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# **Appendix O**

## Response to Comments



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# Appendix O

# Response to Comments

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**MARCH 2023**

*Prepared for:*

**CITY OF OCEANSIDE**

300 N. Coast Highway  
Oceanside, California 92054  
*Contact: Sergio Madera*

*Prepared by:*

**DUDEK**

605 Third Street  
Encinitas, California 92024  
*Contact: Vanessa Scheidel*



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# 1 Responses to Comment Letters Received on the Draft EIR

The Draft Environmental Impact Report (EIR) was circulated for public review from October 30, 2022, through December 14, 2022, in accordance with Section 15105(a) of the California Environmental Quality Act (CEQA) Guidelines. A total of eight written comment letters were received on the Draft EIR from agencies, organizations, and individuals as identified in Table 1. Each of the written comment letters have been assigned an alphanumeric label, and the individual comments within each written comment letter are bracketed and numbered. For example, Comment Letter A1 contains one comment that is numbered A1-1.

The responses to each comment on the Draft EIR represent a good-faith, reasoned effort to address the environmental issues identified by the comments. Pursuant to CEQA Guidelines Section 15088(a), the City of Oceanside (City), as lead agency, is not required to respond to all comments on the Draft EIR, but only those comments that raise environmental issues. In accordance with CEQA Guidelines Sections 15088 and 15204, the City has independently evaluated the comments and prepared the attached written responses to any significant environmental issues raised.

**Table 1. Comment letters and Commenters**

Comment Letter	Commenter	Date Received
<b>Agency</b>		
A1	U.S. Fish and Wildlife Service	December 19, 2022
A2	California Department of Fish and Wildlife	December 14, 2022
A3	California Department of Transportation	December 14, 2022
A4	Vista Irrigation District	November 1, 2022
<b>Organizations</b>		
O1	Buena Vista Audubon Society	November 5, 2022
O2	Supporters Alliance for Environmental Responsibility	December 12, 2022
O3	Southwest Mountain States Regional Council of Carpenters	December 14, 2022
O4	Preserve Calavera	December 14, 2022

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## Response to Comment Letter A1

Agency  
U.S. Fish and Wildlife Service (USFWS)  
December 19, 2022

- A1-1** The comment provides an introduction to comments that follow, an explanation of USFWS's interest in the project, and a summary of the project description. The comment does not raise any specific issues related to the adequacy of the Draft EIR, and no further response is required.
- A1-2** The comment provides some background information about thread-leaved brodiaea and requests a copy of the survey report. A stand-alone report was not prepared; the methods and results are provided in the Biological Technical Report for the Modera Melrose Project, which was provided as Appendix C to the Draft EIR.

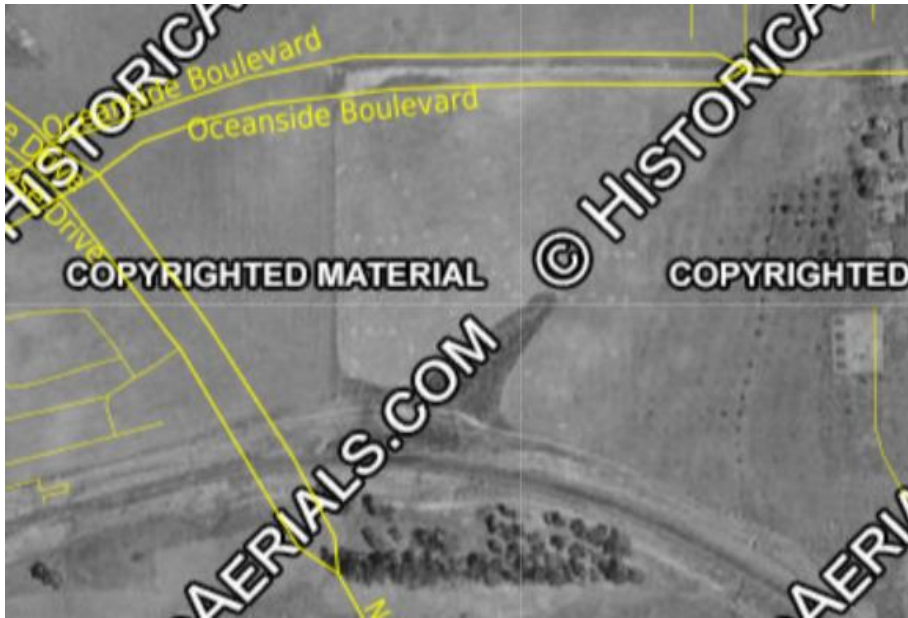
The locations of the reference sites are not disclosed in the Biological Technical Report due to the sensitive resources; the reference sites are located at 33.139633, -117.194537 and 33.136039, -117.199094; thread-leaved brodiaea was observed at both reference sites. A photo of thread-leaved brodiaea from Erin Bergman taken on June 6, 2022, can be found at <https://www.instagram.com/p/Cee6VTRPHgX/>.

Copies of the historic imagery reviewed are provided below, identified by date.

### *1938 – Cleared Land*



*1953 – Cleared Land*



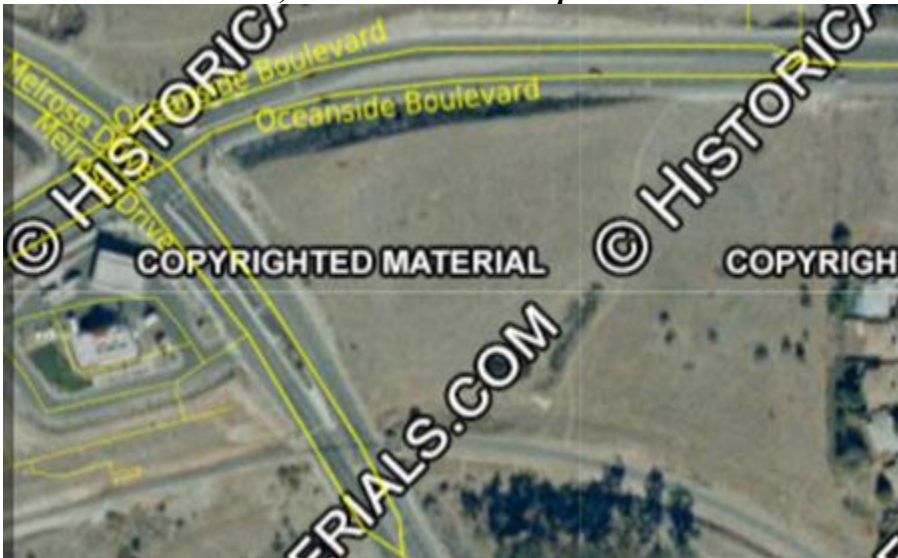
*1980 – Cleared Land*



*1990 – Cleared Land; Oceanside Boulevard and Melrose Drive Built*



*2000 – Cleared Land; Some Shrub Development*



*2010 – Cleared Land; Some Shrub Development*



*2018 – Cleared Land; Some Shrub Development*



**2020 – Cleared Land; More Shrub Development Post Melrose Drive Widening**



- A1-3** The comment requests more information regarding the disturbed Diegan coastal sage scrub. This vegetation community is described in Section 5.1.1 of the Biological Technical Report, which has been updated to include percent covers and provide a correction in the description: “Disturbed Diegan coastal sage scrub is dominated by approximately 10%–25% cover of native shrubs, such as coyotebrush (*Baccharis pilularis*), California brittle bush (*Encelia californica*), and interspersed California buckwheat (*Eriogonum fasciculatum*); and 25%–50% cover of non-native grasses/herbs such as red brome (*Bromus rubens*) and black mustard (*Brassica nigra*). The Diegan coastal sage scrub habitat onsite is disturbed with non-native grasses, historical mowing or grading, soil erosion, and soil disturbance. The Diegan coastal sage scrub is in small patches and surrounded by urban development.”
- A1-4** The comment includes concluding remarks. The comment does not raise any specific environmental issues related to the adequacy of the Draft EIR, and no further response is required.

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United States Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
Ecological Services
Carlsbad Fish and Wildlife Office
2177 Salk Avenue, Suite 250
Carlsbad, California 92008



In Reply Refer to:
22-0018746-CEQA-SD

December 19, 2022
Sent Electronically

Patty Anders
Planning Consultant
Development Services Department
City of Oceanside
300 North Coast Highway
Oceanside, California 92057

Subject: Comments on the Draft Environmental Impact Report for the Modera Melrose Project, City of Oceanside, San Diego County, California

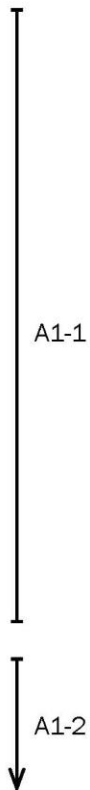
Dear Patty Anders:

The U.S. Fish and Wildlife Service (Service) has reviewed the draft Environmental Impact Report (DEIR) for the Modera Melrose Project (project), in the City of Oceanside (City), California. We appreciate the week extension the City granted the Service. We previously commented on the Notice of Preparation (NOP) for this project in our letter dated March 30, 2022 (FWS-SD-2022-0018746). Our comments and recommendations are based on the information provided in the DEIR, our knowledge of sensitive and declining vegetation communities in San Diego County, our participation in the Multiple Habitat Conservation Program (MHCP), and the City's draft MHCP Subarea Plan (SAP).

The primary concern and mandate of the Service is the protection of public fish and wildlife resources and their habitats. The Service has legal responsibility for the welfare of migratory birds, anadromous fish, and threatened and endangered animals and plants occurring in the United States. The Service is also responsible for administering the Federal Endangered Species Act of 1973 (Act), as amended (16 U.S.C. 1531 et seq.), including habitat conservation plans developed under section 10(a)(1) of the Act.

The proposed 7.4-acre project site consists of two vacant parcels located at the southeast corner of the intersection of Melrose Drive and Bobier Drive in the eastern portion of the City and is surrounded by existing development. The proposed project includes development of 320 residential apartment units on the project site.

As stated in our NOP comment letter, the federally and state threatened thread-leaved brodiaea (Brodiaea filifolia; brodiaea) is known to occur in clay or semi-sandy soils in the vicinity of the project site, which also has soils that may support this species (Web Soil Survey 2022). We appreciate that a focused brodiaea survey was conducted per our recommendation, which



Patty Anders (2022-0018746-CEQA-SD)

2

the DEIR states was negative. Please provide a copy of this survey, including any reference sites used. Additionally, historic topographic maps and aerial images from 1938 to 2018 were reviewed and reported to show multiple grading events of the project site, which may have impacted brodiaea. Please provide a copy of the reviewed historic topographic maps and aerial images.

