code to each Plan that is an “employee pension benefit plan” as defined in ERISA §3(2) and all contributions for any period ending on or before the Closing Date that are not yet due have been made to each Plan or accrued in accordance with the past custom and practice of the Company. To Newhall's Actual Knowledge, all premiums or other payments for all periods ending on or before the Closing Date have been paid with respect to each Plan that is an employee welfare benefit plan.

(d) Each Plan that is intended to meet the requirements of a “qualified plan” under Code §401(a) has received a determination from the Internal Revenue Service that such Plan is so qualified, and nothing has occurred since the date of such determination that could adversely affect the qualified status of any such Plan.

(e) To Newhall's Actual Knowledge, there have been no “prohibited transactions” as defined in ERISA §406 and Code §4975 with respect to any Plan or any employee benefit plan maintained by an entity that is treated as a single employer with the Company for purposes of Code §414. To Newhall's Actual Knowledge, no “fiduciary” as defined in ERISA §3(21) has any liability for breach of fiduciary duty or any other failure to act or comply in connection with the administration or investment of the assets of any such Plan. To Newhall's Actual Knowledge, no action, suit, proceeding, hearing, or investigation with respect to the administration or the investment of the assets of any such Plan (other than routine claims for benefits) is pending or threatened in writing.

(f) Except as otherwise disclosed on Schedule 3.1.11(f), to Newhall's Actual Knowledge, no such Plan that is an employee pension benefit plan has been completely or partially terminated or been the subject of a “reportable event” as defined in ERISA §4043. To

Newhall's Actual Knowledge, no proceeding by the Pension Benefit Guaranty Corporation to terminate any such Plan has been instituted or threatened in writing. To Newhall's Actual Knowledge, all required employer matching contributions to such Plan have been made and are up to date. To Newhall's Actual Knowledge, no Plan is considered to be in "at-risk" status under Code §430.

(g) The Company has not incurred, and to Newhall's Actual Knowledge, there is no reason to reasonably expect that the Company will incur, any liability to the Pension Benefit Guaranty Corporation (other than with respect to Pension Benefit Guaranty Corporation premium payments not yet due) or otherwise under Title IV of ERISA or under the Code with respect to any such Plan that is an employee pension benefit plan.

(h) Neither the Company nor any entity that is treated as a single employer with the Company for purposes of Code §414 contributes to, has any obligation to contribute to, or has any liability (including withdrawal liability as defined in ERISA §4201) under or with respect to any "multiemployer plan" as defined in ERISA §3(37).

(i) The Company does not maintain, contribute to or have an obligation to contribute to, or have any liability with respect to, any employee welfare benefit plan or other arrangement providing health or life insurance or other welfare-type benefits for current or future retired or terminated directors, officers or employees (or any spouse or other dependent thereof) of the Company or of any other person other than in accordance with COBRA.

(j) To Newhall's Actual Knowledge, each agreement, contract, plan, or other arrangement, whether or not written and whether or not an employee benefit plan, to which the Company is a party that is a "nonqualified deferred compensation plan" subject to Code §409A complies with the requirements of Code §409A(a)(2), (3), and (4) and any Internal Revenue Service guidance issued thereunder, and no amounts under any such agreement, contract, plan, or other arrangement is or has been subject to the interest and additional tax set forth under Code §409A(a)(1)(B). To Newhall's Actual Knowledge, the Company does not have any actual or potential obligation to reimburse or otherwise "gross-up" any person for the interest or additional tax set forth under Code §409A(a)(1)(B).

3.1.12 Leases. To Newhall's Actual Knowledge, Schedule 3.1.12 contains a list of personal property leases entered into by the Company that will be binding upon the Company following the Closing Date that is complete and accurate in all material respects.

3.1.13 Inventory. To Newhall's Actual Knowledge, Schedule 3.1.13 contains a list of Company inventory carried at historical cost as of the Balance Sheet Date that is complete and accurate in all material respects.

3.1.14 Property and Equipment. To Newhall's Actual Knowledge, Schedule 3.1.14 contains a list easement interests, real and personal property, and equipment owned by Company as of the Balance Sheet Date that is complete and accurate in all material respects.

3.1.15 Litigation. Except as set forth on Schedule 3.1.15, as of the Balance Sheet Date, there are no pending and served or, to the Actual Knowledge of Newhall, threatened litigation actions or proceedings against the Company.

3.1.16 Status of Newhall. Neither Newhall nor any of its partners is a “foreign person” as defined in Section 1445(f)(3) of the Code.

3.1.17 No Brokers or Finders. Newhall has not incurred any obligation or liability for any brokerage or finders’ fees or commissions in connection with this Agreement or the transactions contemplated hereby.

3.1.18 Consents and Approvals. Execution and delivery of this Agreement by Newhall, and consummation of the transactions contemplated hereby, by Newhall, do not and will not require, as of the Closing Date, any authorization, registration, or filing with, or consent or approval that has not been obtained of any person, including, without limitation: (i) any federal, state, or other governmental authority or regulatory body other than filing under applicable securities laws; and (ii) any party to a contract whereby, pursuant to the terms of such contract, whether or not such party has waived such right, the consent of such party is required, the failure of which to obtain would have a material adverse effect on the ability of Newhall to perform its obligations under this Agreement.

3.1.19 Hazardous Substances. Except as set forth on Schedule 3.1.19, to Newhall’s present knowledge, without any duty of investigation or inquiry, there are no Hazardous Substances (as defined in Section 4.2 below) in, on or under the Company Assets in violation of applicable Environmental Laws (as defined in Section 4.2 below) in effect as of the date hereof.

3.1.20 Nickel Water. Newhall owns the right to certain water supplies (the “**Nickel Water**”) pursuant to that certain Option and Water Purchase Agreement, dated October 15, 2002, with Nickel Family, LLC (“**Nickel Agreement**”). Pursuant to the Nickel Agreement, Newhall acquired an option to purchase the use of 1,607 acre feet (“af”) of transferable “Exchange Water” made available to Nickel Family, LLC pursuant to that certain Contract to Transfer the Kern River Lower River Water Rights between Nickel Family, LLC, the Olcese Water District, and the Kern County Water Agency dated January 23, 2001. Newhall subsequently exercised its option and now receives the Nickel Water annually under the Nickel Agreement.

3.1.21 Taxes.

(a) For all taxable years of the Company ending on or after December 31, 2005, the Company has filed, or has received a valid extension of time in which to file, all federal, state, and local tax returns relating to Taxes (as defined below), including any schedule or attachment thereto, and including any amendment thereof (collectively, “**Tax Returns**”) that were required to be filed under applicable federal, state, and local laws and regulations on or prior to the Closing Date (the “**Pre-Closing Tax Period**”). To the Actual Knowledge of Newhall, all such Tax Returns were correct and complete in all material respects and to the Actual Knowledge of Newhall were prepared based on tax positions with substantial authority as determined under Treasury Regulation Section 1.6662-4(d). All material Taxes due

and owing by the Company (whether or not shown on any Tax Return) for the Pre-Closing Tax Period have been paid or are reflected in the Pro Forma Balance Sheet. The Company is not the beneficiary of any extension of time within which to file any Tax Return required to have been filed for the Pre-Closing Tax Period. To the Actual Knowledge of Newhall, there are no Liens for Taxes (other than Taxes not yet due and payable) upon any of the assets of the Company. “Tax” or “Taxes” means any Company federal, state or local income, gross receipts, license, payroll, employment, severance, franchise, withholding, social security (or similar), unemployment, disability, real property, personal property or estimated tax, including any interest, penalty, or addition thereto, whether disputed or not. For all purposes of this Agreement, (i) subject to Section 5.6.1, Taxes shall be calculated under the law of the applicable taxing authority as of the Closing Date, and (ii) Taxes do not include any deferred tax liabilities of the Company.

(b) To the Actual Knowledge of Newhall, the Company has withheld and paid all material Taxes required to have been withheld and paid on or before the date hereof (or any such Taxes are properly accrued and reflected in the Pro Forma Balance Sheet) in connection with any amounts paid or owing to any employee, independent contractor, creditor, stockholder, or other third party.

(c) No federal, state or local tax audits or administrative or judicial Tax proceedings are pending or being conducted with respect to the Company.

(d) The Company is not party to any agreement, contract, arrangement or plan that has resulted or could result, separately or in the aggregate, in the payment of any “excess parachute payment” within the meaning of Code §280G (or any corresponding provision of state or local Tax law). To the Actual Knowledge of Newhall and based upon the facts and applicable law in effect at the time of filing such Tax Returns, the Company has disclosed on its federal income Tax Returns all positions taken therein that could give rise to a substantial understatement of federal income Tax within the meaning of Code §6662 for the Pre-Closing Tax Period. The Company is not a party to or bound by any Tax allocation or sharing agreement. During the Pre-Closing Tax Period, the Company (i) has not been a member of an “affiliated group” as defined in Code §1504(a) or any similar group defined under a similar provision of state or local law filing a consolidated federal income Tax Return, and (ii) has no liability for the Taxes of any person other than the Company under Treasury Regulation Section 1.1502-6 (or any similar provision of state or local law), as a transferee or successor, by contract, or otherwise.

(e) Since the date of the Pro Forma Balance Sheet, the Company has not incurred any liability for Taxes arising from extraordinary gains or losses, as that term is used in generally accepted accounting principles, outside the ordinary course of business consistent with past custom and practice.

(f) Except as set forth on Schedule 3.1.21(f), the Company is not required to include any item of income in, or exclude any item of deduction from, taxable income for any taxable period (or portion thereof) ending after the Closing Date as a result of any: (i) change in method of accounting for a taxable period ending on or prior to the Closing Date; (ii) “closing agreement” as defined in Code §7121 (or any corresponding or similar provision of state or local income Tax law) executed on or prior to the Closing Date;

(iii) intercompany transaction or excess loss account described in Treasury Regulations under Code §1502 (or any corresponding or similar provision of state or local income Tax law);
(iv) installment sale or open transaction disposition made on or prior to the Closing Date; or
(v) election under Code §108(i).

(g) During the Pre-Closing Tax Period, the Company has not distributed stock of another person, or has had its stock distributed by another person, in a transaction that was purported or intended to be governed in whole or in part by Code §355 or Code §361.

(h) To the Actual Knowledge of Newhall, for the Pre-Closing Tax Period, the Company is not and has not been a party to any “reportable transaction,” as defined in Code §6707A(c)(1) and Reg. §1.6011-4(b).

(i) The Company has not received any private letter rulings from the Internal Revenue Service, California Board of Equalization or California Franchise Tax Board (or any comparable ruling from any other taxing authority) that relate to the Pre-Closing Tax Period.

3.2 Due Diligence. Newhall has provided to Agency, or has caused Company to provide to Agency, the Financial Statements, the Proforma Balance Sheet, the Note Purchase Agreement, the other documents, materials, returns, reports and other information set forth on Schedule 3.2 attached hereto, and all other documents requested by Agency (collectively, the “**Due Diligence Materials**”) to allow Agency to complete its due diligence investigations of the Company and the Shares. The Due Diligence Materials shall not include (i) any materials subject to the attorney-client and/or work-product privilege, or (ii) confidential materials of Newhall, its attorneys, accountants, agents and other representatives associated with the analysis and negotiation of the transaction contemplated herein.

3.3 Definition of Actual Knowledge. The term “**Actual Knowledge**” means, with respect to Newhall, the actual present knowledge after reasonable inquiry (as distinguished from implied, imputed or constructive) of Donald L. Kimball, Steve Zimmer, and Greg Milleman (collectively, the “**NLF Parties**”). The Agency acknowledges that the NLF Parties are named solely for the purpose of defining and narrowing the scope of the knowledge of Newhall and not for the purpose of imposing any liability on or creating any duties running from the NLF Parties to the Agency (and the NLF Parties shall not have any liability to the Agency). The Agency hereby covenants that it will not bring any action of any nature against the NLF Parties related to or arising out of any representations or warranties set forth in this Agreement. The foregoing representations and warranties of Newhall are hereby qualified by any information contained in the Due Diligence Materials provided to the Agency in accordance with this Agreement or otherwise known to Dan Masnada, General Manager of the Agency, and Valerie Pryor, Administrative Services Manager of the Agency, and Newhall shall not have any liability to the Agency for any inaccurate representation or warranty of Newhall to the extent any such representation or warranty is so qualified. In addition, Newhall shall not be deemed to be in breach of its representations and warranties under this Article III by reason of the failure of Newhall to disclose to the Agency any condition, fact or other matter actually known by Dan Masnada or Valerie Pryor.