↑  
A1-2  
Cont.

The DEIR states that 0.49 acre of disturbed Diegan coastal sage scrub occurs in the western portion of the property. Please provide the percent cover of native and non-native vegetation used to determine this disturbed classification. Aerial images appear to show a larger coastal sage scrub area in this portion of the property (Google Earth Pro 2021). Please provide more information into how the area of disturbed Diegan coastal sage scrub was decided. We also request a site visit to review vegetation mapping of the project site.

↑  
A1-3

We appreciate the opportunity to comment on this DEIR. If you have any questions regarding our comments, please contact [Taylor Curtis](mailto:Taylor_Curtis@fws.gov)<sup>1</sup> at 760-431-9440, extension 371.

Sincerely,  
DAVID  
ZOUTENDYK  
for Jonathan D. Snyder  
Assistant Field Supervisor

Digitally signed by  
DAVID ZOUTENDYK  
Date: 2022.12.19  
14:44:30 -08'00'

↑  
A1-4

**LITERATURE CITED**

Google Earth Pro. 2021. *Southeast corner of Oceanside Boulevard and Bobier Drive.* 33°13'14.24"N 117°15'29.37"W. Eye alt 1131ft. <http://www.google.com/earth/index.html>. Version 7.3.6.9285. Accessed 1 December 2022.

Web Soil Surveys. 2022. [www.WebSoilSurveys.ncrs.usda.gov](http://www.WebSoilSurveys.ncrs.usda.gov). Accessed 1 December 2022.

<sup>1</sup> Taylor\_Curtis@fws.gov.

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## Response to Comment Letter A2

Agency  
California Department of Fish and Wildlife (CDFW)  
December 14, 2022

- A2-1** The comment provides an introduction to comments that follow. The comment does not raise any specific issues related to the adequacy of the Draft EIR, and no further response is required.
- A2-2** The comment provides an introduction to CDFW's role as a state agency and its function. The comment does not raise any specific issues related to the adequacy of the Draft EIR, and no further response is required.
- A2-3** The comment provides a summary of the project description and project location. The comment does not raise any specific issues related to the adequacy of the Draft EIR, and no further response is required.
- A2-4** The comment recommends that the mitigation ratio for Diegan coastal sage scrub be 2:1 rather than the proposed 1:1 mitigation ratio. The site has been historically used for agricultural purposes and has been cleared since at least 1938 (see Response to Comment A1-2). Review of historical aerial imagery indicates some shrubs began to grow along the northern edge of the site after 2000 and along the west-central area in 2020 after re-seeding of disturbed areas was completed related to the road widening and associated disturbance. The site has not historically supported Diegan coastal sage scrub, and the vegetation community on site is highly disturbed by the presence of non-native grasses and herbs and relatively low native shrub cover. However, the Biological Technical Report, included as Appendix C to the Draft and Final EIR, has been updated to include a 2:1 mitigation ratio for impacts to Diegan coastal sage scrub, increasing the mitigation to 0.98 acres for impacts to 0.49 acres of Diegan coastal sage scrub. Revisions are shown in ~~strikeout~~/underline in Appendix C to the Final EIR and in the Biological Resources section (Section 4.3 of the Final EIR).
- Additionally, the mitigation will be at an approved mitigation bank that provides high quality preservation of intact coastal sage scrub, providing much greater habitat than what exists on site, which does not support any special-status species.
- A2-5** The comment states that the Draft EIR fails to propose mitigation for disturbed habitat. There is a long history of disturbance on the site from dirt roads and disturbance related to the installation of the Inland Rail Trail bicycle path and the City-approved and permitted road widening of Melrose Drive and Oceanside Boulevard with associated staging/stock piling on site. Since the City does not require mitigation for disturbed habitat (Table 5-2 of the Subarea Plan), there is no mitigation proposed for the 1.67 acres of disturbed habitat on site. Additionally, since there is no Implementing Agreement between the City and the wildlife agencies for the Oceanside Subarea Plan, the mitigation ratios provided in the plan are used as a guidance, and the City has discretion as to when they require mitigation. Given the long history of disturbance on site, the City is not requiring mitigation for the disturbed areas. Justification of proposed mitigation for the project is outlined in the Biological Technical Report, included as Appendix C to the Draft and Final EIR.
- A2-6** The comment provides a summary of CEQA and the California Natural Diversity Database. The comment does not raise any specific issues related to the adequacy of the Draft EIR.

**A2-7** The comment includes concluding remarks. The comment does not raise any specific environmental issues related to the adequacy of the Draft EIR.

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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  
www.wildlife.ca.gov

GAVIN NEWSOM, Governor  
CHARLTON H. BONHAM, Director



December 14, 2022

Patricia Anders  
Contract Planner  
City of Oceanside  
300 N. Coast Highway  
Oceanside, Ca 92054  
[PAnders@oceansideca.org](mailto:PAnders@oceansideca.org)

**Subject: Modera Melrose Mixed Use Development Project, Draft Environmental Impact Report (DEIR), SCH #2022030032**

Dear Ms. Anders:

The California Department of Fish and Wildlife (CDFW) received a Notice of Availability of a Draft Environmental Impact Report (DEIR) from the City of Oceanside (City) for the Modera Melrose Mixed Use Development Project (Project) pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.<sup>1</sup>

Thank you for the opportunity to provide comments and recommendations regarding the activities involved in the Modera Melrose Mixed Use Development Project that may affect California fish and wildlife. Likewise, we appreciate 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, subdivision (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines, § 15386, subdivision (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 (Id., § 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 state fish and wildlife resources.

CDFW is also submitting comments 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, including 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" (see Fish & G. Code, § 2050) of

<sup>1</sup> 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.

A2-1  
A2-2

*Conserving California's Wildlife Since 1870*

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Patricia Anders  
City of Oceanside  
December 14, 2022  
Page 2 of 4

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.), CDFW recommends the Project proponent obtain appropriate authorization under the Fish and Game Code.

CDFW also administers the Natural Community Conservation Planning (NCCP) program, a California regional habitat conservation planning program. The City of Oceanside has participated in the NCCP program by preparing a draft Subarea Plan (SAP) under the North County Subregional Multiple Habitat Conservation Program (MHCP). However, the Oceanside SAP has not been finalized and has not been adopted by the City or received permits from the Wildlife Agencies (jointly, CDFW and the U.S. Fish and Wildlife Service (USFWS)).

A2-2  
Cont.

**PROJECT DESCRIPTION SUMMARY**

**Proponent:** City of Oceanside

**Objective:** The proposed Project includes development of 323 multi-family residential units and ground-level commercial space on the 7.4-acre site. There would be six buildings, five of which would be four-to five-story residential buildings, and one would be a four-story mixed-use building that would include commercial uses. The development would also include 526 parking spaces for residences and guests.

**Location:** The 7.4-acre Project site is located at the southeast corner of Oceanside Boulevard and Bobier Drive on a vacant undeveloped parcel in the east-central portion of the City of Oceanside. The Project site's eastern boundary abuts the City of Vista. It is approximately 1.6 miles south of State Route (SR) 76 and approximately 2 miles north of SR 78.

**Biological Setting:** The site is located in a primarily developed area. Uses in the vicinity of the Project site include residential development, open space, and commercial use. The site abuts existing residential developments to the east, and commercial used to the west. The Melrose Drive Sprinter Light Rail Station is located 0.07 miles west of the site. The Biological Technical Report (BTR, Dudek, August 2022) states that the site is primarily disturbed, vacant land that has experienced periodic disturbance through mowing and/or disking for many years. Per the DEIR, the site is made up of primarily non-native grasslands, and small, isolated patches of Diegan coastal sage scrub on the western and northwestern portions. The proposed project would impact various vegetation types onsite including 0.49 acre of disturbed Diegan coastal sage scrub (DCSS), 5.13 acres of non-native grassland, 0.10 acre of ornamental, and 1.67 acres of disturbed habitat.

A2-3

**COMMENTS AND RECOMMENDATIONS**

CDFW offers the following comments and recommendations to assist the City in identifying and/or mitigating Project impacts on biological resources and to ensure regional conservation objectives in the MHCP and draft Oceanside SAP would not be eliminated by implementation of the Project.

CDFW recommends the impacts to Diegan coastal sage scrub (DCSS) be consistent with the draft SAP. Per the BTR, there is 0.49 acre of disturbed DCSS onsite that will be impacted by the development. A mitigation ratio of 1:1 is proposed because of a high level of disturbance of the

A2-4

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Patricia Anders  
City of Oceanside  
December 14, 2022  
Page 3 of 4

coastal sage scrub onsite, small sizes of DCSS habitat patches, and soil disturbance within the DCSS. However, the draft SAP (2010) Table 5-2, requires CSS to be mitigated at a 2:1 ratio if it is not within a Focused Planning Area (FPA), within Offsite Mitigation Zone II, or Remaining Areas as identified in the draft SAP. This site is not within an FPA or the Wildlife Corridor Planning Zone (WCPZ); therefore, it should be mitigated at 2:1. Although the BTR says this site is disturbed, it is still functioning as habitat for native species. Furthermore, because this property has not been authorized for impacts which may have justified the disturbed aspects of the property, the onsite DCSS should be mitigated at 2:1 ratio consistent with the draft SAP.

↑  
A2-4  
Cont.

The DEIR fails to propose mitigation for the habitat identified as "disturbed." The BTR classifies habitat onsite as non-native grassland (5.13 acres) and 1.67 acres as disturbed habitat. Mitigation is proposed for the non-native grassland. However, no mitigation is proposed for the 1.67 acres of disturbed habitat. This evaluation was based on the site having been subject to repeated grading, compaction, and clearing of vegetation. Again, no evidence has been provided to justify that activities leading to the disturbed condition of the property were authorized, and if the grading and clearing had been authorized there should have been mitigation required at that point in time. According to the draft SAP Figure 3-2 Updated Vegetation Communities, this site was previously mapped as grassland. Therefore, as no justification is provided as to how the disturbed activities were authorized that caused a reduction in habitat quality, and mapping as 'Disturbed,' CDFW recommends that the 1.67 acres of disturbed habitat be mitigated as non-native grassland at 0.5:1. This would increase the 5.13 acres of non-native grassland to 6.80 acres requiring mitigation at a 0.5:1 ratio. CDFW believes this is justified because the site is still functioning as grassland and has special-status species within the vicinity.