ARTICLE IV
REPRESENTATIONS AND WARRANTIES OF AGENCY

4.1 Representations and Warranties. Agency represents and warrants to Newhall, as of the date hereof and as of the Closing Date, as follows:

4.1.1 Authorization. Agency, as a public agency duly organized and validly existing under and pursuant to the laws of the State of California, has the full legal right and capacity to purchase and own the Shares.

4.1.2 Powers. Agency has the full legal right, power, and authority: (i) to enter into this Agreement; (ii) to carry out its obligations hereunder; and (iii) to carry out and consummate all other actions contemplated by this Agreement. The Agency has all requisite power and authority to carry on its activities as now conducted and has met all statutory and other prerequisites for obtaining title to the Shares through settlement of the Condemnation Action, holding the Shares, and taking the other actions described in this Agreement.

4.1.3 Authorization; Necessary Actions; Binding Effect. The Agency, through its Board of Directors at a duly noticed and properly held meeting, has authorized the Agency to execute and deliver and to perform its obligations under this Agreement and any other documents and agreements required to be executed, delivered, and performed hereunder and to consummate the transactions contemplated hereby and thereby. This Agreement constitutes a valid obligation of the Agency and is legally binding on and enforceable against the Agency in accordance with its terms except as such enforceability may be limited by bankruptcy, insolvency, moratorium, or other similar laws affecting creditors' rights.

4.1.4 No Conflict or Violation. The execution, delivery, and performance of this Agreement by the Agency will not result in any of the following, the occurrence of which would have a material adverse effect on the ability of the Agency to perform its obligations under this Agreement:

(a) A violation of, or conflict with, the Agency's enabling act, California Stats. 1962, 1st Ex. Sess., ch. 28, p. 208 (West's California Water Code Appendix, Chapter 103);

(b) A default, breach, or violation, or an event that, with notice or lapse of time, or both, would be a default, breach, or violation, or result in the termination of or accelerate the performance required by Agency or the Company of any material lease, license, franchise, promissory note, conditional sales contract, indenture, mortgage, deed of trust, security or pledge agreement, shareholders or subscription agreement, instrument or other agreement, written or oral to which the Agency or the Company is a party or is subject to or by which its assets are bound;

(c) The termination of any material contract or the acceleration of the maturity of any indebtedness or other material obligation of the Agency or the Company;

(d) The creation or imposition of any Lien on any assets of the Agency or the Company; or

(e) A violation or breach of any writ, injunction, or decree of any court or governmental instrumentality to which the Agency is a party or by which its assets are bound or any laws or regulations applicable to the Agency or its business.

4.1.5 No Brokers or Finders. The Agency has not incurred any obligation or liability for any brokerage or finders' fees or commissions in connection with this Agreement or the transactions contemplated hereby.

4.1.6 Due Diligence. Agency has completed its due diligence investigation of the Company and has made its own independent determination of the value of the Company and the Shares. The Agency has examined all real property and all personal property (tangible or intangible) owned, leased, or otherwise held by the Company and has agreed that, by accepting title to and ownership of the Shares, it (i) is accepting all such property in its as is and where is condition; (ii) recognizes that, except as expressly set forth in this Agreement, neither Newhall nor the Company has made representations or warranties of any kind or nature with respect to the Company, the Shares, the Business, or such real or personal property; and (iii) has agreed that, except in the event of a breach by Newhall of Section 3.1.8 of this Agreement, is assuming all liabilities, known and unknown, related to the Company, the Shares, the Business, and the property, both real and personal, held by the Company (collectively, the **"Company Liabilities"**).

4.1.7 Consents and Approvals. Execution and delivery of this Agreement by the Agency and consummation of the transactions contemplated hereby by the Agency, do not and will not require, as of the Closing Date, any authorization, registration, or filing with, or consent or approval that has not been obtained of any person, including, without limitation: (i) any federal, state, or other governmental authority or regulatory body other than filing under applicable securities laws; and (ii) any party to a contract whereby, pursuant to the terms of such contract, whether or not such party has waived such right, the consent of such party is required, the failure of which to obtain would have a material adverse effect on the ability of the Agency to perform its obligations under this Agreement.

4.1.8 No Other Representations/As-Is Purchase. In furtherance of the provisions of Section 4.1.6, the Agency acknowledges that it is acquiring the Shares, the Company and the Business on an "AS-IS/WHERE-IS" and "WITH ALL FAULTS AND DEFECTS" basis without any representation or warranty of Newhall (or any direct and/or indirect officer, director, shareholder, partner, manager, member, trustee, agent, affiliate or representative of Newhall or the Company (collectively, along with Newhall and the Company, the **"Newhall-Related Parties"**)), express, implied or statutory, as to the Shares, the Company, the Business, the assets of the Company (collectively, the **"Company Assets"**) and the Company Liabilities. The Agency hereby represents that the Agency is a knowledgeable and sophisticated buyer, that the Agency is relying solely upon, and has conducted, its own, independent inspection, investigation and analysis of the Due Diligence Materials (and each document and item of information referred to therein), the Shares, the Company, the Business, the Company Assets and the Company Liabilities, as the Agency deems necessary and/or appropriate in so acquiring the Shares, and the suitability of the Shares, the Company and the Business for the Agency's intended purposes, and is not relying upon the Due Diligence Materials or any other agreements, reports, documents or other information provided to the Agency by Newhall or any of the other

Newhall-Related Parties. As to any Due Diligence Materials prepared by third parties, the Agency specifically acknowledges that the Agency has no privity with such third parties and the Agency acknowledges and agrees that no warranty or representation, express or implied, has been made, nor shall any be deemed to have been made, to the Agency with respect thereto, either by the Newhall-Related Parties, the Company or by any third parties that prepared the same.

4.2 Hazardous Substances. Except as expressly set forth in Section 3.1 hereof, none of the Newhall Parties has made any representations or warranties regarding the compliance of Company Assets with Governmental Regulations and the existence or absence of Hazardous Substances or, about, under or in the vicinity of any of the Company Assets. The Agency agrees that any clean-up, removal or remediation of Hazardous Substances or other environmental conditions regarding the Company Assets will not be the responsibility of, and will be performed at no cost to, Newhall, and the Agency hereby indemnifies, defends (with counsel selected by Newhall), and holds the Newhall-Related Parties harmless from any and all costs, loss, damages or expenses of any kind or nature arising out of or resulting from any clean-up, removal or remediation of Hazardous Substances or other environmental conditions on the Company Assets. The term "Governmental Regulations" means any laws (including Environmental Laws), ordinances, rules, requirements, resolutions, policy statements and regulations (including, without limitation, those relating to land use, subdivision, zoning, Hazardous Substances, occupational health and safety, handicapped access, water, earthquake hazard reduction, and building and fire codes) of any governmental or quasi-governmental body or agency claiming jurisdiction over the Company Assets. The term "Environmental Laws" means all federal, state and local laws, ordinances, rules and regulations now or hereafter in force, whether statutory or common law, as amended from time to time, and all federal and state court decisions, consent decrees and orders interpreting or enforcing any of the foregoing, in any way relating to or regulating human health or safety, or industrial hygiene or environmental conditions, or protection of the environment, or pollution or contamination of the air, soil, surface water or groundwater, and includes, without limitation, the Comprehensive Environmental Response, Compensation and Liability Act of 1980, 42 U.S.C. § 9601 *et seq.*, the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 *et seq.*, and the Clean Water Act, 33 U.S.C. § 1251 *et seq.* The term "Hazardous Substances" means any substance or material that is described as a toxic or hazardous substance, waste or material or a pollutant or contaminant, or words of similar import, in any of the Environmental Laws, and includes asbestos, petroleum (including crude oil or any fraction thereof, natural gas, natural gas liquids, liquefied natural gas, or synthetic gas usable for fuel, or any mixture thereof), petroleum-based products and petroleum additives and derived substances, lead-based paint, mold, fungi or bacterial matter, polychlorinated biphenyls, urea formaldehyde, radon gas, radioactive matter, medical waste, and chemicals which may cause cancer or reproductive toxicity.

4.3 Release of Claims.

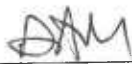
4.3.1 Release. Except for all of Newhall's covenants, obligations, undertakings, representations and warranties set forth in this Agreement which survive the Closing Date, the Agency, on its own behalf, and on behalf of its respective direct and indirect officers, directors, shareholders, partners, managers, members, trustees, affiliates, agents and representatives and its successors and assigns (collectively, the "**Agency-Related Parties**"), hereby fully and forever

waive, release and discharge Newhall and the other Newhall-Related Parties (collectively, the “**Releasees**”) from and against any and all manner of action or actions, cause or causes of action, at law or in equity, suits, debts, liens, contracts, agreements, rights, promises, liabilities, claims, obligations, demands, damages, losses, costs, penalties, fees (including, without limitation, attorney’s and expert witness fees and costs), and/or expenses, of any kind or nature whatsoever, known or unknown, existing as of the date hereof or hereinafter arising, suspected or unsuspected, concealed or hidden, fixed or contingent (collectively, the “**Released Claims**”) that arise out of or relate to events occurring prior to the Closing Date, which the Agency or any of the other Agency-Related Parties (collectively, the “**Releasors**”) now has, ever had, or may hereafter have against any one (1) or more of the Releasees, by reason of any matter, cause, or thing whatsoever arising out of, or related in any way (i) to the Shares, the Company, the Business, the Company Assets and the Company Liabilities, and (ii) any and all responsibilities and liabilities, including, without limitation, liabilities under the Environmental Laws, regarding the condition (including the presence in the soil, air, structures and surface and subsurface waters), of any Hazardous Materials, or other materials or substances that have been or may in the future be determined to be toxic, hazardous, undesirable or subject to regulation and that may need to be specifically treated, handled and/or removed from the Company Assets under current or future federal, state and local laws, regulations or guidelines).

4.3.2 Complete Release. Each Releasor intends, through the releases provided for in this Section 4.3 above, to fully, and finally, and forever settle, release, and extinguish (as a full and final accord and satisfaction) all Released Claims that such Releasor may now or hereinafter have against such Releasor’s respective Releasees and referenced in this Section 4.3. In furtherance of such intention, the releases herein given shall be and remain in effect as full and complete releases of the relevant Released Claims released notwithstanding the discovery of the existence of any additional Released Claims or facts related thereto. Accordingly, as a condition of this Agreement, each Releasor hereby acknowledges that any and all releases made by such Releasor pursuant to this Section 4.3 shall extend to any and all Released Claims which such Releasor does not know or suspect to exist in such Releasor’s favor at the time this Agreement is fully executed and delivered, even if the knowledge of such Released Claims on the part of such Releasor would have materially affected such Releasor’s settlement with such Releasor’s respective Releasees.

4.3.3 Waiver of Civil Code Section 1542. The Agency, on behalf of itself and the Releasors, hereby expressly waives and relinquishes all rights and benefits the Agency and the Releasors may have under Section 1542 of the Civil Code of the State of California with respect to the Released Claims that are the subject of the limited releases set forth in this Section 4.3. Civil Code Section 1542 reads as follows:

“§1542 A GENERAL RELEASE DOES NOT EXTEND TO CLAIMS WHICH THE CREDITOR DOES NOT KNOW OR SUSPECT TO EXIST IN HIS OR HER FAVOR AT THE TIME OF EXECUTING THE RELEASE, WHICH IF KNOWN BY HIM OR HER MUST HAVE MATERIALLY AFFECTED HIS OR HER SETTLEMENT WITH THE DEBTOR.”


AGENCY'S INITIALS

4.3.4 Restatement of Release. The releases set forth in this Section 4.3 shall be deemed to be remade as of the Closing Date and shall survive the Closing Date.