↑  
A2-5

**ENVIRONMENTAL DATA**

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a data base 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 field survey form can be found at the following link:

<https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>

The completed form can be mailed electronically to CNDDDB at the following email address: [CNDDDB@wildlife.ca.gov](mailto:CNDDDB@wildlife.ca.gov). The types of information reported to CNDDDB can be found at the following link: [http://www.dfg.ca.gov/biogeodata/cnddb/plants\\_and\\_animals.asp](http://www.dfg.ca.gov/biogeodata/cnddb/plants_and_animals.asp).

↑  
A2-6

**FILING FEES**

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of 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 fee is 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.)

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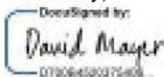
Patricia Anders  
City of Oceanside  
December 14, 2022  
Page 4 of 4

**CONCLUSION**

CDFW appreciates the opportunity to comment on the DEIR to assist the City in identifying and mitigating Project impacts on biological resources and ensuring Project consistency with the requirement of the draft SAP under the overarching Subregional Northwestern San Diego County MHCP.

Questions regarding this letter or further coordination should be directed to Emily Gray, Environmental Scientist, at [Emily.Gray@wildlife.ca.gov](mailto:Emily.Gray@wildlife.ca.gov).

Sincerely,



DocuSigned by:  
David Mayer  
073064530375405

David Mayer  
Environmental Program Manager  
South Coast Region

ec: CDFW  
Karen Drewe, San Diego – [Karen.Drewe@wildlife.ca.gov](mailto:Karen.Drewe@wildlife.ca.gov)  
Cindy Hailey, San Diego – [Cindy.Hailey@wildlife.ca.gov](mailto:Cindy.Hailey@wildlife.ca.gov)  
OPR  
State Clearinghouse, Sacramento – [State.Clearinghouse@opr.ca.gov](mailto:State.Clearinghouse@opr.ca.gov)  
USFWS  
Jonathan Snyder, U.S. Fish and Wildlife Service – [Jonathan.Snyder@fws.gov](mailto:Jonathan.Snyder@fws.gov)

**References**

California Department of Fish and Wildlife. 2020. California Natural Diversity Database. Available from: <https://wildlife.ca.gov/Data/CNDDDB>.

Dudek. Biological Technical Report for Modera Melrose Project. August 2022.

Final MHCP Executive Summary. 2003. Multiple Habitat Conservation Program for the Cities of Carlsbad, Escondido, Oceanside, San Marcos, Solana Beach, and Vista.

City of Oceanside Subarea Plan. 2010. Available from: <https://ci.oceanside.ca.us/gov/dev/planning/subarea.asp>

A2-7

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## Response to Comment Letter A3

Agency  
California Department of Transportation (Caltrans)  
December 14, 2022

- A3-1** The comment provides an introduction to comments that follow. The comment does not raise any specific issues related to the adequacy of the Draft EIR.
- A3-2** The comment requests volume information for the traffic at Melrose and Vista Way. The traffic study area does not include Melrose Drive and Vista Way, as Vista Way is approximately 1.7 miles south of the project site. As described in Appendix L, the study area was developed based on the assignment of project traffic and location. The study area was determined to meet and exceed the City Guidelines.
- A3-3** The comment expresses that Caltrans looks forward to potential opportunities to coordinate with the City to make improvements to safety, access, and mobility; reduce greenhouse gas (GHG) emissions; and maintain access during project construction. As described in Section 4.15.4, all construction-related traffic would access the project site via the proposed entrance along West Bobier Drive on the northeastern boundary of the project site, and most of the construction activities would occur on the project site. For any potential construction-related activities in the public right-of-way during the construction period, applicable City regulations and policies require two-way traffic to be maintained. Additionally, as concluded in Section 4.7.4 and Section 4.15.4 of the Draft EIR, the project would result in less-than-significant impacts related to GHG emissions and traffic and circulation.
- A3-4** The comment states that there is a strong link between transportation and land use, and the City should continue to coordinate with Caltrans to implement improvements where there is joint jurisdiction. The City acknowledges this comment. The comment does not raise any specific issues related to the adequacy of the Draft EIR.
- A3-5** The comment states that Caltrans welcomes the opportunity to be a Responsible Agency for the project due to the project being located within a Caltrans right-of-way. The City acknowledges this comment. The comment does not raise any specific issues related to the adequacy of the Draft EIR.
- A3-6** The comment states that an encroachment permit would be required for any work within the Caltrans right-of-way; the project would be required to provide an approved final environmental document; and the document must address all impacts within the Caltrans right-of-way and any impacts from avoidance or mitigation in the document. The comment does not raise any specific issues related to the adequacy of the Draft EIR.
- A3-7** The comment recommends that the project specifically identify and assess project impacts, including project mitigation efforts within Caltrans' right-of-way (including natural environment and infrastructure). The Draft EIR has analyzed all project impacts on the environment including that of mitigation efforts as required by CEQA.
- A3-8** The comment states that Caltrans would welcome to opportunity to be a Responsible Agency under CEQA for future projects resulting from changes to the General Plan that would affect Caltrans' right-

of-way. The City acknowledges this comment. The comment does not raise any specific issues related to the adequacy of the Draft EIR.

**A3-9** The comment recognizes that teleworking and remote learning reduces impacts of traffic, reducing vehicle miles traveled (VMT) and GHG emissions. The comment also states that reliable high-speed broadband is a key component in reaching the state's transportation and climate action goals. The comment does not raise any specific issues related to the adequacy of the Draft EIR.

**A3-10** The comment states that perpetuation of survey monuments by a licensed land surveyor is required, if they are being destroyed by any construction. No survey monuments would be destroyed during project construction. The comment also states that any work performed within Caltrans' right-of-way will require discretionary review and approval by Caltrans, and an encroachment permit will be required for any work within the Caltrans' right-of-way prior to construction. The City acknowledges this comment. The comment does not raise any specific issues related to the adequacy of the Draft EIR.

**A3-11** The comment includes concluding remarks. The comment does not raise any specific environmental issues related to the adequacy of the Draft EIR.

CALIFORNIA STATE TRANSPORTATION AGENCY

GAVIN NEWSOM, GOVERNOR

California Department of Transportation

DISTRICT 11  
4050 TAYLOR STREET, MS-240  
SAN DIEGO, CA 92110  
(619) 709-5152 | FAX (619) 688-4299 TTY 711  
[www.dot.ca.gov](http://www.dot.ca.gov)



December 14, 2022

11-SD-76, 78  
PM VAR

Modera Melrose Mixed Use Development Project  
DEIR/SCH#2022030032

Ms. Patricia Anders  
Contract Planner  
City of Oceanside  
300 Coast Highway  
Oceanside, CA 92054

Dear Ms. Anders:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Draft Environmental Impact Report (DEIR) for the Modera Melrose Mixed Use Development Project located near State Route 76 (SR-76) and State Route 78 (SR-78). The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.

Safety is one of Caltrans' strategic goals. Caltrans strives to make the year 2050 the first year without a single death or serious injury on California's roads. We are striving for more equitable outcomes for the transportation network's diverse users. To achieve these ambitious goals, we will pursue meaningful collaboration with our partners. We encourage the implementation of new technologies, innovations, and best practices that will enhance the safety on the transportation network. These pursuits are both ambitious and urgent, and their accomplishment involves a focused departure from the status quo as we continue to institutionalize safety in all our work.

Caltrans is committed to prioritizing projects that are equitable and provide meaningful benefits to historically underserved communities, to ultimately improve transportation accessibility and quality of life for people in the communities we serve.

We look forward to working with the City of Oceanside in areas where the City and Caltrans have joint jurisdiction to improve the transportation network and connections

"Provide a safe and reliable transportation network that serves all people and respects the environment"

A3-1

Ms. Patricia Anders, Contract Planner  
December 14, 2022  
Page 2

between various modes of travel, with the goal of improving the experience of those who use the transportation system.

↑ A3-1  
Cont.

Caltrans has the following comments:

**Signal Operations**

Please provide any volume information for the traffic at Melrose and Vista Way. This will be helpful for determining if changes to the timing will be needed on state Right-of-Way (R/W).

↑ A3-2

**Complete Streets and Mobility Network**

Caltrans views all transportation improvements as opportunities to improve safety, access and mobility for all travelers in California and recognizes bicycle, pedestrian and transit modes as integral elements of the transportation network. Caltrans supports improved transit accommodation through the provision of Park and Ride facilities, improved bicycle and pedestrian access and safety improvements, signal prioritization for transit, bus on shoulders, ramp improvements, or other enhancements that promotes a complete and integrated transportation network. Early coordination with Caltrans, in locations that may affect both Caltrans and the City of Oceanside is encouraged.

↑ A3-3

To reduce greenhouse gas emissions and achieve California's Climate Change target, Caltrans is implementing Complete Streets and Climate Change policies into State Highway Operations and Protection Program (SHOPP) projects to meet multi-modal mobility needs. Caltrans looks forward to working with the City to evaluate potential Complete Streets projects.

Maintaining bicycle, pedestrian, and public transit access during construction is important. Mitigation to maintain bicycle, pedestrian, and public transit access during construction is in accordance with Caltrans' goals and policies.

**Land Use and Smart Growth**

Caltrans recognizes there is a strong link between transportation and land use. Development can have a significant impact on traffic and congestion on State transportation facilities. In particular, the pattern of land use can affect both local vehicle miles traveled and the number of trips. Caltrans supports collaboration with local agencies to work towards a safe, functional, interconnected, multi-modal transportation network integrated through applicable "smart growth" type land use planning and policies.

↑ A3-4

"Provide a safe and reliable transportation network that serves all people and respects the environment"

Ms. Patricia Anders, Contract Planner  
December 14, 2022  
Page 3

The City should continue to coordinate with Caltrans to implement necessary improvements at intersections and interchanges where the agencies have joint jurisdiction.

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A3-4  
Cont.

**Environmental**

Caltrans welcomes the opportunity to be a Responsible Agency under the California Environmental Quality Act (CEQA), as we have some discretionary authority of a portion of the project that is in Caltrans' R/W through the form of an encroachment permit process. We look forward to the coordination of our efforts to ensure that Caltrans can adopt the alternative and/or mitigation measure for our R/W.

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A3-5

An encroachment permit will be required for any work within the Caltrans' R/W prior to construction. As part of the encroachment permit process, the applicant must provide approved final environmental documents for this project, corresponding technical studies, and necessary regulatory and resource agency permits. Specifically, CEQA determination or exemption. The supporting documents must address all environmental impacts within the Caltrans' R/W and address any impacts from avoidance and/or mitigation measures.

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A3-6

We recommend that this project specifically identifies and assesses potential impacts caused by the project or impacts from mitigation efforts that occur within Caltrans' R/W that includes impacts to the natural environment, infrastructure including but not limited to highways, roadways, structures, intelligent transportation systems elements, on-ramps and off-ramps, and appurtenant features including but not limited to lighting, signage, drainage, guardrail, slopes and landscaping. Caltrans is interested in any additional mitigation measures identified for the project's draft Environmental Document.

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A3-7

Should future projects based upon the changes enacted from the General Plan have elements and/or mitigation measures that affect Caltrans Right-of-Way, Caltrans would welcome the opportunity to be a Responsible Agency under the California Environmental Quality Act (CEQA).

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A3-8

**Broadband**

Caltrans recognizes that teleworking and remote learning lessen the impacts of traffic on our roadways and surrounding communities. This reduces the amount of VMT and decreases the amount of greenhouse gas (GHG) emissions and other pollutants. The availability of affordable and reliable, high-speed broadband is a key component in

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A3-9  
↓

"Provide a safe and reliable transportation network that serves all people and respects the environment"

Ms. Patricia Anders, Contract Planner  
December 14, 2022  
Page 4

supporting travel demand management and reaching the state's transportation and climate action goals.

↑ A3-9  
| Cont.

**Right-of-Way**

- Per Business and Profession Code 8771, perpetuation of survey monuments by a licensed land surveyor is required, if they are being destroyed by any construction.
- Any work performed within Caltrans' R/W will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans' R/W prior to construction.

| A3-10

Additional information regarding encroachment permits may be obtained by contacting the Caltrans Permits Office at (619) 688-6158 or emailing [D11.Permits@dot.ca.gov](mailto:D11.Permits@dot.ca.gov) or by visiting the website at <https://dot.ca.gov/programs/traffic-operations/ep>. Early coordination with Caltrans is strongly advised for all encroachment permits.

| A3-11

If you have any questions or concerns, please contact Kimberly Dodson, LDR Coordinator, at (619) 985-1587 or by e-mail sent to [Kimberly.Dodson@dot.ca.gov](mailto:Kimberly.Dodson@dot.ca.gov).

Sincerely,

*Maurice A. Eaton*

MAURICE EATON  
Branch Chief  
Local Development Review

"Provide a safe and reliable transportation network that serves all people and respects the environment"

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## **Response to Comment Letter A4**

**Agency**  
**Vista Irrigation District (VID)**  
**November 1, 2022**

- A4-1** The comment provides an introduction to comments that follow. The comment does not raise any specific issues related to the adequacy of the Draft EIR, and no further response is required.
- A4-2** The comment states that the project site is within the limits of a reserved easement for the VID. The VID requests that this easement be discussed in the Draft EIR. In response, the easement referenced in the letter does not impact the project property, as it is located approximately 1,200 feet west of the project site on the north side of Oceanside Boulevard. No changes to the Draft EIR are required as a result of this comment.
- A4-3** The comment includes concluding remarks. The comment does not raise any specific environmental issues related to the adequacy of the Draft EIR, and no further response is required.

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1391 Engineer Street • Vista, California 92081-8840  
Phone (760) 597-3100 • Fax: (760) 598-8757  
www.vidwater.org

November 1, 2022

Patty Anders  
City of Oceanside  
300 North Coast Highway  
Oceanside, CA 92054

**Board of Directors**

- Marty Miller, *President*
- Paul E. Dorey
- Jo MacKenzie
- Patrick Sanchez
- Richard L. Vásquez

**Administrative Staff**

- Brett L. Hodgkiss  
*General Manager*
- Lisa R. Soto  
*Board Secretary*
- Elizabeth A. Mitchell  
*General Counsel*

Re: Development Plan (D21-00011); SCH No. 2022030032; Modera Melrose Project

Dear Patty Anders:

Thank you for the opportunity to review and comment on the Draft Environmental Impact Report (DEIR) for the proposed Modera Melrose Project, which proposes 323 mixed-use residential units on approximately 7.4 acres of property within the City of Oceanside.

A4-1

As mentioned in Chapter 3 of the DEIR, the City of Oceanside proposes to serve potable water to the Modera Melrose Project. While the Vista Irrigation District (District) would not serve the development, the District does have interest on the property, which falls within the limits of a reserved easement in the District's favor. This easement, recorded on November 16, 1943 in Book 1571, Page 346 of Official Records in the office of the County Recorder, reserves the right of ingress and egress to, over and across the easement limits for purposes of constructing, maintaining, operating, repairing and rebuilding or inspecting all pipe lines and necessary appurtenances and measuring devices.

A4-2

The District requests that the above-mentioned easement be acknowledged and discussed in the DEIR, and that appropriate measures are presented to address the District's interest.

If you have any questions concerning this matter, please do not hesitate to contact me at (760) 597-3100.

A4-3

Sincerely,  
*Robert Scholl*  
Robert Scholl, P.E.  
Engineering Services Manager  
VISTA IRRIGATION DISTRICT

*A public agency serving the city of Vista and portions of San Marcos, Escondido, Oceanside and San Diego County*

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## Response to Comment Letter O1

**Organization**  
**Buena Vista Audubon Society**  
**November 5, 2022**

- 01-1** The comment is an introduction to comments that follow. The comment does not raise any specific environmental issues related to the adequacy of the Draft EIR.
- 01-2** The comment provides information about Guajome Regional Park and states that the development should not degrade park habitat and wildlife in the park. The closest boundary of Guajome Regional Park is located approximately 0.4 miles north of the project site beyond West Bobier Drive and a multifamily residential development. Direct and indirect impacts to vegetation communities, species, and habitat were all analyzed in Section 4.3, Biological Resources. As described in Section 4.3.4, the site is surrounded by development, including an active residential development project (Melrose Heights) located between the biological study area and the nearest open space area (Guajome Regional Park), located approximately 600 feet north of the site. As a result, there is no direct connection between the biological study area and other natural areas that would support the movement of larger wildlife to or through the biological study area. For these reasons, it is determined that no direct impacts to wildlife corridors or habitat linkages would occur as a result of the proposed project. Short-term indirect impacts to habitat connectivity and wildlife corridors resulting from increased human activity would be reduced to less-than-significant levels through implementation of mitigation measures MM-BIO-3 (Biological Monitoring) and MM-BIO-4 (Temporary Installation of Fencing), outlined in Section 4.3.5. This comment does not require any changes to the Draft EIR.
- 01-3** The comment states that the height of the buildings can injure birds due to window reflections, and the project should adopt the City of San Francisco Standards for bird-safe buildings. The referenced guidelines are specifically for very tall buildings in San Francisco. The proposed buildings for the Modera Melrose project are 4 to 5 stories located adjacent to existing roads and surrounding developments as an infill project. This area does not have high potential to support special-status species and is not located within a bird migration corridor.
- 01-4** The comment expresses concern about the project landscaping around the buildings introducing non-native and invasive plant species to the area, including the park. The comment further states that project landscaping should be required to use native plants as a condition of approval to reduce impacts from non-native and invasive plants. As described in Draft EIR Section 4.3, Biological Resources, potential indirect impacts such as introduction of non-native invasive species would be mitigated through implementation of mitigation measures MM-BIO-3 (Biological Monitoring) and MM-BIO-5 (Invasive Species Prohibition). Specifically, MM-BIO-5 would ensure that the final landscape plans would be reviewed to confirm that no invasive plant species would be included. This comment does not require any changes to the Draft EIR.
- 01-5** The comment recommends that the mitigations recommended in previous comments be incorporated to reduce biological impacts below the level of significance and includes concluding remarks. Please refer to Responses to Comments O1-2 through O1-4 regarding the project's less-than-significant biological impacts with mitigation incorporated. As the project has reduced all biological impacts to

less-than-significant levels, no further mitigation is required. This comment does not require any changes to the Draft EIR.

**From:** joan herskowitz <[jmherskowitz@yahoo.com](mailto:jmherskowitz@yahoo.com)>  
**Sent:** Saturday, November 5, 2022 7:16 AM  
**To:** Patricia Anders <[PAnders@oceansideca.org](mailto:PAnders@oceansideca.org)>  
**Subject:** Comments on Madera Melrose Development Project NOP

**Warning: External Source**

Dear Ms. Anders:

The following are comments from the Buena Vista Audubon Society on the proposed Madera Melrose mixed-use housing development including 323 housing units located at Melrose Drive and W. Bobier Drive in Oceanside.

01-1

The project is located in the vicinity of the 394-acre Guajome Regional Park which contains diverse Southern California habitats, including woodlands, chaparral, coastal sage scrub, wetlands and mixed grasslands. The park also contains two ponds that attract and support both resident and migratory birds. Therefore, it is important that development in the area not degrade park habitat and wildlife.

01-2

The proposed buildings will be 4 and 5 stories and windows at these levels can injure and kill birds, since they can get disoriented from window reflections. In order to mitigate project impacts on area birdlife, the project should incorporate applicable City of San Francisco Standards for Bird-safe Buildings to reduce the potential for avian collisions. These standards require building facade, glazing, and lighting conditions to achieve a "bird safe building".

01-3

In addition, landscaping around the buildings can introduce non-native and invasive plants to the surrounding area including the park. Therefore, to mitigate these potential impacts, native plant landscaping should be required as a condition of approval.

01-4

We recommend these mitigations to reduce biological impacts to below the level of significance. Thank you for considering our views on this matter.

01-5

Please confirm receipt of this email. Thank you.