ARTICLE V

COVENANTS OF COMPANY, AGENCY, AND NEWHALL

5.1 Conduct of Business. During the period commencing on the execution and delivery of this Agreement and ending on the Closing Date, the Company shall continue to conduct the Company's Business and affairs in the ordinary and normal course, including commercially reasonable efforts to maintain relationships with the Company's customers, distributors, suppliers, vendors, employees, agents, regulators and others. Except as otherwise provided herein, and except for those obligations incurred in connection with the subject transaction, subsequent to the date of this Agreement, the Company shall not without first obtaining the Agency's prior written consent, which shall not be unreasonably withheld, conditioned, or delayed: (i) enter into, modify or terminate any contract or transaction which is material to the Business or the Company's financial condition, operating results or prospects; (ii) incur any liabilities (other than liabilities in the ordinary course of business); (iii) make any capital expenditure other than in the ordinary course of business; (iv) issue any additional shares of stock; or (v) make or change any federal or state tax, election, change an annual accounting period, adopt or change any accounting method, file any amended Tax Return (other than claims for carry-backs for net operating losses and/ or other tax attributes), enter into any federal or state tax closing agreement, settle any Tax claim or assessment relating to the Company, surrender any right to claim a refund of Taxes, consent to any extension or waiver of the limitation period applicable to any Tax claim or assessment relating to the Company, or take any other similar material action relating to the filing of any Tax Return or the payment of any Tax, if such election, adoption, change, amendment, agreement, settlement, surrender, consent or other action would have the effect of materially increasing the Tax liability of the Company for the Post-Closing Tax Period or materially decreasing any Tax attribute of the Company existing on the Closing Date. In addition, except for payment for the Preferred Shares or as otherwise provided herein, from and after the date hereof, the Company shall not distribute cash, cash equivalents, or non-cash assets of the Company (other than in the ordinary course of business) without the prior written consent of Agency.

5.2 Reasonable Efforts of Company. The Company shall use commercially reasonable efforts to take, or cause to be taken, those actions and to do, or cause to be done, those things necessary to fulfill the conditions precedent to the other party's obligations hereunder and to consummate and make effective as promptly as reasonably practicable the transactions contemplated by this Agreement and to cooperate reasonably with each other in connection with the foregoing. The Company shall use commercially reasonable efforts to secure all consents, approvals, waivers and authorizations required or necessary from other parties to any material contract or under applicable laws in order to consummate the transactions contemplated by this Agreement.

5.3 Reasonable Efforts of Newhall. Newhall shall use its commercially reasonable efforts to take, or cause to be taken, those actions and to do, or cause to be done, those things

reasonably necessary to fulfill the conditions precedent to Agency's obligations hereunder and to consummate and make effective as promptly as reasonably practicable the transactions contemplated by this Agreement and to cooperate reasonably with the Agency in connection with the foregoing. Newhall shall use its commercially reasonable efforts to secure all consents, approvals, waivers, and authorizations required or necessary from other parties to any material contract or under applicable laws in order to consummate the transactions contemplated by this Agreement.

5.4 Post Closing Covenants of Newhall and Company. Should it be determined, after the Closing Date, that one or more required consents, approvals, waivers, and authorizations had not been secured by the Company or Newhall, the Agency shall so notify Newhall and the Company and Newhall and the Company, at Newhall's sole expense, shall promptly use their reasonable efforts to secure such consents, approvals, waivers, and/or authorizations from the applicable entity or entities. Provided that any such consents, approvals, waivers, and/or authorizations are thereafter obtained, the failure to obtain them prior to the Closing Date shall not be deemed a breach of this Agreement.

5.5 Reasonable Efforts of Agency. The Agency shall use its commercially reasonable efforts to take, or cause to be taken, those actions and to do, or cause to be done, those things necessary to fulfill the conditions precedent to Newhall's obligations hereunder and to consummate and make effective as promptly as reasonably practicable the transactions contemplated by this Agreement and to cooperate reasonably with Newhall in connection with the foregoing. The Agency shall use its commercially reasonable efforts to secure all consents, approvals, waivers and authorizations required or necessary from other parties to any material contract or under applicable laws in order to consummate the transactions contemplated by this Agreement.

5.6 Tax Matters. The following provisions shall govern the allocation of responsibility as between the Agency and Newhall for certain tax matters:

5.6.1 Income Tax Obligations. Subject to the limitations set forth in this Section 5.6.1 and Section 5.6.5, Newhall shall be responsible for all federal and California State income taxes of the Company (the "**Income Taxes**") that relate to the Pre-Closing Tax Period; provided, however, the Parties agree to allocate responsibility for Income Taxes for the Interim Period (defined below) and, if necessary, to make an adjustment to the Purchase Price as follows:

(a) the Income Tax payable for the interim period commencing on January 1, 2012 and ending on the Closing Date (the "**Interim Period**") shall be calculated in accordance with Schedule 5.6.1;

(b) for purposes of calculating the Income Taxes for the Interim Period, (1) the federal Income Tax liability of the Company for 2012 shall be determined using a rate of thirty-four percent (34%), (2) the California State Income Tax liability of the Company for 2012 shall be determined using a rate of eight and 84/100ths percent (8.84%) and (3) for 2013 (should the Interim Period extend beyond December 31, 2012) the federal and State rates used shall be the actual rates in effect for that year;

(c) within ninety (90) days following the Closing Date, representatives of Newhall and the Agency shall meet at the principal office of Newhall to determine whether it is necessary to make an adjustment to the Purchase Price solely to reflect the differences between the estimated Income Tax actually paid by the Company for the Interim Period set forth on Schedule 5.6.1 (the “**Estimated Tax Payments**”) and the actual Income Tax payable by the Company for the Interim Period based on the rates set forth in clauses (1) and (2) above in subsection (b) above (the “**Interim Period Actual Tax Liability**”); and

(d) notwithstanding the foregoing, Newhall shall not be responsible for any Taxes (the “**Additional Taxes**”) resulting from any action, inaction, election, distribution, sale, transfer, merger, liquidation, conversion, reorganization and/or other transaction taken by the Company or the Agency on or following the Closing Date.

If it is determined that the Estimated Tax Payments exceed the Interim Period Actual Tax Liability (the “**Estimated Tax Payment Overage**”), then the Agency shall pay, or shall cause the Company to pay, to Newhall the Estimated Tax Payment Overage within ten (10) business days after the date the Estimated Tax Payment Overage is determined. If it is determined that the Interim Period Actual Tax Liability exceeds the Estimated Tax Payments (the “**Tax Payment Shortfall**”), then Newhall shall pay the Tax Payment Shortfall to the Agency within ten (10) business days after the date the Tax Payment Shortfall is determined. The Agency shall be responsible for (x) all unpaid Income Taxes reflected in the Pro Forma Balance Sheet that relate to any period (or that are attributable to any action, inaction, election, distribution, sale, transfer, merger, liquidation, conversion, reorganization and/or other transaction taken by the Company or the Agency) following the Closing Date (such period following the Closing Date, the “**Post-Closing Tax Period**”) and (y) all Additional Taxes. For avoidance of doubt, Newhall shall not have any responsibility for any Income Taxes that have already been paid or that are reflected in the Proforma Balance Sheet.

For purposes of clauses (a) and (x) of this Section 5.6.1, any taxable period that includes (but does not end on) the Closing Date shall constitute a Pre-Closing Tax Period only until (and shall be deemed to end on) the Closing Date, and the amount of any Income Taxes which are based on or measured by income or gross receipts of the Company for such Pre-Closing Tax Period shall be determined based on an interim closing of the books as of the close of business on the Closing Date. Any other Income Taxes of the Company which relate to any such Pre-Closing Tax Period shall be allocated between the Pre-Closing Tax Period and the Post-Closing Tax Period based upon the daily accrual of such income Taxes up to and including the Closing Date or pursuant to any other reasonable method chosen by Newhall in accordance with applicable laws. The Parties acknowledge and agree that any Tax refunds, net operating losses, credits, overpayments or other benefits that relate to the Pre-Closing Tax Period shall constitute the sole property of Newhall and that any Tax refunds, credits, overpayments or other benefits that relate to the Post-Closing Tax Period shall constitute the sole property of the Agency or the Company.

5.6.2 Responsibility for Filing Tax Returns. Except as provided in Section 5.6.5 below, the Agency shall prepare or cause to be prepared and file or cause to be filed all Tax Returns for the Company that are filed after the Closing Date. With respect to Tax Returns that include any Pre-Closing Tax Period, the Agency shall provide such Tax Returns to Newhall for

its review and approval at least thirty (30) days prior to the date any such returns are required to be filed (taking into account any extensions). Such Tax Returns shall be prepared in a manner reasonably consistent with any such Tax Returns previously filed by the Company for any Pre-Closing Tax Period, and the Agency shall not (and shall cause the Company not) to make or change any federal or state tax election, accounting period, or any accounting method, to file any amended Tax Return, to enter into any federal or state tax closing agreement, to settle any Tax claim or assessment relating to the Company, to surrender any right to claim a refund of Taxes, to consent to any extension or waiver of the limitation period applicable to any Tax claim or assessment relating to the Company, or to take any other similar material action relating to the filing election or take any tax position, whether included as part of such Tax Return or otherwise, which may increase the taxes of Newhall or the Company attributable to the Pre-Closing Tax Period. Should Newhall object to the filing of any such Tax Return as prepared by the Agency, Newhall shall notify the Agency of its specific objections in writing no later than fifteen (15) days subsequent to the date such Tax Return was provided to Newhall for approval pursuant to this Section 5.6.2. If Newhall and the Agency cannot agree on the resolution of Newhall's objections prior to the filing of any such Tax Return, the Agency shall be responsible for any additional Taxes attributable to a Pre-Closing Tax Period which is attributable to such filing.

5.6.3 Cooperation on Tax Matters.

(a) The Agency, the Company and Newhall shall cooperate fully, as and to the extent reasonably requested by the other party, in connection with the filing of Tax Returns pursuant to Section 5.6.2 and any audit, litigation or other proceeding with respect to Taxes; provided that with respect to any Taxes at issue in any such audit, litigation or other proceeding, the party responsible for such Taxes under this Agreement shall also have primary responsibility for, and the right to control at its own expense, such audit, litigation or other proceeding (and the disposition thereof). Such cooperation shall include, without limitation, (i) promptly notifying the other party of any threatened, actual or pending audit, litigation, proceeding, or any other material correspondence or notice received from any taxing authority, and (ii) the retention and (upon the other party's request) the provision of records and information that are reasonably relevant to any such audit, litigation or other proceeding and making employees available on a mutually convenient basis to provide additional information and explanation of any material provided hereunder, provided that any such records or information are not confidential or protected by the attorney-client privilege. The Company and Newhall agree (A) to retain all books and records with respect to Tax matters pertinent to the Company relating to the Pre-Closing Tax Period that are in the possession and control of either such party as of the Closing Date until the expiration of the statute of limitations (and, to the extent notified in writing by the Agency or Newhall, any extensions thereof) of the respective taxable periods, and to abide by all record retention agreements entered into with any federal, state, or local taxing authority, and (B) to give the other party reasonable written notice prior to transferring, destroying or discarding any such books and records and, if the other party so requests, the Company or Newhall, as the case may be, shall allow the other party to take possession of such books and records. If, as a result of any adjustment by any taxing authority of any Tax Return that relates to the Pre-Closing Tax Period, the Company and/or the Agency (or any affiliate thereof) derives a tax benefit for the Post-Closing Tax Period, then the Agency shall pay to Newhall the value of such tax benefit within thirty (30) days following the date such tax benefit is realized.

(b) The Agency and Newhall further agree, upon request, to use their commercially reasonable efforts to obtain any certificate or other document from any governmental authority or any other Person as may be necessary to mitigate, reduce or eliminate any Tax that could be imposed (including, but not limited to, with respect to the transactions contemplated hereby); provided, however, no such certificate or other document shall be sought or obtained by the Agency, the Company or Newhall if such Certificate or document would lead to an increase in the Taxes of the Company or Newhall for any Pre-Closing Tax Period.

(c) The Agency and Newhall further agree, upon request, to provide the other party with all information that either party may be required to report pursuant to Code §6043, or Code §6043A, or Treasury Regulations promulgated thereunder.

5.6.4 Tax-Sharing Agreements. All tax-sharing agreements or similar agreements with respect to or involving the Company shall be terminated as of the Closing Date and, after the Closing Date, the Company shall not be bound thereby or have any liability thereunder.

5.6.5 Certain Taxes and Fees. All Transaction Taxes incurred in connection with consummation of the transactions contemplated by this Agreement shall be paid by the Agency when due, and the Agency will, at its own expense, file all necessary Tax Returns and other documentation with respect to all the Transaction Taxes, fees and charges, and, if required by applicable law, Newhall will, and will cause its affiliates to, join in the execution of any such Tax Returns and other documentation.

ARTICLE VI

PROVISIONS REGARDING WATER RIGHTS AND WATER SERVICE

6.1 California Public Utilities Commission. On the Closing Date, Agency shall notify the PUC, in writing, that it has obtained the Shares through settlement of an eminent domain proceeding and that the Company intends to continue operating under its existing certificate and tariffs.