Joan Herskowitz  
Conservation Committee  
Buena Vista Audubon Society

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## **Response to Comment Letter O2**

**Organization**  
**Supporters Alliance for Environmental Responsibility**  
**December 12, 2022**

- 02-1** The comment provides an introduction to comments that follow and a summary of the project description. The comment does not raise any specific issues related to the adequacy of the Draft EIR.
- 02-2** The comment states that the Draft EIR fails as an informational document and fails to implement all feasible mitigation measures to reduce the project's significant impacts, and states that the Draft EIR needs to be recirculated. The comment does not raise any specific issues related to specific topics or mitigation measures in the Draft EIR that they believe are not adequately addressed. As discussed in the Draft EIR, all potentially significant impacts are mitigated to less-than-significant levels, and no further mitigation is required. No further response is required because the comment does not raise an issue related to the adequacy of any specific section or analysis of physical environmental impacts in the Draft EIR.
- 02-3** The comment states that they reserve the right to supplement their comment during the review of the Final EIR and at public hearings for the project. The City acknowledges this comment. The comment does not raise any specific issues related to the adequacy of the Draft EIR.

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Via Email

December 12, 2022

Patty Anders, Contract Planner  
 Planning Division  
 City of Oceanside  
 300 North Coast Highway  
 Oceanside, CA, 92054  
 panders@oceansideca.org

**Re: Comment on Draft Environmental Impact Report, Modera Melrose Project (D21-00011, BD21-00005, SCH No. 2022030032)**

Dear Ms. Anders:

I am writing on behalf of Supporters Alliance for Environmental Responsibility (“SAFER”) regarding the Draft Environmental Impact Report (“DEIR”) prepared for the Modera Melrose Project (D21-00011, BD21-00005, SCH No. 2022030032), including all actions related or referring to the proposed development of six four- to five-story mixed use buildings with a total of 323 rental units and 2,336 square feet of commercial space, located at the southeast corner of Melrose Drive and West Bobier Drive in the City of Oceanside (“Project”).

02-1

After reviewing the DEIR, we conclude that the DEIR fails as an informational document and fails to impose all feasible mitigation measures to reduce the Project’s significant environmental impacts. SAFER requests that the Planning Division address these shortcomings in a revised draft environmental impact report (“RDEIR”) and recirculate the RDEIR prior to considering approvals for the Project.

02-2

We reserve the right to supplement these comments during review of the Final EIR for the Project and at public hearings concerning the Project. *Galante Vineyards v. Monterey Peninsula Water Management Dist.*, 60 Cal. App. 4th 1109, 1121 (1997).

02-3

Sincerely,

Adam Frankel  
 LOZEAU | DRURY LLP

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## Response to Comment Letter O3

Organization  
Southwest Mountain States Regional Council of Carpenters  
December 14, 2022

- 03-1** The comment provides an introduction to comments that follow. The commenter requests to be notified of any notices referring to or related to the project. The comment does not raise any specific issues related to the adequacy of the Draft EIR.
- 03-2** The comment states that the City should require that the project be built using local workers. The comment expresses the opinion of the commenter and does not raise any specific issues related to the adequacy of the Draft EIR.
- 03-3** The comment lists potential benefits of hiring local workers such as reducing length of trips, greenhouse gas emissions, economic benefits, and air pollutant reductions. The comment does not raise any specific issues related to the adequacy of the Draft EIR.
- 03-4** The comment states that located jobs closer to residential area can lead to people being more likely to take transit, walk, or bike, and reduces vehicle miles traveled (VMT). The comment further states that local hire and workforce policies as a condition of approval for development permits are critical to VMT reductions. The comment does not raise any specific issues related to the adequacy of the Draft EIR.
- 03-5** The comment includes information about the Affordable Housing and High Road Jobs Act of 2022 and affordability and labor requirements. The comment further expresses the opinion of the commenter that the City should consider utilizing local workforce to mitigate GHG emissions, air quality, and transportation impacts. As discussed in the Draft EIR, all project impacts have been reduced to less-than-significant levels, and no further mitigation is required.
- 03-6** The comment states that the City should impose training requirements to prevent the spread of Covid-19 and other infectious diseases. The comment further states that construction sites have been identified as being sources of community spread and then lists recommendations for safe construction site work practices. Public Resources Code Section 21083(b)(3) and CEQA Guidelines Section 15065(a)(4) provide that a project may have a significant effect on the environment if the project will cause substantial adverse effects on human beings, either directly or indirectly. COVID-19 is not an environmental effect of the project; it is already present in the population and unrelated to the proposed development. CEQA generally does not require analysis of an impact caused by the existing environment on the project. As such, no analysis is required. Public health in connection with COVID-19 is addressed by workplace health and safety laws other than CEQA. This comment does not require any revisions to the EIR.
- 03-7** The comment states the United Brotherhood of Carpenters and Carpenters International Training Fund and the Southwest Mountain State Carpenters have developed training programs. The comment further states that the City should require COVID-19 training before construction activities begin. The comment does not raise any specific issues related to the adequacy of the Draft EIR.

**03-8** The comment acts as an introduction to comments to follow about the project’s compliance with CEQA. The comment provides background on EIRs and the CEQA process. The comment does not raise any specific issues related to the adequacy of the Draft EIR.

**03-9** The comment provides background information about deferred mitigation. The comment does not raise any specific issues related to the adequacy of the Draft EIR.

**03-10** The comment states that the Draft EIR defers noise mitigation during construction because mitigation measure MM-NOI-1 has not laid out the specific noise-reducing measures that would be used and requires the submittal of a Construction Noise Management Plan. MM-NOI-1 does specify measures to be implemented in the case that sample collected noise level data indicates that the 8-hour noise threshold has or will be exceeded, construction work shall be suspended and one or more of the following would be implemented:

- i. Administrative controls (e.g., reduce operating time of equipment and/or prohibit usage of equipment type[s] within certain distances).
- ii. Engineering controls (upgrade noise controls, such as install better engine exhaust mufflers).
- iii. Install noise abatement on the site boundary fencing (or within, as practical and appropriate) in the form of sound blankets or comparable temporary barriers to occlude construction noise emission between the site (or specific equipment operation as the situation may define) and the noise-sensitive receptor(s) of concern.

The City deems this mitigation measure sufficient for the project Mitigation Monitoring and Reporting Program, and no additional mitigation is warranted. This comment does not require any revisions to the Draft EIR.

**03-11** The comment states that the Draft EIR fails to mitigate for traffic impacts. The comment further explains that the purpose of CEQA is to identify what significant impacts can be mitigated and if they can’t what is necessary for a project to be approved with them. The comment does not specifically state how the Draft EIR fails to mitigate for traffic impacts. Please refer to Draft EIR Section 4.15, Traffic and Circulation, for additional information, which concludes that all impacts related to traffic would be less than significant and would not require mitigation. This comment does not require any revisions to the Draft EIR.

**03-12** The comment incorrectly states that the project did not perform a VMT analysis and that the project would exceed the 1,000 average daily trips threshold. The comment further states that the project does not meet the Transit Priority Area (TPA) exception for screening out of VMT analysis because the transit stop accessible to the project site has a greater frequency than 15 minutes and therefore would not qualify for the VMT exemption. A VMT Analysis is included as Appendix K to the Draft EIR. The commenter incorrectly applies the 15-minute headway criteria to the Sprinter Transit Station, which is located 0.25 miles from the project site. Transit corridors can be either major bus lines or fixed rail corridors. If a project is near bus lines, the frequency of the bus service must be 15 minutes. However, this frequency is not required if the transit is a fixed rail line. As evidence of this, San Diego Association of Governments (SANDAG) TPA footnote (1) to Table 2 says “existing rail transit station served by either a bus or rail transit service OR the intersection of 2 or more bus routes.” In addition, the SANDAG TPA maps include the entire Sprinter Line as being within a TPA even though the frequency is 30 minutes.

The SANDAG 2035 TPA map is the source of what is considered a TPA and is what the City of Oceanside uses to determine if a VMT analysis is required. This comment does not require any revisions to the Draft EIR.

**03-13** The comment summarizes the requirement for all feasible mitigation be implemented when a project has a potentially significant impact. The comment does not raise any specific issues related to the adequacy of the Draft EIR.

**03-14** The comment states that the Draft EIR fails to utilize all feasible mitigation measures to reduce the air quality impacts from volatile organic compounds. The comment further requests that other feasible mitigation measures be discussed as well and the Draft EIR recirculated. The comment incorrectly interprets the CEQA Guidelines to read that all feasible mitigation must be applied and analyzed when the significant effect has already been mitigated below a level of significance. As discussed in Draft EIR Section 4.2, Air Quality, impacts to air quality from volatile organic compounds would be reduced to less-than-significant levels with the implementation of MM-AQ-1. This comment does not require any revisions to the EIR.

**03-15** The comment provides background information about the CEQA Guidelines providing the lead agency to determine the methodology and significance level for the analysis of GHG impacts as long as the selection is supported by substantial evidence. The comment does not raise any specific issues related to the adequacy of the Draft EIR.

**03-16** The comment states that the project does not rely on quantitative analysis to determine compliance with the numerical thresholds of the CAP. In response, as described in Section 4.7, Greenhouse Gas Emissions, per City guidance, new development projects that emit more than 900 metric tons of carbon dioxide equivalent (MT CO<sub>2e</sub>) annually could have a considerable contribution to cumulative climate change impacts. Given that project-generated operational emissions in 2024 plus amortized project construction emissions are estimated to exceed this bright-line threshold, the project is required to demonstrate consistency with the Climate Action Plan (CAP) Consistency Checklist to ensure that the specific emissions targets identified in the City's CAP can be achieved. The CAP consistency checklist does not require additional quantitative analysis for numerical thresholds. Please refer to Appendix C of Appendix B of the Draft EIR. This comment does not require any revisions to the Draft EIR.

**03-17** The comment states that the project violates the State Planning and Zoning Law and the General Plan. The comment further provides background about the State Planning and Zoning Law and provides case laws. The project does not include a general plan amendment or rezone. As described in Draft EIR Section 3.3, the project requests a Density Bonus as the project includes 33 very low-income units. Density Bonus Law requires the City to grant incentives/concessions and unlimited waivers. By providing 15% very low-income units, the project is entitled to receive up to three incentives/concessions. In order to accommodate the increased density allowed under Density Bonus Law, the project cannot physically comply with all of the development standards that apply to standard projects. With City approval of the requested Density Bonus and incentives, the project would be consistent with the existing zoning and general plan land use designated for the site. The comment does not raise any specific reason why the project violates the State Planning and Zoning Law and the General Plan. This comment does not require any revisions to the Draft EIR.