6.2 Water Rights and Operation of the Company.

6.2.1 Interim Operation. For seventy-five (75) days from the Closing Date, Agency shall conduct the Company's Business and affairs in the ordinary and normal course as it was being operated prior to the Closing Date and shall not, without the written consent of Donald Kimball, the designee selected by Newhall ("**Newhall Designee**"): (i) permit the sale, encumbrance, transfer, limitation, or assignment of any material real or personal property or any interests therein held by the Company as of the Closing Date, including but not limited to water-related rights; (ii) permit or carry out any material changes in Company personnel or their wages, benefits, or working conditions except as may be required by federal, state or local laws or regulations; or (iii) take any affirmative action or consent to an action by any third party that would alter or permit the alteration of the status of the Company as a PUC-regulated entity. During this 75-day period, the Agency shall not engage in or permit any act or omission which would materially, negatively affect the value of the Company or its ability to provide water service to existing and future water users within its service area, including but not limited to, its ability to perfect and secure all water rights and supplies, permits, and applications of the

Company. Newhall may change the identity of the Newhall Designee at any time by written notice to Agency and Company.

6.2.2 Operation In The Event Of Litigation. In the event, during the seventy-five (75)-day period set forth in section 6.2.1, an action is filed in court or before any administrative agency (i) challenging the right of the Agency to acquire the Shares, including pursuant to its power of eminent domain, or (ii) claiming that the Agency exceeded the powers of its authorizing statute in entering into and performing the terms of this Agreement, including operating the Business, Agency and Company, until a final, non-appealable judgment or order is obtained in that action or the action is otherwise dismissed with prejudice, (a) shall diligently conduct the Company's Business and affairs in the ordinary and normal course as it was being operated immediately prior to the Closing Date and (b) except in the ordinary course of business, shall not, without the written consent of the Newhall Designee: (i) permit the sale, encumbrance, transfer, limitation, or assignment of any real or personal property or any interests therein held by the Company as of the Closing Date, including but not limited to water-related rights; (ii) engage in or permit any act or omission which would materially, negatively affect the value of the Company or its ability to provide water service to existing and future water users within its service area, including but not limited to, its ability to perfect and secure all water rights and supplies, permits, and applications of the Company; or (iii) take any affirmative action or consent to an action by any third party that would alter or permit the alteration of the status of the Company as a PUC-regulated entity.

6.2.3 Operation in the Absence of or After Litigation. Should the Agency or the Company, after expiration of the interim operation obligations set forth in Sections 6.2.1 and 6.2.2, determine to merge, change, consolidate, or otherwise transfer the operations of the Company with or into the operations of the Agency or a joint powers agency of which Agency is a member, it shall not effect such merger, change, consolidation or transfer until seventy-five (75) days after adoption of the resolution authorizing such action. The Parties stipulate that the Agency's agreement to defer the effective date of any such merger, change, consolidation or transfer as provided by this paragraph represents a central consideration for the settlement of the eminent domain action filed by the Agency and that Newhall may specifically enforce the Agency's obligations hereunder or file an action challenging the Agency's authority to carry out such a merger, change, consolidation, or transfer.

6.2.4 Insurance. The Agency shall take all necessary steps to ensure that the Company insurance policies listed on Schedule 6.2.4 of this Agreement remain in full force and effect after the Closing Date. Newhall and/or the Company shall ensure that the policies listed on Schedule 6.2.4 are effective on the Closing Date.

6.2.5 Frozen Defined Benefit Plan. Newhall shall be solely responsible for administering and providing all necessary funding for the frozen defined benefit plan described more particularly on Schedule 6.2.5 attached hereto that currently covers certain of the existing employees (as of the Closing Date) and past employees, and will indemnify and hold harmless Company and the Agency from any costs or expenses related to such plan.

6.2.6 Cooperation. Agency, to insure timely completion of water service facilities, shall cooperate with Newhall in the development of water supply infrastructure needed to serve Newhall projects located within the Company's or Agency's service areas. Agency,

when necessary to ensure such timely completion, will, to the extent authorized by law, enter into agreements with Newhall whereby Newhall or its agents can construct such facilities and turn them over to the Agency or Company for operation and maintenance. The Agency shall retain the right to review water system master plans and facility designs and observe facility construction and notify Company and Newhall of any inconsistencies with the facility standards of the Agency that would require remediation before acceptance by the Agency.

6.2.7 401k Plan. As of the Closing Date, the Company will cease to be a participating employer in The Newhall Land and Farming Company Employee Savings Plan (the “**Newhall Savings Plan**”) and the employees of the Company will no longer be eligible to participate or accrue any benefits in the Newhall Savings Plan. As soon as administratively possible, but in no event later than sixty (60) days after the Closing Date, the Agency shall ensure that the Company establishes a new savings plan (the “Valencia Water Company Employees **Savings Plan**”) substantially similar to the Newhall Savings Plan. As soon as practicable after the Agency Plan is established, but in no event later than seventy-five (75) days after the Closing Date, Newhall and the Agency shall take all necessary and appropriate actions to transfer the Newhall Savings Plan accounts of all employees of the Company and any outstanding participant loans to the Agency Savings Plan (the “**Transfer**”). This includes, but is not limited to, instructing the third-party administrator to take any and all necessary actions required for the Transfer. Newhall and Buyer shall reasonably cooperate to effectuate the Transfer.

6.2.8 Welfare Benefit Plans. As of the Closing Date, the Company sponsored health and welfare benefit plans listed on Schedule 6.2.8 shall be, and shall remain, in effect.

6.3 Newhall/SRV/Company Retail Water Demand Agreements. Agency acknowledges that, in addition to the matters disclosed in Section 3.1 of this Agreement, Newhall and SRV have each, entered into an agreement with Company entitled “Agreement Establishing Process for Determining Water Demands,” (the “**Newhall/SRV/Company Agreements**”), copies of which has been provided to Agency. Agency shall not directly or indirectly cause or permit Company or Company’s successor to breach the Newhall/SRV/Company Agreements, or take any action or fail to take any action that would result in Company’s or Company’s successor’s breach thereof. Should Agency merge, change, consolidate, or otherwise transfer the assets or operations of the Company with or into the Agency, a joint powers agency of which the Agency is a member, any other entity with which the Agency is affiliated, the Agency shall assume or cause the entity with which the Agency is affiliated to assume the Newhall/SRV/Company Agreements. The Parties recognize and agree that the obligations to fully abide by the terms and conditions of the Newhall/SRV/Company Agreements relate solely to the Company’s or any assuming entity’s retail water service functions and responsibilities and that said agreement is not intended to limit or control the Agency’s wholesale and water supply planning functions and responsibilities.

6.4 Annexation of the Legacy Property. Newhall hereby informs and the Agency acknowledges and agrees that Newhall has informed it that, through an affiliate (SRV), Newhall has an interest in those certain lands known as Legacy Village (“**Legacy**”), which consists of residential and non-residential development situated south of the Newhall Ranch Specific Plan. Los Angeles County has not yet adopted project approvals for Legacy, however, to date, SRV

has submitted to the County a proposed tentative tract map (No. 061996) for Legacy. The Parties recognize that the Legacy property is not located within the Agency service area and that annexation of the Legacy property to the Agency, in conformity with the Agency's Annexation Policy, must occur before water service to Legacy can be provided by Company or any successor of the Company. For Legacy, the terms of this Agreement are intended solely to confirm the availability of a firm water supply adequate to meet water supply requirements of the Los Angeles County Local Agency Formation Commission ("**LAFCO**") and the Agency Annexation Policy for the annexation of the Legacy lands into the Agency. Nothing in this Agreement shall be interpreted to limit or otherwise affect the obligation of the Company, as the retail water purveyor for Legacy, to provide a water supply assessment to Los Angeles County pursuant to Water Code section 10910 et seq. for use by the County in carrying out its land use planning authority.

6.5 Legacy Water Supply. Commencing on the Closing Date and subject to the terms and conditions of the Pre-Annexation Agreement between SRV and the Agency referenced in paragraph 7.1(f) of this Agreement, the Agency will irrevocably reserve for the a period of time set forth in the Pre-Annexation Agreement 2,500 acre-feet per year of Agency water (the "**Annexation Water**"), which, for Legacy, the Parties agree is a sufficient amount of potable water to meet the Agency's Annexation Policy based on the development plan set out on **Schedule 6.5** to this Agreement. The carrying cost for the Annexation Water will continue to be borne by the Agency until the Legacy property is annexed into the Agency service area and the Annexation Water is put to "beneficial use" (as that term is defined in the Pre-Annexation Agreement) within Legacy. Prior to filing a Legacy annexation application with L.A. LAFCO, Newhall and the Agency shall diligently and in good faith develop an equitable financial mechanism mutually acceptable to Newhall and the Agency that allocates the cost of Annexation Water to landowners/water users within Legacy. The costs so determined will become effective at the time of annexation, but will not be implemented as to any parcel or lot until the Annexation Water is put to Beneficial Use (as the term is defined in the Pre-Annexation Agreement) for each water user. The selected financial mechanism shall equitably reflect the equivalent cost to the area of receiving Buena Vista/Rosedale-Rio Bravo Water Banking and Recovery Program ("**BV/RRB Program**") water in accordance with current Agency practices and policies. Based on the agreement to irrevocably reserve 2500 acre feet of Annexation Water, and in consideration of (i) the potential transfer of surplus Nickel Water pursuant to this Agreement; (ii) the transfer of the Saugus Formation well sites pursuant to Section 6.10; (iii) the recycled water facilities for Legacy, and (iv) other consideration set forth in this Agreement, including, in part, the payment of the supplemental facility capacity fees pursuant to Section 6.12, the Agency finds, and based on that finding agrees, that for the Legacy property Newhall has met all potable water supply conditions of the Agency's Annexation Policy. At Newhall's request, in any annexation proceedings for Legacy involving the Agency, Los Angeles County, LAFCO, the California Department of Water Resources, or any other federal, state, or local agency, Agency shall inform all appropriate persons or entities that the Agency has determined that annexation of Legacy into the Agency will be consistent with all Agency policies related to water supplies. The Agency further agrees that, provided the conditions set forth in section 4 of the Pre-Annexation Agreement are met, the water supply elements of the Agency's annexation policy in effect on the Closing Date shall be the water supply elements used by the Agency for annexation of the Legacy property.

6.6 Deposit and Funding Agreement. Upon payment of the amount set forth below, the Deposit and Funding Agreement entered into between the Agency and SRV, dated January 23, 2007, which was entered into to defray Agency costs incurred in processing the feasibility of the proposed annexation of the Legacy lands into the Agency's service area and to reserve sufficient water supplies that had been acquired by the Agency to meet annexation needs for Legacy, will be terminated and of no further force or effect. The Agency and Newhall acknowledge that Newhall's affiliate deposited the amount of two million three hundred seventy-eight thousand eight hundred four dollars (\$2,378,804) with Agency pursuant to such Deposit and Funding Agreement. Agency shall refund such amount to SRV at the Closing by wire transfer using the instructions set forth in Section 2.2.1 of this Agreement (but via a wire transfer separate from the wire transfer described in Section 2.2.1.). On the Closing Date, Newhall will provide Agency with a letter from SRV authorizing (a) delivery of the funds to Newhall on behalf of SRV and (b) termination of the 2007 Deposit and Funding Agreement.

6.7 Nickel Water and Facility Capacity Fees. (a) The Agency acknowledges without independent investigation, that Newhall owns the right to the Nickel Water and the Parties agree that the Nickel Water is not subject to contractual or other shortage provisions. Based upon the Agency's acknowledgement and agreement in this Section 6.7, for itself and as the owner of the Company's Shares, the Parties agree that:

- (i) Because the Nickel Water is not subject to contractual or other shortage provisions, when the right to receive any of the Nickel Water is conveyed by Newhall to Agency, it shall be deemed a firm supply.
- (ii) Upon Newhall transferring or assigning to the Agency or the Company any of its Nickel Water rights, and the Agency or the Company acquiring such Nickel Water rights, the Agency shall credit Newhall with one acre-foot of water towards meeting any applicable water demand requirement for each acre-foot of Nickel Water so acquired
- (iii) Agency or Company acknowledge and agree that any transfer or assignment by Newhall to Agency or Company of any of Newhall's rights to Nickel Water will not impact the availability or reliability of the water supplies for the Newhall Ranch Specific Plan.

(b) Newhall agrees that Agency shall have the authority to, and Newhall shall not protest, oppose, or attempt to annul the levy of a supplemental Facility Capacity Fee within the Newhall Ranch Specific Plan, that will generate approximately, but not more than, \$6,000,000. The amount of the supplemental Facility Capacity Fee necessary to generate \$6,000,000 in the aggregate shall be calculated using the Agency's standard methodology for determining such fees and shall be paid at the same time and manner other similar fees are due and payable under Agency ordinances or regulations.

6.8 Conveyance of Nickel Water. Notwithstanding any other provision of this Agreement, by not later than ninety (90) days after Newhall has received from Los Angeles County a final non-reviewable approval (and a final non-appealable judgment or order is obtained in any legal, equitable or administrative action challenging such approval) of the final

tentative map for the Newhall Ranch project, Newhall, the Agency, and the Company shall determine (based on the amount, if any, by which the groundwater amounts set forth in the Newhall/SRV/Company Agreements are insufficient to meet potable water requirements within the Newhall Ranch Specific Plan) how much, if any, Nickel Water is needed to make up such insufficiency. At that time, Newhall shall convey and assign to the Agency or the Company (as determined by the Agency) all of its rights in and to the Nickel Water, and all of its rights and obligations under the Nickel Agreement. Upon conveyance and assignment of the Nickel Agreement, the Agency or the Company shall assume all obligations of Newhall with respect to such agreement; provided, however, for ten (10) years from the date of this Agreement, Newhall shall have the obligation to reimburse the Agency or Company for the annual costs to acquire and transport that portion of the Nickel Water not used by the Agency in any year for Agency purposes. After the date set forth in the proviso in the prior sentence, Newhall's reimbursement obligation shall be limited to reimbursing Agency for the annual costs to acquire and transport that part of the Nickel Water not being put to beneficial use within the Newhall Ranch Specific Plan that is needed to meet calculated future water demands within the Newhall Ranch Specific Plan; provided, however, that the Agency shall pay all acquisition and transportation costs associated with any such water used by the Agency in any year for interim Agency purposes. Notwithstanding any contrary rule, regulation, policy, resolution, or ordinance of the Agency, the Company, the PUC, or LAFCO, upon assignment or conveyance by Newhall, the Agency shall hold in trust for Newhall or its designee, all rights and water supplies described in this Section 6.8 that are needed to provide water service to the Newhall Ranch Specific Plan, and all associated rights thereto, until such rights or water supplies are required to meet actual demands for the Newhall Ranch Specific Plan. Upon Newhall's conveyance of Nickel Water, the Agency or the Company shall take all appropriate steps to ensure that the Nickel Water can be conveyed via the State Water Project system through point of delivery agreements.

6.9 Review by Agency. Agency acknowledges that it has received a copy of the Nickel Agreement and has reviewed and understands such document, including without limitation, all documents referenced in the Nickel Agreement. Newhall agrees to fully comply with its obligations under the Nickel Agreement. Newhall hereby grants the Agency, as its sole and exclusive remedy, shall have the right to cure any default by Newhall under the Nickel Agreement.

6.10 Saugus Formation Well Sites. Newhall shall convey to Agency, at no cost to Agency, easements to four well sites for the purpose of allowing the Agency to construct, operate, and maintain up to four wells for extraction of water from the Saugus Formation aquifer. The well sites will be at locations mutually agreed to by Agency and Newhall, taking into consideration Newhall's development plans for its properties. Once a well site location has mutually approved and a legal description prepared of such well site, the Parties shall enter into a mutually acceptable easement agreement for such well site, which shall be recorded in the official records of Los Angeles County, California. The Parties agree that should efforts to develop municipal water wells fail on up to two (2) of such Well Sites, Agency shall have the option to reconvey to Newhall its interest in the failed site(s) in exchange for up to two additional sites. This exchange right shall expire ten (10) years from the Closing Date. Agency and Newhall shall agree on the locations of the four (4) well sites and the two (2) exchange sites not later than two (2) years after the Closing Date.

6.11 Non-Potable Water. In consideration of (i) the settlement set out in this Agreement, (ii) the provision of the Nickel Water, the Saugus Formation well sites, the Newhall Ranch Specific Plan groundwater, and the non-potable water these water assets will generate, (iii) construction and implementation of the non-potable water system set forth in the Newhall Ranch Specific Plan and for the Westside Properties (including Legacy), and (iv) the payment of taxes, facility capacity fees, and other tariffed rates, fees, and costs that have been or will be paid by Newhall or its successors in interest for the Newhall Ranch Specific Plan properties and the Westside Properties, the Agency agrees that non-potable water equal to the amounts required to meet the non-potable water demands of all such properties will be provided to such properties by the Agency or the Company without further payment or other consideration other than those set forth above. The Agency further agrees that, in any annexation, advice letter, water management program, or urban water management plan proceedings, it shall inform the appropriate entity that all needed non-potable water supplies described in this paragraph will be provided for the properties.

ARTICLE VII

CLOSING OBLIGATIONS AND CONDITIONS

7.1 Obligations of Newhall and Company at Closing. The obligation of Agency to acquire the Shares pursuant to this Agreement shall be subject to the satisfaction or waiver by Agency in writing on or prior to the Closing Date of each of the following conditions:

(a) Newhall shall have delivered to the Agency the certificate representing the Shares as provided in Section 2.2.3;

(b) The Company shall have delivered the resignations of the directors of the Company effective as of the Closing Date;

(c) Agency shall have received such other documents and instruments as the Parties have mutually determined are necessary to effectuate the transactions contemplated hereby;

(d) The representations and warranties of Newhall and the Company contained in this Agreement and in all schedules, certificates and other documents delivered pursuant hereto or in connection with the transactions contemplated hereby, shall be true and correct in all material respects as of the date when made and at and as of the Closing Date with the same effect as though made on and as of such date, except for changes contemplated by this Agreement, and Newhall and the Company shall have performed, in all material respects, all of its obligations hereunder that are required to be performed on or before the Closing Date;

(e) Newhall shall have delivered or caused to be delivered to the Agency a non-foreign affidavit dated as of the Closing Date, sworn under penalty of perjury and in form and substance acceptable to the Agency stating that Newhall and each of its members is not a "foreign person" as defined in Code §1445;

(f) The Agency and SRV shall have executed the Pre-Annexation Agreement referred to in section 6.5 of this Agreement and the Deposit and Funding Agreement for annexation of the Legacy property.

7.2 Obligations of Agency at the Closing. The obligation of Newhall to transfer the Shares pursuant to this Agreement shall be subject to the satisfaction or waiver in writing by Newhall on or prior to the Closing Date of each of the following conditions:

- (a) Agency shall have delivered the Purchase Price as provided for herein;
- (b) Agency shall deliver to Newhall (i) a certificate of the Secretary of Agency, dated as of the Closing Date, certifying a copy of the resolutions of the Board of Directors of the Agency authorizing the execution and performance of this Agreement, the Ancillary Agreements, and all documents related thereto, and the incumbency of the respective official(s), and (ii) a certified copy of a signed and endorsed Stipulated Judgment in the form attached hereto as Exhibit B;
- (c) Newhall shall have received such other documents and instruments as the Parties have mutually agreed are necessary to effectuate the transactions contemplated hereby;
- (d) The representations and warranties of Agency contained in this Agreement and in all schedules, certificates and other documents delivered pursuant hereto or in connection with the transactions contemplated hereby, shall be true and correct in all material respects as of the date when made and at and as of the Closing Date respects with the same effect as though made on and as of such date, except for changes contemplated by this Agreement, and Agency shall have performed, in all material respects, all of its obligations hereunder that are required to be performed on or before the Closing Date.

7.3 Failure to Close. If, for any reason, the Closing does not take place on the earlier of three (3) business days after entry of the Stipulated Judgment or January 31, 2013, Newhall shall have the right, at any time thereafter, to terminate the transactions contemplated by this Agreement (the “**Termination Option**”) by providing to the Agency a written notice of the exercise of such Termination Option. Upon exercise of the Termination Option (a) this Agreement shall terminate as of the date of such notice and be of no further force and effect; (b) the Agency shall promptly dismiss the Condemnation Action (without prejudice) and rescind the Resolution of Necessity; and (c) the Agency, Company, and Newhall shall have no further obligations, rights, or benefits under this Agreement, the Stipulated Judgment, and the Resolution of Necessity. Except in the event of a breach of this Agreement, in the event of termination, neither party is entitled to costs, attorneys’ fees, or any other damages.

ARTICLE VIII

POST-CLOSING LITIGATION

Should a third party file litigation or an administrative complaint (collectively “**Action**”) challenging Agency’s rights to operate the Business or acquire or hold the Shares, the following provisions shall apply:

8.1 Agency shall, if Newhall is not named as a party, support any effort by Newhall to intervene or otherwise appear as a party in such Action. If Newhall is not named a party, Newhall will intervene or otherwise appear as a party in such Action upon reasonable request of the Agency. Newhall shall be solely responsible for any attorney's fees and costs associated with its participation in any Action as a party or an intervenor.

8.2 Except in the circumstance described in Section 5.4 of this Agreement where a regulatory or similar entity requires acquisition of an additional consent or approval of the Agency's acquisition of the Shares, Agency shall, at its sole expense, diligently defend the Action, including any appeal as an appellant or respondent, and Agency and Newhall (if it is a party) shall cooperate in the defense. If Newhall is not named a party, Newhall will intervene or otherwise appear as a party in such Action upon reasonable request of the Agency.

ARTICLE IX

INDEMNIFICATION

9.1 Subject to the limitations set forth in Section 9.3, to the fullest extent permitted by law, Newhall agrees to indemnify, defend (with counsel reasonably selected by the Agency) and hold harmless the Agency and the Agency-Related Parties for any Damages (as defined in Section 9.7) suffered by the Agency and/or the Agency-Related Parties that arises out of (i) the breach of any representation or warranty made by Newhall pursuant to Article III, to the extent any claim for any such Damages is made prior to the expiration of the applicable survivability period, and (ii) the breach of any post-closing covenant of Newhall contained in this Agreement, to the extent any claim for any such Damages is made prior to the expiration of the applicable survivability period.

9.2 To the fullest extent permitted by law, Agency agrees to indemnify, defend (with counsel reasonably selected by Newhall) and hold harmless Newhall and the Newhall-Related Parties for any Damages suffered by the Newhall and/or the Newhall-Related Parties that arises out of (i) the breach of any representation or warranty made by the Agency pursuant to Article IV, to the extent any claim for any such Damages is made prior to the expiration of the applicable survivability period, (ii) the breach of any post-closing covenant of the Agency contained in this Agreement, to the extent any claim for any such Damages is made prior to the expiration of the applicable survivability period, and (iii) the Company, the Shares, the Business, the Company Assets and/or the Company Liabilities (regardless of whether any claims for Damages arise out of events occurring before, on or after the Closing Date).

9.3 Notwithstanding any provision of this Agreement to the contrary, Newhall shall not have any obligation to indemnify, defend, or hold harmless the Agency or the Agency-Related Parties under this Article IX if (i) the claim is based on a condition or circumstance (including environmental conditions) described or deemed investigated by Agency in Section 4.5 of this Agreement, or (ii) the cumulative cost of all payments plus costs (including attorneys' fees) incurred with respect to such indemnification is equal to or less than (fifty thousand dollars) \$50,000 or has equaled or exceeded (one million dollars) \$1,000,000. Notwithstanding any provision of this Agreement to the contrary, Agency shall not have any obligation to indemnify, defend, or hold harmless Newhall or any other person for the breach of any representation or warranty made by Agency pursuant to Article IV, if the cumulative cost of all payments plus costs (including attorneys' fees) incurred with respect to such indemnification is equal to or less

than (fifty thousand dollars) \$50,000 or has equaled or exceeded (one million dollars) \$1,000,000.

9.4 Whenever any claim shall arise for indemnification hereunder, the party entitled to indemnification (the “**Indemnified Party**”) shall promptly notify the Party from whom indemnity may be sought under this Article IX (the “**Indemnifying Party**”) of the claim and, when known, the facts constituting the basis for such claim; provided, however, that the Indemnified Party’s failure to give such notice shall not affect any rights or remedies of such indemnified Party hereunder with respect to indemnification for Damages except to the extent that the Indemnifying Party is materially prejudiced thereby. In the event of any claim for indemnification hereunder resulting from or in connection with any claim or legal proceeding by a third party, the notice to the Indemnifying Party shall specify, if known, the amount or any estimate of the amount of the liability arising therefrom. Neither the Indemnified Party nor any Indemnifying Party shall settle or compromise any claim by a third party for which the Indemnified Party is entitled to indemnification hereunder, without the prior written consent of the other party (which shall not be unreasonably withheld), unless such claim shall have been instituted against the Indemnified Party and the Indemnifying Party shall not have accepted the tender of the defense of such claim after notification thereof as provided in Section 9.5 of this Agreement.