- 03-18** The comment includes concluding remarks and requests the City recirculate the Initial Study/Mitigated Negative Declaration (IS/MND). The comment incorrectly refers to the Draft EIR as an IS/MND. The comment does not raise any specific environmental issues related to the adequacy of the Draft EIR, and no further response is required.
- 03-19** The comment provides an introduction to a technical report (“Local Hire Requirements and Considerations for Greenhouse Gas Modeling”) discussing local hire requirements and GHG modeling. The comment does not raise any specific environmental issues related to the adequacy of the Draft EIR, and no further response is required.
- 03-20** The comment explains the relationship between trip length and GHG emissions. The comment does not raise any specific environmental issues related to the adequacy of the Draft EIR, and no further response is required.
- 03-21** The comment explains the assumptions used to quantify the relationship between worker trip length and local hire requirements. The comment does not raise any specific environmental issues related to the adequacy of the Draft EIR, and no further response is required.
- 03-22** The comment provides an example of a local hire requirement for a project and how it impacts the GHG emissions associated with the project. The comment does not raise any specific environmental issues related to the adequacy of the Draft EIR, and no further response is required.
- 03-23** The comment concludes that the exercise in this technical report 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. The comment does not raise any specific environmental issues related to the adequacy of the Draft EIR, and no further response is required.
- 03-24** This comment includes a disclaimer for the technical preparer, SWAPE. The comment does not raise any specific environmental issues related to the adequacy of the Draft EIR, and no further response is required.
- 03-25** The comment includes an attachment to the GHG memo attached to the comment letter. The comment does not raise any specific environmental issues related to the adequacy of the Draft EIR, and no further response is required.
- 03-26** The comment includes an attachment to the GHG memo attached to the comment letter. The comment does not raise any specific environmental issues related to the adequacy of the Draft EIR, and no further response is required.
- 03-27** The comment includes an attachment to the GHG memo attached to the comment letter. The comment does not raise any specific environmental issues related to the adequacy of the Draft EIR, and no further response is required.
- 03-28** The comment includes the resume of Dr. Paul Rosenfeld. The comment does not raise any specific environmental issues related to the adequacy of the Draft EIR, and no further response is required.
- 03-29** The comment includes the resume of Matthew Hagemann. The comment does not raise any specific environmental issues related to the adequacy of the Draft EIR, and no further response is required.

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



**Mitchell M. Tsai**  
Attorney At Law

139 South Hudson Avenue  
Suite 200  
Pasadena, California 91101

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**VIA E-MAIL**

December 14, 2022

Patty Anders  
City of Oceanside  
300 North Coast Highway  
Oceanside, CA 92054  
Em: panders@oceansideca.org

**RE: City of Oceanside Modera Melrose Project**

Dear Patty Anders,

On behalf of the Southwest Mountain States Regional Council of Carpenters (“**Southwest Mountain States Carpenters**” or “**SWMSRCC**”), my Office is submitting these comments for the City of Oceanside (“**City**”) concerning the Modera Melrose Project (“**Project**”) DEIR.

The Southwest Mountain States Carpenters is a labor union representing 63,000 union carpenters in 10 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 SWMSRCC live, work, and recreate in the City and surrounding communities and would be directly affected by the Project’s environmental impacts.

The Southwest Mountain States Carpenters 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.

The Southwest Mountain States Carpenters incorporates by reference all comments raising issues regarding the Environmental Impact Report (EIR) submitted prior to certification of the EIR for the Project. See *Citizens for Clean Energy v City of Woodland*

03-1



City of Oceanside Modera Melrose  
December 13, 2022  
Page 2 of 16

(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, the Southwest Mountain States Carpenters requests that the City 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.

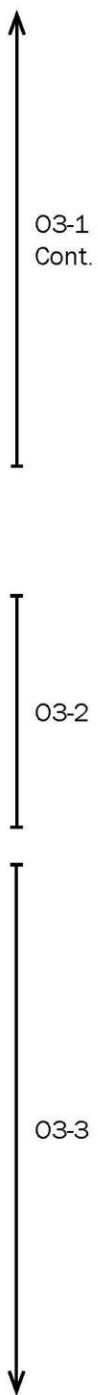
**I. THE CITY SHOULD REQUIRE THE USE OF A LOCAL WORKFORCE TO BENEFIT THE COMMUNITY’S ECONOMIC DEVELOPMENT AND ENVIRONMENT**

The City should require the Project to be built using a local workers who have graduated from a Joint Labor-Management Apprenticeship Program approved by the State of California, have at least as many hours of on-the-job experience in the applicable craft which would be required to graduate from such a state-approved apprenticeship training program, or who are registered apprentices in a state-approved apprenticeship training program.

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.



City of Oceanside Modera Melrose  
December 13, 2022  
Page 3 of 16

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.<sup>1</sup>

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 that the “[u]se of a local state-certified apprenticeship program” can result in air pollutant reductions.<sup>2</sup>

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.<sup>3</sup>

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

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03-4

<sup>1</sup> 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>.

<sup>2</sup> 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>.

<sup>3</sup> California Planning Roundtable (2008) Deconstructing Jobs-Housing Balance at p. 6, available at <https://cprroundtable.org/static/media/uploads/publications/cpr-jobs-housing.pdf>

City of Oceanside Modera Melrose  
December 13, 2022  
Page 4 of 16

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.<sup>4</sup> Some municipalities have even tied local hire and other workforce policies to local development permits to address transportation issues. Cervero and Duncan note that:

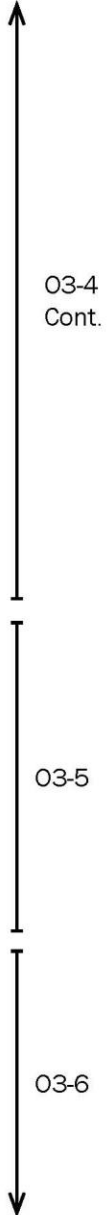
In nearly built-out Berkeley, CA, the approach to balancing jobs and housing is to create local jobs rather than to develop new housing. The city’s First Source program encourages businesses to hire local residents, especially for entry- and intermediate-level jobs, and sponsors vocational training to 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 City 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 CITY 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 Occupations Safety and Health Administration. Recently, several



<sup>4</sup> 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>.

City of Oceanside Modera Melrose  
December 13, 2022  
Page 5 of 16

construction sites have been identified as sources of community spread of COVID-19.<sup>5</sup>

Southwest Mountain States Carpenters recommend that the Lead Agency adopt additional requirements to mitigate public health risks from the Project's construction activities. SWMSRCC requests that the Lead Agency require safe on-site construction work practices as well as training and certification for any construction workers on the Project Site.

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

**Construction Site Design:**

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



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<sup>5</sup> 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>.

City of Oceanside Modera Melrose  
December 13, 2022  
Page 6 of 16

- 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.



O3-6  
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City of Oceanside Modera Melrose  
December 13, 2022  
Page 7 of 16

**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.<sup>6</sup>

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

Southwest Mountain 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.<sup>7</sup>

03-7

ICRA protocols are intended to contain pathogens, control airflow, and protect patients during the construction, maintenance and renovation of healthcare facilities.

<sup>6</sup> See also The Center for Construction Research and Training, North America’s Building Trades Unions (April 27 2020) NABTU and CPWR COVID-19 Standards for U.S. Construction Sites, available at [https://www.cpwr.com/sites/default/files/NABTU\\_CPWR\\_Standards\\_COVID-19.pdf](https://www.cpwr.com/sites/default/files/NABTU_CPWR_Standards_COVID-19.pdf); Los Angeles County Department of Public Works (2020) Guidelines for Construction Sites During COVID-19 Pandemic, available at [https://dpw.lacounty.gov/building-and-safety/docs/pw\\_guidelines-construction-sites.pdf](https://dpw.lacounty.gov/building-and-safety/docs/pw_guidelines-construction-sites.pdf).

<sup>7</sup> For details concerning Southwest Carpenters’s ICRA training program, see <https://icrahealthcare.com/>.

City of Oceanside Modera Melrose  
December 13, 2022  
Page 8 of 16

ICRA protocols prevent cross contamination, minimizing the risk of secondary infections in patients at hospital facilities.

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

03-7  
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**III. THE PROJECT WOULD BE APPROVED IN VIOLATION OF THE CALIFORNIA ENVIRONMENTAL QUALITY ACT**

**A. Background Concerning the California Environmental Quality Act**

The California Environmental Quality Act 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).<sup>8</sup> 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.” *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 564.

*1. Background Concerning Environmental Impact Reports*

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 Comes* (2001) 91 Cal.App.4th 1344, 1354; *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553; *Laurel Heights Improvement Assn.*, 47 Cal.3d at p. 400. 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.” CEQA Guidelines, § 15002, subd. (a)(2). If the project has a significant effect on the environment, the agency may approve the project only upon finding that it has “eliminated or substantially lessened all significant effects on the environment where feasible” and that any unavoidable significant effects on the environment are “acceptable due to overriding concerns” specified in Public Resources Code section 21081. See CEQA Guidelines, § 15092, subds. (b)(2)(A)-(B).

03-8

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

City of Oceanside Modera Melrose  
 December 13, 2022  
 Page 9 of 16

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 Jets*, 91 Cal.App.4th at p. 1355 (quoting *Laurel Heights Improvement Assn.*, 47 Cal.3d at pp. 391, 409 fn. 12) (internal quotations omitted). A clearly inadequate or unsupported study is entitled to no judicial deference. *Id.* 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 court stated in *Berkeley Jets*, 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. 91 Cal.App.4th at p. 1355 (internal quotations omitted).

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.

The fair argument test stems from the statutory mandate that an EIR be prepared for any project that “may have a significant effect on the environment.” PRC, § 21151; see *No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.App.3d 68, 75; accord *Jensen v. City of Santa Rosa* (2018) 23 Cal.App.5th 877, 884. Under this test, if a proposed project is not

03-8  
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City of Oceanside Modera Melrose  
 December 13, 2022  
 Page 10 of 16

exempt and may cause a significant effect on the environment, the lead agency must prepare an EIR. PRC, §§ 21100 (a), 21151; CEQA Guidelines, § 15064 (a)(1), (f)(1). An EIR may be dispensed with only if the lead agency finds no substantial evidence in the initial study or elsewhere in the record that the project may have a significant effect on the environment. *Parker Shattuck Neighbors v. Berkeley City Council* (2013) 222 Cal.App.4th 768, 785. In such a situation, the agency must adopt a negative declaration. PRC, § 21080, subd. (c)(1); CEQA Guidelines, §§ 15063 (b)(2), 15064(f)(3).