9.5 Agency shall, if it is the Indemnifying Party and may, if Newhall is the Indemnifying Party and fails to undertake the following or agrees to permit the Agency to undertake the following and the Agency so elects: (i) take control of the defense and investigation of such lawsuit or action; (ii) employ and engage attorneys of its own choice which are reasonably acceptable to the Indemnified Party, to handle and defend the same, at the Indemnifying Party’s cost, risk and expense; and (iii) compromise or settle such claim, which compromise or settlement shall be made only with the written consent of Newhall, which shall not be unreasonably withheld. If Agency has assumed the defense of any such claim or legal proceeding, Newhall (and the indemnified Party in other than Newhall) shall be entitled to participate in (but not control) the defense of any such action, with its counsel and at its own expense. Each Party agrees to cooperate fully with the other, such cooperation to include, without limitation, attendance at depositions and the provision of relevant documents as reasonably may be requested by the Indemnifying Party, provided that the Indemnifying Party will hold the Indemnified Party harmless from all of its reasonable expenses, including reasonable attorneys’ fees, as and when incurred in connection with such cooperation by the Indemnified Party.

9.6 Newhall shall, if it is the Indemnifying Party, and may, if the Agency is the Indemnifying Party and fails to undertake the following or agrees to permit Newhall to undertake the following and Newhall so elects: (i) take control of the defense and investigation of such lawsuit or action; (ii) employ and engage attorneys of its own choice which are reasonably acceptable to the Agency, if the Agency is the Indemnified Party, to handle and defend the same, at the Indemnifying Party’s cost, risk and expense; and (iii) compromise or settle such claim, which compromise or settlement shall be made only with the written consent of the Agency, which shall not be unreasonably withheld; provided, that if the Agency is an Indemnifying Party and the Agency has agreed to assume liability for any claim made against an Agency Board Member, the Agency shall have the right to take control of the defense and investigation of such

lawsuit or action. If a Board Member has assumed the defense of any such claim or legal proceeding, the Agency shall be entitled to participate in (but not control) the defense of any such action, with its counsel and at its own expense. Each party agrees to cooperate fully with the other, such cooperation to include, without limitation, attendance at depositions and the provision of relevant documents as reasonably may be requested by the Indemnifying Party, provided that the Indemnifying Party will hold the indemnified party harmless from all of its reasonable expenses, including reasonable attorneys' fees, as and when incurred in connection with such cooperation by the Indemnified Party.

9.7 "Damages." as used in this Article IX, shall mean: (x) demands, claims, actions, suits, investigations, and legal or other proceedings brought against any indemnified party or parties (as hereinbefore defined), and any judgments or assessments, fines or penalties rendered therein or any settlements thereof, and (y) all liabilities, damages, losses, taxes payable by the Company (whether incurred prior to or after the Closing Date), assessments, costs and expenses (including, without limitation, reasonable attorneys' and accountants' fees and expenses) incurred by any Indemnified Party or Parties, whether or not they have arisen from or were incurred in or as a result of any demand, claim, action, suit, assessment or other proceeding or any settlement or judgment, and whether sustained before or after the Closing Date. Solely for purposes of Section 9.2, "Damages" includes but is not limited to the Additional Taxes, if any, and excludes any other Taxes which may owed by a Shareholder (or any beneficial owner thereof) as a result of the sale of such Shares by the Shareholder to the Agency, and for purposes of Section 9.1, "Damages" shall not include the Additional Taxes.

ARTICLE X

NOTICES

All notices, requests, demands, or other communications hereunder shall be in writing and shall be deemed to have been duly given, if delivered in person or mailed, registered (and not certified), return receipt requested, postage prepaid or on confirmation of receipt if delivered by facsimile transmission; provided the original thereof is sent by mail, in the manner set forth above, within one business day after the original transmission:

(a) If to Newhall to:

The Newhall Land and Farming Company
25124 Springfield Court, Suite 300
Valencia, California 91355
Attention: President
Facsimile No.: (661) 255-3960

With copies to:

Kronick Moskovitz Tiedemann & Girard
400 Capitol Mall, 27th Floor
Sacramento, California 95814
Attention: Clifford W. Schulz
Facsimile No.: (916) 321-4555

And:

FivePoint Communities Management, Inc.
25 Enterprise, Suite 400
Aliso Viejo, California 92656-2601
Attention: Michael A. Alvarado Esq.,
General Counsel
Facsimile No.: (949) 349-1075

(b) If to Agency, addressed to:

Castaic Lake Water Agency
27234 Bouquet Canyon Road
Santa Clarita, California 91350
Attention: Dan Masnada, General Manager
Facsimile: (661) 297-1610

With a copy to:

Russell G. Behrens, General Counsel
Best Best & Krieger LLP
5 Park Plaza, Suite 1500
Irvine, CA 92614
Facsimile: (949) 260-0972

Douglas S. Brown, Special Counsel
Stradling Yocca Carlson & Rauth
660 Newport Center, Suite 1600
Newport Beach, CA 92660
Facsimile: (949) 823-5106

(c) If to Company, addressed to:

Valencia Water Company
24631 Ave. Rockefeller
Valencia CA 91355-3907
Attention: Keith Abercrombie

General Manager
Facsimile No.: (661) 294-3806

With a copy to:

Nossaman LLP
50 California Street, 34th Floor
San Francisco, California 94111
Attention: Martin A. Mattes
Facsimile No.: (415) 398-2438

Any party hereto may from time to time, by written notice to the other party, designate a different address, which shall be substituted for the one specified above for such party. If any notice or other document is sent by registered (and not certified) mail, return receipt requested, postage prepaid, properly addressed as aforementioned, the same shall be deemed served or delivered on the third business day following mailing thereof. If any notice is transmitted by facsimile machine ("fax") to a party, it will be deemed to have been delivered on the date the fax thereof is actually received, as indicated by an electronic confirmation of successful transmission, provided that an original or photocopy of the document sent is also mailed by registered (and not certified) mail, postage prepaid, to the address then applicable to such party within twenty-four (24) hours after such transmission.

ARTICLE XI

MISCELLANEOUS

11.1 California Environmental Quality Act ("CEQA"). Notwithstanding any provision in this Agreement, the Parties acknowledge and agree that Agency cannot and does not commit itself or agree that it can or will annex or provide water service to any particular project, as such annexation or the provision of such water service may require compliance with the California Environmental Quality Act. Newhall assumes the risk that annexations and related approvals may not be approved by Agency or other governmental agencies and that such agencies retain full discretion to consider and approve or deny such annexations, related approvals, or the provision of such water service.

11.2 Assignment. (a) Prior the Closing Date, Newhall, may not assign its rights or delegate its duties hereunder, without the written consent of the Agency; provided, however, if the Closing Date does not occur on or before January 31, 2013, and Newhall elects not to exercise the Termination Option provided to it by Section 7.3 of this Agreement (which election may be made or not made in Newhall's sole and absolute discretion), then at anytime after January 31, 2013, and until the actual Closing Date, Newhall shall have the right and obligation to assign its rights and delegate its duties under this Agreement, without the consent of the Agency, in connection with any asset sale that includes Legacy and all or substantially all of the Newhall Ranch Project, in which case Newhall shall require transferee to assume Newhall's rights and duties under this Agreement.

(b) Any time after the Closing Date, (i) Newhall shall assign its then-remaining rights and delegate its then remaining duties hereunder (other than its rights and duties in Sections 6.4 and 6.5) to any transferee of all or substantially all of the Newhall Ranch Project; and (ii) should SRV sell all or substantially all of Legacy to a third party not affiliated with Newhall, Newhall shall assign its rights and delegate its duties under Sections 6.4 and 6.5 to such transferee of Legacy. In addition, after the Closing Date, if Newhall sells or otherwise transfers fee title to portions (but not all or substantially all) of Newhall's properties located within the Agency service area, Newhall may assign its rights and delegate its duties under this Agreement in whole or in part, without the consent of the Agency, in connection with any such sale or transfer to the respective successor(s) in interest to such portions of Newhall's properties.

(c) Except as provided in Paragraphs (a) and (b), above, Newhall may not assign this Agreement, or assign the rights or delegate the duties hereunder except with the written consent of the Agency, which shall not be unreasonably withheld, conditioned or delayed. Newhall shall provide prompt written notice to Agency of any assignment made pursuant the terms of this Paragraph 11.2.

(d) Except for a successor public agency with the power to exercise wholesale and retail water supply functions for the Newhall Ranch, Legacy, and the Newhall's other properties located with the Agency's service area, Agency may not assign its rights or delegate its duties hereunder (in whole or in part), without the prior written consent of Newhall, which shall not be unreasonably withheld, conditioned or delayed.

11.3 Severability. If, after the Closing Date, any of the surviving provisions of Article VI of this Agreement are determined to be illegal, invalid or unenforceable, such provisions shall be ineffective to the extent of such illegality, invalidity or unenforceability, without affecting the remaining provisions hereof, unless and to the extent the rights and obligations or the benefits of the bargain of any Party have been materially altered or abridged by such illegality, invalidity or unenforceability, as determined by the Party who would have benefited. In such event, the Parties will meet and confer in a good faith effort to reach an agreement that will restore the benefits of the bargain established through this Agreement, and, in the absence of such agreement, any party may institute a Judicial Reference pursuant to Section 11.13 of this Agreement for the purpose of seeking a reformation of this Agreement which will carry out the original intent of the Parties.

11.4 Further Assurances. Each party hereto shall execute and deliver, both before and after the Closing, such instruments and take such other actions as the other party or parties, as the case may be, may reasonably request in order to carry out the intent of this Agreement or to better evidence or effectuate the transactions contemplated herein.

11.5 Governing Law. This Agreement is deemed to have been made in the State of California, and its interpretation, its construction and the remedies for its enforcement or breach are to be applied pursuant to, and in accordance with, the laws of California, without giving effect to any choice of law provisions.

11.6 Incorporation and Amendment. This Agreement, the Schedules and Exhibits hereto and each additional agreement and document referred to herein constitute the entire agreement of the Parties, superseding and extinguishing all prior agreements, understandings,

representations, and warranties relating to the subject matter hereof whether oral or written. This Agreement may not be modified, amended, or terminated except by written agreement specifically referring to this Agreement signed by Agency, Newhall, and the Company. The parties hereto agree that the terms of the stipulated judgment shall, to the extent inconsistent with the terms hereof, be controlling.

11.7 Waiver. No waiver of a breach or default hereunder shall be considered valid unless in writing and signed by the party giving such waiver, and no such waiver shall be deemed a waiver of any subsequent breach or default of the same or similar nature.

11.8 Headings. The section and paragraph headings contained herein are for ease of reference only and are not intended to define or limit the contents of such sections.

11.9 Interpretation. The use of the singular or plural form shall include the other form and the use of the masculine, feminine or neuter gender shall include the other genders. Each party hereto has participated (through their attorneys) in the drafting of this Agreement. Accordingly, no party shall have any provision of this Agreement strictly construed against it by reason of such party having drafted the provision in question.

11.10 Counterparts. This Agreement may be executed in multiple counterparts, each of which shall be deemed an original, but all of which together shall constitute one and the same instrument.

11.11 Attorneys' Fees. In the event of any controversy, claim, or dispute arising out of or relating to this Agreement, or breach hereof, the prevailing party shall be entitled to recover from the losing party reasonable attorneys' and expert witness fees, expenses and costs.

11.12 Successors. Subject to the limitation in Section 11.2 of this Agreement, this Agreement shall inure to the benefit of and shall be binding upon the parties hereto and their respective successors.

11.13 Judicial Reference. The Parties agree that any and all disputes, claims, and controversies of any nature (collectively, "**Claim**") among the Parties arising out of or relating to this Agreement, including the transactions and agreements contemplated thereby, shall be decided by a reference to a retired judge or justice, mutually selected by the Parties and appointed in accordance with California Code of Civil Procedure sections 638 through 645.1, inclusive, sitting without a jury, in Los Angeles County, California; provided, however, that the retired judge or justice is technically qualified as to the particular subject matter of the reference proceeding. If the Parties cannot agree within ten (10) days of a written request to do so by any party, then, upon request of any party, the Presiding Judge of the Los Angeles County Superior Court (or his or her representative) shall select the retired judge or justice that is technically qualified to hear and resolve the particular subject matter of the reference proceeding. A request for appointment of the retired judge or justice may be heard on an ex parte or expedited basis, and the Parties agree that irreparable harm would result if ex parte or expedited relief is not granted. Pursuant to Code of Civil Procedure section 170.6, the Parties hereto shall have one peremptory challenge to the retired judge or justice selected by the Presiding Judge (or his or her representative), and submit to the jurisdiction of such reference and court. The agreed upon or selected retired judge or justice shall have the power, among others, to grant specific

performance and provisional relief, including without limitation, entering temporary restraining orders, issuing preliminary and permanent injunctions, and appointing receivers. The judicial reference proceeding before the retired judge or justice shall adhere to the following:

(a) The proceeding shall be conducted in the same manner as it would be before a court under the rules of evidence applicable to judicial proceedings.

(b) The retired judge or justice shall determine the manner in which the reference proceeding is conducted, including, without limitation, the time and place of hearings, the order of presentation of evidence, and all other questions that arise with respect to the course of the reference proceedings.

(c) The Parties shall be entitled to discovery, which shall be conducted in the same manner as it would be before a court under the rules of discovery applicable to judicial proceedings; however, the retired judge or justice shall oversee and limit discovery as appropriate and may enforce all discovery rules and orders applicable to the reference proceeding in the same manner as a trial court judge.

(d) The retired judge or justice shall have the power to decide all issues in the action or proceeding, whether factual, legal, or equitable, and shall report a statement of decision thereon pursuant to California Code of Civil Procedure Section 644(a). The statement of decision shall include a determination of all questions submitted to the retired judge or justice. The statement of decision will stand as the decision of the court, and upon filing of the statement of decision with the clerk of the court, judgment may be entered thereon in the same manner as if the action or proceeding had been tried by the court.

(e) The Parties agree that time is of the essence in conducting the reference proceeding. Accordingly, the retired judge or justice shall, subject to change in the time periods specified herein for good cause shown: (i) set the matter for a status and trial-setting conference (the "**Conference**") within fifteen (15) days after the date of selection of the retired judge or justice; (ii) if practicable, hear all issues submitted within one hundred twenty (120) days after the date of the Conference; and (iii) report a statement of decision within twenty (20) days after the matter has been submitted for decision.

(f) The Parties hereto reserve the right to appeal from the final judgment or order or from any appealable decision or order entered by the retired judge or justice. The Parties reserve the right to move for a new trial or a different judgment, which new trial, if granted, is also to be a reference proceeding under this Section 11.13.

(g) If a Claim subject to this Agreement also includes other claims or parties, which are found not subject to this Agreement, the Parties hereto shall stay the proceedings relating to those other claims or parties until the Claim arising out of or relating to this Agreement is resolved in accordance with this Section 11.13. The retired judge or justice shall have the power to stay such other claims, sever non-parties, and first resolve the Claim subject to this Agreement.

(h) During the pendency of any Claim submitted to judicial reference in accordance with this Agreement, each of the Parties to such Claim shall bear equal shares of the

fees charged and costs incurred by the retired judge or justice in performing the services described in this Section 11.13. Compensation of the retired judge or justice shall not exceed the prevailing rate for like services. The prevailing party shall be entitled to reasonable court costs and legal fees, including customary attorney fees, expert witness fees, legal assistant fees, fees of the referee, and other reasonable costs and disbursements charged to the party by its counsel, in such amount as is determined by the retired judge or justice.

(i) The retired judge or justice shall also determine all issues relating to the applicability, interpretation, and enforceability of this Section 11.13.

11.14 Third Party Beneficiaries. This Agreement does not create, and shall not be construed to create, any rights enforceable by any person, partnership, corporation, joint venture, limited liability company or other form of organization or association of any kind that is not a party to this Agreement; provided, that any affiliate of Newhall shall be deemed a third party beneficiary of this Agreement and shall be entitled to enforce its provisions as if it were a party hereto in the event of a breach affecting such affiliate.

11.15 Survival

(a.) All of the representations and warranties of Newhall set forth in Articles III and IV of this Agreement (other than the representations and warranties set forth in Section 3.1.21) and of the Agency set forth in Article IV of this Agreement shall remain in full force and effect until the date that is the one-year anniversary of the Closing Date (the “**Expiration Date**”). No claim for a breach of any such representation or warranty of any Party will be actionable or payable if (i) the other Party does not notify the breaching Party in writing of such breach and file an action in the appropriate court prior to the Expiration Date, or (ii) the breach in question results from or is based on a condition, fact or other matter known to such other Party prior to the Closing Date. All of the representations and warranties of Newhall set forth in Section 3.1.21 shall remain in full force and effect until the date that is the three-year anniversary of the Closing Date (the “**Tax Expiration Date**”). No claim for a breach of any such representation or warranty of Newhall will be actionable or payable if the Agency does not notify Newhall in writing of such breach and file an action in the appropriate court prior to the Tax Expiration Date.

(b.) Sections 2.2(c), 5.2, 5.3, 5.4, 5.5, all provisions of Articles VI, VIII, and XI, with the exception of Section 6.6, shall survive the Closing.

(c.) The indemnities and other obligations of the Parties in Article IX shall survive the Closing.

11.16 Nonrecourse Nature of this Agreement. No direct or indirect partner, member, manager, shareholder, officer, director, trustee or beneficiary of Newhall, the Company, or the Agency (collectively, the “**Nonrecourse Parties**”) shall be personally liable in any manner or to any extent under or in connection with this Agreement, and Newhall and the Agency, as the case may be, shall not have any recourse to any assets of any of the Nonrecourse Parties to satisfy any liability, judgment or claim that may be obtained or made against any such Nonrecourse Party under this Agreement. The limitation of liability provided in this Section 11.16 is in addition to,

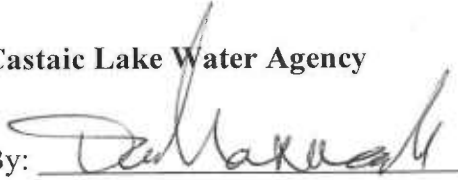
and not in limitation of, any limitation on liability applicable to any Nonrecourse Parties provided by law or by this Agreement or any other contract, agreement or instrument.

11.17 Specific Performance. The Parties acknowledge and agree that the subject matter of this Agreement involves unique assets, that damages for breach likely are substantial, but may not be readily compensable in monetary damages, and that, therefore, in addition to any other remedies available to Newhall or its affiliates at law or in equity, in the event of breach, or a threatened breach, of this Agreement, Newhall shall be entitled to specific performance of this Agreement and neither Agency nor the Company shall contend otherwise.

IN WITNESS WHEREOF, the undersigned Parties have caused this Settlement Agreement to be executed by officers or other persons thereunto duly authorized, and the individuals have executed this Settlement Agreement, on the date first above stated.

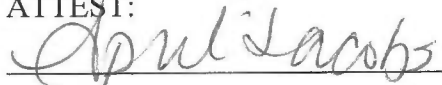
Date: December 17, 2012

Castaic Lake Water Agency

By: 

Dan Masnada, General Manager

ATTEST:



April Jacobs, Secretary

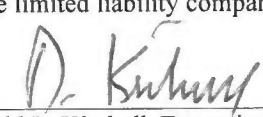
**The Newhall Land and Farming Company,
a California limited partnership**

By: NWHL GP LLC, a Delaware limited liability company, its General Partner

By: LandSource Holding Company, LLC, a Delaware limited liability company, its Sole Member

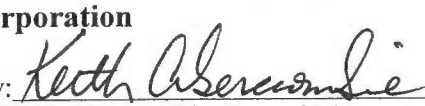
By: Newhall Land Development, LLC, a Delaware limited liability company, its Sole Member

By: Newhall Holding Company, LLC, a Delaware limited liability company, its Manager

By: 

Donald L. Kimball, Executive Vice President

Valencia Water Company, a California corporation

By: 

Keith Abercrombie, General Manager

Minutes of the Special Meeting of the Board of Directors of the Castaic Lake Water Agency –
December 10, 2012

A special meeting of the Board of Directors of the Castaic Lake Water Agency was held at Castaic Lake Water Agency, 27234 Bouquet Canyon Road, Santa Clarita, CA 91350, at 6:15 PM on Monday, December 10, 2012. A copy of the agenda is inserted in the Minute Book of the Agency preceding these minutes.

DIRECTORS PRESENT: Directors B. J. Atkins (arrived at 6:26 PM), Tom Campbell, Ed Colley, William Cooper, Dean Efstathiou, Jerry Gladbach, Peter Kavounas, R. J. Kelly, Jacque McMillan (arrived at 6:17 PM) and Bill Pecsí were in attendance.

DIRECTORS ABSENT: None

Also present: Dan Masnada, General Manager; Russ Behrens, General Counsel; April Jacobs, Board Secretary; Brian Folsom, Engineering and Operations Manager; Mauricio Guardado, Retail Manager; Dirk Marks, Water Resources Manager; Valerie Pryor, Administrative Services Manager; Doug Brown, Stradling Yocca Carlson & Rauth; Lynn Takaichi, Kennedy/Jenks Consultants; Hunt Braly; Maria Gutzeit, Newhall County Water District; and no members of the public were present.

President Campbell called the meeting to order at 6:15 PM. A quorum was present.

Upon motion of Director Gladbach, seconded by Director Colley and carried, the Agenda was approved. (Item 1.4)

Upon motion of Director Kelly, seconded by Director Pecsí and carried, the Board went into Closed Session at 6:18 PM to discuss the item listed on the agenda. (Item 2)

Upon motion of Director Gladbach, seconded by Director Kelly and carried, the Board voted to come out of Closed Session at 8:37 PM.

President Campbell reconvened the Open Session at 8:37 PM.

Russ Behrens, Esq. announced that there was no action taken in Closed Session that is reportable under the Ralph M. Brown Act. (Item 3)

Upon motion of Director Gladbach, seconded by Director McMillan and unanimously carried, the meeting was adjourned at 8:38 PM. (Item 4)

April Jacobs, Board Secretary

ATTEST:

President of the Board

Minutes of the Special Meeting of the Board of Directors of the Castaic Lake Water Agency –
December 12, 2012

A special meeting of the Board of Directors of the Castaic Lake Water Agency was held at Castaic Lake Water Agency, 27234 Bouquet Canyon Road, Santa Clarita, CA 91350, at 6:15 PM on Wednesday, December 12, 2012. A copy of the agenda is inserted in the Minute Book of the Agency preceding these minutes.

DIRECTORS PRESENT: Directors B. J. Atkins, Tom Campbell, Ed Colley, William Cooper, Dean Efstathiou, Jerry Gladbach, Peter Kavounas, R. J. Kelly, Jacque McMillan (left at 8:30 PM) and Bill Pecsí were in attendance.

DIRECTORS ABSENT: None

Also present: Dan Masnada, General Manager; Russ Behrens, General Counsel; April Jacobs, Board Secretary; Brian Folsom, Engineering and Operations Manager; Mauricio Guardado, Retail Manager; Dirk Marks, Water Resources Manager; Valerie Pryor, Administrative Services Manager; Doug Brown, Stradling Yocca Carlson & Rauth; Lynn Takaichi, Kennedy/Jenks Consultants; Hunt Braly; Robert Porr, Fieldman Rolapp & Associates; Doug Evertz, Murphy & Evertz; Ken Pulkamp; and members of staff and the public.

President Campbell called the meeting to order at 6:18 PM. A quorum was present.

Upon motion of Director Gladbach, seconded by Director Kelly and carried, the Board approved the agenda. (Item 1.4)

President Campbell, Directors and Staff recognized Kenneth Pulkamp for his distinguished service in the Santa Clarita Valley. (Item 2.1)

A presentation was given by staff and the consultants regarding the consideration of approval of adoption of a Resolution of Necessity Authorizing and Directing the Condemnation of a All Issued and Outstanding Capital Stock of the Valencia Water Company, and Declaring the Public Necessity Therefore and Hearing Thereon Castaic Lake Water Agency v. Newhall Land and Farming Company, a California Limited Partnership. The Board and public were then given the opportunity to make comments concerning the proposed action. The Board of Directors and members of the public made comments. Letters of support and opposition were filed to be included in the comments.