“Significant effect upon the environment” is defined as “a substantial or potentially substantial adverse change in the environment.” PRC, § 21068; CEQA Guidelines, § 15382. A project may have a significant effect on the environment if there is a reasonable probability that it will result in a significant impact. *No Oil, Inc.*, 13 Cal.3d at p. 83 fn. 16; see *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, 309. If any aspect of the project may result in a significant impact on the environment, an EIR must be prepared even if the overall effect of the project is beneficial. CEQA Guidelines, § 15063(b)(1); see *County Sanitation Dist. No. 2 v. County of Kern* (2005) 127 Cal.App.4th 1544, 1580.

This standard sets a “low threshold” for preparation of an EIR. *Consolidated Irrigation Dist. v. City of Selma* (2012) 204 Cal.App.4th 187, 207; *Nelson v. County of Kern* (2010) 190 Cal.App.4th 252; *Pocket Protectors v. City of Sacramento* (2004) 124 Cal.App.4th 903, 928; *Bowman v. City of Berkeley* (2004) 122 Cal.App.4th 572, 580; *Citizen Action to Serve All Students v. Thornley* (1990) 222 Cal.App.3d 748, 754; *Sundstrom*, 202 Cal.App.3d at p. 310. If substantial evidence in the record supports a fair argument that the project may have a significant environmental effect, the lead agency must prepare an EIR even if other substantial evidence before it indicates the project will have no significant effect. See *Jensen*, 23 Cal.App.5th at p. 886; *Clews Land & Livestock v. City of San Diego* (2017) 19 Cal.App.5th 161, 183; *Stanislaus Audubon Society, Inc. v. County of Stanislaus* (1995) 33 Cal.App.4th 144, 150; *Brentwood Assn. for No Drilling, Inc. v. City of Los Angeles* (1982) 134 Cal.App.3d 491; *Friends of “B” St.*, 106 Cal.App.3d 988; CEQA Guidelines, § 15064(f)(1)..

**B. The DEIR Defers Mitigations for Noise During Construction**

CEQA mitigation measures proposed and adopted into an environmental impact report are required to describe what actions that will be taken to reduce or avoid an environmental impact. CEQA Guidelines § 15126.4(a)(1)(B) (providing “[f]ormulation



03-8  
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03-9

City of Oceanside Modera Melrose  
 December 13, 2022  
 Page 11 of 16

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, but such exception is narrowly proscribed to situations where “measures may specify performance standards which would mitigate the significant effect of the project and which may be accomplished in more than one specified way.” (Id.) Courts have also recognized a similar exception to the general rule against deferral of mitigation measures where the performance criteria for each mitigation measure is identified and described in the EIR. *Sacramento Old City Ass’n v. City Council* (1991) 229 Cal.App.3d 1011.

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); *San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645, 671 (EIR failed to provide and commit to specific criteria or standard of performance for mitigating impacts to biological habitats); see also *Cleveland Nat’l Forest Found. v San Diego Ass’n of Gov’ts* (2017) 17 Cal.App.5th 413, 442 (generalized air quality measures in the EIR failed to set performance standards); *California Clean Energy Comm. v City of Woodland* (2014) 225 Cal.App.4th 173, 195 (agency could not rely on a future report on urban decay with no standards for determining whether mitigation required); *POET, LLC v. State Air Resources Bd.* (2013) 218 Cal.App.4th 681, 740 (agency could not rely on future rulemaking to establish specifications to ensure emissions of nitrogen oxide would not increase because it did not establish objective performance criteria for measuring whether that goal would be achieved); *Gray v. County of Madera* (2008) 167 Cal.App.4th 1099, 1119 (rejecting mitigation measure requiring replacement water to be provided to neighboring landowners because it identified a general goal for mitigation rather than specific performance standard); *Endangered Habitats League, Inc. v. County of Orange* (2005) 131 Cal.App.4th 777, 794 (requiring report without established standards is impermissible delay).

Here, the DEIR defers noise mitigations during construction. Rather than having a laid out plan for how it plans to reduce noise during construction, the mitigation measures under MM-NO1 require the applicant to submit a Construction Noise Management Plan. While the DEIR states some ideas such as administrative controls, engineering



03-9  
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03-10

City of Oceanside Modera Melrose  
December 13, 2022  
Page 12 of 16

controls and such, there are no specifics on exactly what is to be done. The DEIR should be recirculated with explanation on what it plans to do to mitigate noise during construction.

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C. The DEIR Fails to Mitigate for Traffic 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. PRC §§ 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” and find that “specific overriding economic, legal, social, technology or other benefits of the project outweigh the significant effects on the environment.” PRC § 21081(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.

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CEQA mitigation measures proposed and adopted into an environmental impact report must be enforceable and effective. CEQA Guidelines § 15126.4(a)(1)(B) and § 15126.4(a)(2). A reviewing court will not defer to the agency's determination that mitigation measures will work when their efficacy is not apparent and there is no evidence in the record showing they will be effective in remedying the identified environmental problem. *King & Gardiner Farms, LLC v County of Kern* (2020) 45 CA5th 814, 866. When the effectiveness of a mitigation measure is not apparent, the EIR should include facts and analysis supporting its characterization of the expected result. *Sierra Club v County of Fresno* (2018) 6 C5th 502, 522. Mitigation measures that are unrealistic and unlikely to be implemented create an illusory analysis and should not be included in an EIR. *Cleveland Nat'l Forest Found. v San Diego Ass'n of Gov'ts* (2017) 17 CA5th 413, 433.

Here, the DEIR does not do a VMT analysis despite the requirement for one for projects that are calculated to generation more than 1000 average daily trips. (“ADT”) The DEIR admits the project would generate more than 1000 ADT however fails to do a VMT analysis, instead claiming that the Project is consistent withing a Transit

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03-12

City of Oceanside Modera Melrose  
December 13, 2022  
Page 13 of 16

Priority Area. (“TPA”) According to the DEIR, projects located within a TPA must be able to access the transit station (within a ½ mile walking distance or 6 min walk continuously) without discontinuity of sidewalk or obstruction to the route. Qualifying transit stops require frequency of service of 15 minutes or less. However, the DEIR’s station it uses in this case, Melrose Drive Sprinter, runs with a frequency of 30 minutes. That is more than double the amount needed to qualify for a qualifying transit stop under the TPA. As such, the Project would not qualify for VMT exemption and the DEIR should be recirculated to address this deficiency.

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D. The DEIR Fails to Utilize All Feasible Mitigations for Air Quality

An EIR must identify describe mitigation a proposed project’s potentially significant environmental impacts. PRC § 21002.1(a); 21081(a)(1). A project’s environmental impacts must be mitigated to a less than significant level or at the least, adopt all feasible mitigation to avoid a project’s significant environmental impacts. PRC §§ 21002.1(b), 21081(a)91); CEQA Guidelines § 15021(a)(2 – 3), 15091(a)(1).

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Here, the DEIR states the VOC would exceed the SDAPCD threshold of 75 with 106.03 from architectural coating. The DEIR states that under MM-AQ1 it would lower the VOC from 106.03 to 64.62 and therefore be under the significance threshold. However, CEQA requires not only to have a less than significant impact but also requires adoption of all feasible measures as well. Here, there is only measure that has been adopted to lower the Project’s significant environmental impacts. However, there is no mention of whether other feasible mitigation measures are also possible to lower the VOC as well. The DEIR should be recirculated to address other feasible mitigation measures as well.

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E. The DEIR Fails to Demonstrate a Less than Significant Impact to Green House Gases

CEQA Guidelines § 15064.4 allow a lead agency to determine the significance of a project’s GHG impact via a qualitative analysis (e.g., extent to which a project complies with regulations or requirements of state/regional/local GHG plans), and/or a quantitative analysis (e.g., using model or methodology to estimate project emissions and compare it to a numeric threshold). So too, CEQA Guidelines allow lead agencies to select what model or methodology to estimate GHG emissions so long as the selection is supported with substantial evidence, and the lead agency “should explain

03-15

City of Oceanside Modera Melrose  
December 13, 2022  
Page 14 of 16

the limitations of the particular model or methodology selected for use.” CEQA Guidelines § 15064.4(c).

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Here, the DEIR includes both qualitative and quantitative analyses. However, the DEIR does not rely on any quantitative analysis to determine compliance with any numerical thresholds instead relies solely on consistency with the City’s Climate Action Plan (“CAP”) in making a determination that the Project’s GHG impacts are less than significant. The DEIR admits the total Project’s emissions is 2,604.30 MTCO<sub>2e</sub>, almost three times the bright-line threshold of 900 MTCO<sub>2e</sub>. The DEIR explains that because the Project exceeds the bright-line threshold, the Project is required to demonstrate consistency with the CAP consistency Checklist to ensure that the specific emissions targets identified in the City’s CAP can be achieved.

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However, simply following the City’s CAP consistency checklist does not guarantee that the GHG emissions would be less than significant. There is no follow-up to the information presented of what the MTCO<sub>2e</sub> would be after implementation of the City’s CAP checklist. As such, to claim the GHG would be less than significant is premature without any information determining so. The DEIR should be recirculated to address this.

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

**A. Background Regarding the State Planning and Zoning Law**

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

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

State law mandates two levels of consistency. First, a general plan must be internally or “horizontally” consistent: its elements must “comprise an integrated, internally consistent and compatible statement of policies for the adopting agency.” (See Gov.

City of Oceanside Modera Melrose  
December 13, 2022  
Page 15 of 16

Code § 65300.5; *Sierra Club v. Bd. of Supervisors* (1981) 126 Cal. App. 3d 698, 704.) A general plan amendment thus may not be internally inconsistent, nor may it cause the general plan as a whole to become internally inconsistent. See *DeVita*, 9 Cal. App. 4th at 796 fn. 12.

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

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

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

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

**V. CONCLUSION**

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

Sincerely,

  
\_\_\_\_\_  
Ronald Giang



03-17  
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03-18

City of Oceanside Modera Melrose  
December 13, 2022  
Page 16 of 16

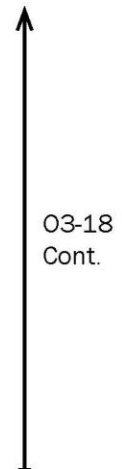
Attorneys for Southwest Mountain  
States Regional Council of Carpenters

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); and

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



03-18  
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**EXHIBIT A**



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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.