Director Colley made a motion to adopt Resolution No. 2890 subject to striking the word "hearing" and inserting the word "meeting" in the 6th Recital of the Resolution. Director Colley's motion was seconded by Director Gladbach. The President requested the Secretary to conduct a roll call vote of the Board. Pursuant to the roll call vote set forth below, the Board approved Resolution No. 2890, A Resolution of the Castaic Lake Water Agency Authorizing and Directing the Condemnation of All Issued and Outstanding Capital Stock of the Valencia Water Company, and Declaring the Public Necessity Therefore. (Item 2.2)

A roll call vote was taken:

Director Efstathiou	Yes	Director Gladbach	Yes
Director Kelly	Yes	Director McMillan	Yes
Director Pecs	Yes	Director Kavounas	Yes
Director Atkins	No	Director Colley	Yes
Vice President Cooper	Yes	President Campbell	Yes

RESOLUTION NO. 2890

A RESOLUTION OF THE CASTAIC LAKE WATER AGENCY AUTHORIZING AND DIRECTING THE CONDEMNATION OF ALL ISSUED AND OUTSTANDING CAPITAL STOCK OF THE VALENCIA WATER COMPANY, AND DECLARING THE PUBLIC NECESSITY THEREFORE

WHEREAS, the Castaic Lake Water Agency (Agency) is a special district formed, existing and exercising its powers and purposes pursuant to the Castaic Lake Water Agency Law, Water Code Appendix Section 103-1 *et seq.*, and is authorized to take properties by condemnation and to hold, use and enjoy such properties as necessary to fully exercise its powers; and

WHEREAS, the Valencia Water Company, a California corporation (VWC) is an investor-owned public utility subject to the jurisdiction of the Public Utilities Commission of the State of California. VWC is a retail water purveyor providing water service in the County of Los Angeles, State of California; and

WHEREAS, The Newhall Land and Farming Company, a California limited partnership (Newhall), is the sole shareholder of VWC; and

WHEREAS, the Agency is specifically authorized by virtue of, *inter alia*, Article 1, Section 19, of the California Constitution, Article 16, Section 17, of the California Constitution, Water Code Appendix Section 103-15, Section 1230.010, *et seq.* of the California Code of Civil Procedure, including, without limitation, Sections 1240.010, 1240.110, 1240.120 and 1240.610, and other applicable law, to exercise the right of eminent domain to take any property or interests in property necessary to carry out the business of the Agency by condemnation; and

WHEREAS, on December 11, 2012, and pursuant to Government Code Section 7267.2, the Agency submitted to Newhall an Offer to Purchase all issued and outstanding shares of common stock of VWC (Shares). The Agency offered to buy the Shares for the purpose of, among other things, (1) maintaining and enhancing the reliability of retail and wholesale water service in the Agency's boundaries; (2) developing more uniform water service policies within the Santa Clarita Valley; (3) better coordinating groundwater management activities and enhancing Valley wide conjunctive use of all sources of supply; (4) providing potential future opportunities for operational efficiencies and capital improvement economies of scale and (5) ensuring continuity in the ongoing critical perchlorate contamination clean-up efforts in the Santa Clara River Valley Groundwater Basin, Eastern Subbasin (Project).

WHEREAS, a public meeting was held by the Agency on December 12, 2012, at which the matters set forth in Code of Civil Procedure Section 1240.030 were discussed, including the following matters:

- a) Whether the public interest and necessity require the Project; and
- b) Whether the Project is planned and located in the manner that would be most compatible with the greatest public good and the least private injury; and
- c) Whether the Shares sought to be acquired (which are described herein) are necessary for the Project; and
- d) Whether any offer required by Section 7267.2 of the Government Code has been made to the owner or owners of record; and

WHEREAS, the Agency has provided all persons a reasonable opportunity to appear and be heard on those matters referred to in Code of Civil Procedure Section 1240.030; and

WHEREAS, Newhall has waived the right to receive notice of the hearing on the resolution of necessity and right to be heard, as required by Code of Civil Procedure Section 1245.235; and

WHEREAS, at such hearing, information on the Project and the matters set forth in this resolution were presented to the Agency by the Agency staff, including a detailed Staff Report of the purpose and necessity of the Project. The Staff Report is attached hereto as Exhibit "A" and incorporated herein by reference; and

WHEREAS, the acquisition of the Shares is not a "project" as the term is defined by State CEQA guidelines (Pub. Res. Code, § 21000 *et seq.*), the Board of Directors of the Agency finds no substantial evidence to support an argument that the acquisition of the Shares would have a direct or reasonably foreseeable indirect impact on the environment, and the Agency's acquisition of the Shares is excluded pursuant to State CEQA Guidelines Section 15378, the Agency will file a Notice of Exemption (Pub. Res. Code, §§ 21108, 21152 *et seq.*; 14 C.C.R. § 15000 *et seq.*)

NOW, THEREFORE, BE IT RESOLVED, the Agency hereby declares, finds, and determines as follows:

1. The public interest and necessity require the acquisition of all issued and outstanding shares of common stock of VWC. The Board of Directors of the Agency finds that the acquisition of the Shares is necessary to advance the business and statutory purposes of the Agency, including, but not limited to, (1) maintaining and enhancing the reliability of retail and wholesale water service in the Agency's boundaries; (2) developing more uniform water service policies within the Santa Clarita Valley; (3) better coordinating groundwater management activities and enhancing Valley wide conjunctive use of all sources of supply; (4) providing potential future opportunities for operational efficiencies and capital improvement economies of scale and (5) ensuring continuity in the ongoing critical perchlorate contamination clean-up efforts in the Santa Clara River Valley Groundwater Basin, Eastern Subbasin.

2. The public interest and necessity require the acquisition and taking of the Shares and ownership of VWC for water service and related purposes, which uses are public uses authorized by law. Water Code Appendix Section 103-15 permits and empowers this

acquisition by the Agency through its exercise of the power of eminent domain for the stated public use.

3. A list of all Shareholders of the Company, together with the Certificate Numbers of the Shares to be acquired, is attached hereto as Exhibit "B" and incorporated herein by reference.

4. The offer required by Government Code Section 7267.2 together with the accompanying statement of, and summary of the basis for, the amount established as just compensation, was made to owners of the Shares.

5. The Project as described herein will result in a number of benefits to all water users in the Agency's service area, including, but not limited to, (1) maintaining and enhancing the reliability of retail and wholesale water service in the Agency's boundaries; (2) developing more uniform water service policies within the Santa Clarita Valley; (3) better coordinating groundwater management activities and enhancing Valley wide conjunctive use of all sources of supply; (4) providing potential future opportunities for operational efficiencies and capital improvement economies of scale and (5) ensuring continuity in the ongoing critical perchlorate contamination clean-up efforts in the Santa Clara River Valley Groundwater Basin, Eastern Subbasin.

6. The taking and acquiring by the Agency of the Shares described herein is deemed necessary for the Agency to advance its statutory purposes of, among other things, providing efficient, reliable and quality water services, and the Project is planned and located in a manner most compatible with the greatest public good and the least private injury.

7. The Agency's use is a more necessary public use than the use to which VWC's Shares are now appropriated. Such acquisitions are made pursuant to the powers conferred by Code of Civil Procedure Section 1240.610.

8. All conditions and statutory requirements necessary to exercise the power of eminent domain to acquire the Shares described herein have been complied with by the Agency.

9. The Agency authorizes and ratifies any and all prior actions and activities of the members of its board of directors, Agency staff and consultants relating the acquisition of the Shares, including, but not limited to, compliance with Agency notices, administrative and legal procedures, expenditure of Agency funds, any and all discussions, negotiations, or other activities with or concerning Valencia Water Company, The Newhall Land and Farming Company, and any representatives of Valencia Water Company and the Newhall Land and Farming Company. The Agency deems all such actions and activities compliant with all provisions of Water Code Appendix Section 103-1 *et seq* and Agency procedures, policies and customary business practices.

10. The law firms of Best Best & Krieger LLP, and Murphy & Evertz LLP are authorized, empowered and directed to prepare, commence and prosecute an eminent domain action or actions in the Superior Court of the State of California in and for the County of Los Angeles in the name and on behalf of the Agency against all owners and persons and entities claiming or having interests in the above described Shares, for the purpose of performing and carrying out all proceedings and steps incident to the condemnation and the acquisition of the

Shares.

11. The General Manager of the Agency is authorized and empowered to execute any documents for the purpose of performing and carrying out all steps incident to the condemnation and the acquisition of the Shares, without further Agency approval, so long as the acquisition of the Shares of VWC is for the price set forth in the offer referred to in Paragraph 4 above.

Upon motion of Director McMillan, seconded by Director Gladbach and carried, the Board went into Closed Session at 8:30 AM to discuss the item listed on the agenda. (Item 3.1)

Upon motion of Director Kelly, seconded by Director Gladbach and carried, the Board voted to come out of Closed Session at 10:00 PM.

President Campbell reconvened the Open Session at 10:00 PM.

Russ Behrens, Esq. announced that there was no action taken in Closed Session that is reportable under the Ralph M. Brown Act. (Item 4)

Upon motion of Director Gladbach, seconded by Director Kavounas and carried the Consent Calendar was approved including Resolution No. 2891 and 2892. (Item 5.1, 5.2, 5.3, 5.4, 5.5, 5.6, 5.7, and 5.8)

RESOLUTION NO. 2891

RESOLUTION OF THE BOARD OF DIRECTORS OF THE CASTAIC LAKE WATER AGENCY APPROVING THE REVISED MISCELLANEOUS FEES

WHEREAS, on November 12, 2008, the Castaic Lake Water Agency (CLWA) Board of Directors approved the selection of Camp Dresser & McKee Inc. (CDM), to prepare a Comprehensive Water Rate Report and Impact/Capacity Fee Analysis for Santa Clarita Water Division (SCWD). CDM concluded its analysis of the water rate increases, which includes Miscellaneous Fees, and presented its findings to the CLWA Board of Directors on July 8, 2009. The CLWA Board of Directors approved a Resolution for Miscellaneous Fee Increases on November 10, 2009; and

WHEREAS, staff implemented the new Termination-Shut Off Notice procedures replacing the existing Door Hanger/Shut off notice procedures on the Miscellaneous Fees. The Miscellaneous Fees schedule requires updating to include the correct fee description due to the change above and also update the descriptions to accommodate the Utility Billing/Customer Information System software implementation. The overall rates in the Miscellaneous Fees remain the same; only the descriptions are changed; and

WHEREAS, the CLWA's Board of Directors desires to comply with the American Water Works Association and California Water Code requirements promulgated under AB 1600; and

WHEREAS, Miscellaneous Fees would have the same overall rates.

NOW, THEREFORE, BE IT RESOLVED that the Board of Directors hereby adopts and directs SCWD staff to implement the Miscellaneous Fees schedule as attached.

RESOLUTION NO. 2892

**RESOLUTION OF THE CASTAIC LAKE WATER AGENCY
BOARD OF DIRECTORS TO AWARD CONTRACTS
FOR ON-CALL ENGINEERING SERVICES**

WHEREAS, all Statement of Qualifications (SOQs) submitted to the Santa Clarita Water Division (SCWD) pursuant to SCWD's Request for SOQs for the Professional Services Agreement (PSA) were received at SCWD on November 5, 2012, in full accordance with the law and SCWD's customary procedures; and

WHEREAS, this Board finds, after considering the evaluation from staff, that Cannon Corp., Civiltec Engineering, Inc., Kennedy/Jenks Consultants, RBF Consulting and Willdan Engineering substantially meet the requirements of the specifications.

WHEREAS, it is in SCWD's best interest that the Agency's Board of Directors authorize its Retail Manager to execute PSA's with these firms for tasks not greater than \$250,000.

NOW, THEREFORE, BE IT RESOLVED that the Agency's Board of Directors does hereby authorize its Retail Manager to execute PSA's with Cannon Corp., Civiltec Engineering, Inc., Kennedy/Jenks Consultants, RBF Consulting and Willdan Engineering for water distribution, pumping, treatment, resources and support facilities.

RESOLVED FURTHER that SCWD's Retail Manager is thereafter authorized to execute and forward PSA's to Cannon Corp., Civiltec Engineering, Inc., Kennedy/Jenks Consultants, RBF Consulting and Willdan Engineering.

Upon motion of Director Gladbach, seconded by Director Kelly and carried, the meeting was adjourned at 10:02 PM. (Item 7)

April Jacobs, Board Secretary

ATTEST:

President of the Board

From: Irene Baca <ireneBaca55@gmail.com>
Sent: Friday, February 7, 2025 7:31 AM
To: DRP Subdivisions <subdivisions@planning.lacounty.gov>
Subject: Valencia Commerce Center Project no. 87-150-(5)

CAUTION: External Email. Proceed Responsibly.

Attn: Jodie Sackett

I am not in favor of this project. Our infrastructure can not handle any more buildings, commercial or non, nor for that matter, more traffic.

Thank you

Irene Baca

February 6, 2025

From: R <ryanzaman@yahoo.com>
Sent: Thursday, January 9, 2025 8:07 AM
To: DRP Subdivisions <subdivisions@planning.lacounty.gov>
Subject: entrada south project 00-210-5

CAUTION: External Email. Proceed Responsibly.

Hello Jodie

I am one of the neighbors to this project and looking to see if we can find more information on it?

Thanks

Ryan Zaman