03-19

**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.”<sup>1</sup> 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.<sup>2</sup>

03-20

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.<sup>3</sup>

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

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

<sup>3</sup> “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](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.<sup>4</sup>

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

$$VMT_d = \sum(Average\ Daily\ Trip\ Rate_i * Average\ Overall\ Trip\ Length_i)_n$$

Where:

n = Number of land uses being modeled.<sup>5</sup>

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

$$Emissions_{pollutant} = VMT * EF_{running,pollutant}$$

Where:

Emissions<sub>pollutant</sub> = emissions from vehicle running for each pollutant

VMT = vehicle miles traveled

EF<sub>running,pollutant</sub> = emission factor for running emissions.<sup>6</sup>

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.<sup>7</sup> 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.<sup>8</sup> The default number of construction-related worker trips is calculated by multiplying the

<sup>4</sup> “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](http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6), p. 14-15.

<sup>5</sup> “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](http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6), p. 23.

<sup>6</sup> “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](http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6), p. 15.

<sup>7</sup> “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](http://www.aqmd.gov/docs/default-source/caleemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4), p. 34.

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

03-20  
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03-21

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.<sup>9</sup> 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.<sup>10</sup> Finally, the default worker trip length is consistent with the length of the operational home-to-work vehicle trips.<sup>11</sup> 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).<sup>12</sup>

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).<sup>13</sup>

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
<b>Average</b>	<b>16.47</b>	<b>11.17</b>
<b>Minimum</b>	<b>10.80</b>	<b>10.80</b>
<b>Maximum</b>	<b>19.80</b>	<b>14.70</b>
<b>Range</b>	<b>9.00</b>	<b>3.90</b>

03-21  
Cont.

<sup>9</sup> “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](http://www.aqmd.gov/docs/default-source/caleemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4), p. 34.

<sup>10</sup> “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](http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6), p. 15.

<sup>11</sup> “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](http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6), p. 14.

<sup>12</sup> “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](http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6), p. 21.

<sup>13</sup> “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](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.

03-21  
Cont.

**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.<sup>14</sup> 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).

03-22

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

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.

03-23

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.

<sup>14</sup> “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](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.

03-24

Sincerely,



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



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

03-25

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

03-25  
Cont.

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

03-25  
Cont.

<b>Worker Trip Length by Air Basin</b>		
<b>Air Basin</b>	<b>Rural (miles)</b>	<b>Urban (miles)</b>
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
<b>Average</b>	<b>16.47</b>	<b>11.17</b>
<b>Minimum</b>	<b>10.80</b>	<b>10.80</b>
<b>Maximum</b>	<b>19.80</b>	<b>14.70</b>
<b>Range</b>	<b>9.00</b>	<b>3.90</b>

03-25  
Cont.

**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**

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

**1.3 User Entered Comments & Non-Default Data**

03-26



Page 27 of 278 in Comment Letter O3

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

03-26  
Cont.

Page 28 of 278 in Comment Letter O3

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	6.83
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

03-26  
Cont.

2.0 Emissions Summary

Page 29 of 278 in Comment Letter O3

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	0.1713	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

O3-26  
Cont.

Page 30 of 278 in Comment Letter O3

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

2.1 Overall Construction

Mitigated Construction

Year	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
	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	1,721,682 <sub>3</sub>	1,721,682 <sub>3</sub>	0.1294	0.0000	1,724,918 <sub>3</sub>
2023	0.6148	3.3648	5.6747	0.0178	1.1963	0.0996	1.2959	0.3203	0.0935	0.4138	0.0000	1,627,529 <sub>1</sub>	1,627,529 <sub>1</sub>	0.1185	0.0000	1,630,492 <sub>1</sub>
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	1,721,682 <sub>3</sub>	1,721,682 <sub>3</sub>	0.1294	0.0000	1,724,918 <sub>3</sub>

	ROG	NOx	CO	SO2	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

O3-26  
Cont.

Page 31 of 278 in Comment Letter O3

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

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

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive 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
<b>Total</b>	<b>6.8692</b>	<b>9.5223</b>	<b>30.3407</b>	<b>0.0914</b>	<b>7.7979</b>	<b>0.2280</b>	<b>8.0240</b>	<b>2.0895</b>	<b>0.2219</b>	<b>2.3114</b>	<b>236.9712</b>	<b>12,294.1807</b>	<b>12,531.1519</b>	<b>15.7904</b>	<b>0.1260</b>	<b>12,963.4751</b>

O3-26  
Cont.

Page 32 of 278 in Comment Letter O3

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

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	7,620.4886	7,620.4886	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
<b>Total</b>	<b>6.8692</b>	<b>9.5223</b>	<b>30.3407</b>	<b>0.0914</b>	<b>7.7979</b>	<b>0.2280</b>	<b>8.0240</b>	<b>2.0895</b>	<b>0.2219</b>	<b>2.3114</b>	<b>236.9712</b>	<b>12,284.1807</b>	<b>12,531.1519</b>	<b>15.7904</b>	<b>0.1280</b>	<b>12,863.4751</b>
<b>Percent Reduction</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>

O3-26 Cont.

3.0 Construction Detail

Construction Phase

Page 33 of 278 in Comment Letter O3

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

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**

O3-26  
Cont.

Page 34 of 278 in Comment Letter O3

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

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**

03-26  
Cont.

Page 35 of 278 in Comment Letter O3

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

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

3.1 Mitigation Measures Construction

3.2 Demolition - 2021

Unmitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive 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
<b>Total</b>	<b>0.0475</b>	<b>0.4716</b>	<b>0.3235</b>	<b>5.8000e-004</b>	<b>0.0496</b>	<b>0.0233</b>	<b>0.0729</b>	<b>7.5100e-003</b>	<b>0.0216</b>	<b>0.0291</b>	<b>0.0000</b>	<b>51.0012</b>	<b>51.0012</b>	<b>0.0144</b>	<b>0.0000</b>	<b>51.3601</b>

O3-26  
Cont.

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

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
<b>Total</b>	<b>2.9000e-003</b>	<b>0.0641</b>	<b>0.0233</b>	<b>2.0000e-004</b>	<b>6.4100e-003</b>	<b>2.1000e-004</b>	<b>6.6200e-003</b>	<b>1.7300e-003</b>	<b>2.0000e-004</b>	<b>1.9300e-003</b>	<b>0.0000</b>	<b>19.6816</b>	<b>19.6816</b>	<b>1.2800e-003</b>	<b>0.0000</b>	<b>19.7136</b>

**Mitigated Construction On-Site**

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

O3-26  
Cont.

Page 37 of 278 in Comment Letter O3

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

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
<b>Total</b>	<b>2.9000e-003</b>	<b>0.0641</b>	<b>0.0233</b>	<b>2.0000e-004</b>	<b>6.4100e-003</b>	<b>2.1000e-004</b>	<b>6.6200e-003</b>	<b>1.7300e-003</b>	<b>2.0000e-004</b>	<b>1.9300e-003</b>	<b>0.0000</b>	<b>19.6816</b>	<b>19.6816</b>	<b>1.2800e-003</b>	<b>0.0000</b>	<b>19.7136</b>

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
<b>Total</b>	<b>0.0389</b>	<b>0.4050</b>	<b>0.2115</b>	<b>3.8000e-004</b>	<b>0.1807</b>	<b>0.0204</b>	<b>0.2011</b>	<b>0.0993</b>	<b>0.0188</b>	<b>0.1181</b>	<b>0.0000</b>	<b>33.4357</b>	<b>33.4357</b>	<b>0.0108</b>	<b>0.0000</b>	<b>33.7061</b>

O3-26  
Cont.

Page 38 of 278 in Comment Letter O3

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

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
<b>Total</b>	<b>7.7000e-004</b>	<b>6.0000e-004</b>	<b>6.8100e-003</b>	<b>2.0000e-005</b>	<b>1.9700e-003</b>	<b>2.0000e-005</b>	<b>1.9900e-003</b>	<b>5.2000e-004</b>	<b>1.0000e-005</b>	<b>5.4000e-004</b>	<b>0.0000</b>	<b>1.7801</b>	<b>1.7801</b>	<b>5.0000e-005</b>	<b>0.0000</b>	<b>1.7814</b>

**Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.1807	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
<b>Total</b>	<b>0.0389</b>	<b>0.4050</b>	<b>0.2115</b>	<b>3.8000e-004</b>	<b>0.1807</b>	<b>0.0204</b>	<b>0.2011</b>	<b>0.0993</b>	<b>0.0188</b>	<b>0.1181</b>	<b>0.0000</b>	<b>33.4357</b>	<b>33.4357</b>	<b>0.0108</b>	<b>0.0000</b>	<b>33.7060</b>

O3-26  
Cont.

Page 39 of 278 in Comment Letter O3

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

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
<b>Total</b>	<b>7.7000e-004</b>	<b>6.0000e-004</b>	<b>6.8100e-003</b>	<b>2.0000e-005</b>	<b>1.9700e-003</b>	<b>2.0000e-005</b>	<b>1.9900e-003</b>	<b>5.2000e-004</b>	<b>1.0000e-005</b>	<b>5.4000e-004</b>	<b>0.0000</b>	<b>1.7801</b>	<b>1.7801</b>	<b>5.0000e-005</b>	<b>0.0000</b>	<b>1.7814</b>

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
<b>Total</b>	<b>0.0796</b>	<b>0.8816</b>	<b>0.5867</b>	<b>1.1800e-003</b>	<b>0.1741</b>	<b>0.0377</b>	<b>0.2118</b>	<b>0.0693</b>	<b>0.0347</b>	<b>0.1040</b>	<b>0.0000</b>	<b>103.5405</b>	<b>103.5405</b>	<b>0.0335</b>	<b>0.0000</b>	<b>104.3776</b>

03-26 Cont.

Page 40 of 278 in Comment Letter O3

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

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
<b>Total</b>	<b>1.6400e-003</b>	<b>1.2700e-003</b>	<b>0.0144</b>	<b>4.0000e-005</b>	<b>4.1600e-003</b>	<b>3.0000e-005</b>	<b>4.2000e-003</b>	<b>1.1100e-003</b>	<b>3.0000e-005</b>	<b>1.1400e-003</b>	<b>0.0000</b>	<b>3.7579</b>	<b>3.7579</b>	<b>1.1000e-004</b>	<b>0.0000</b>	<b>3.7607</b>

**Mitigated Construction On-Site**

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

O3-26 Cont.

Page 41 of 278 in Comment Letter O3

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

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
<b>Total</b>	<b>1.6400e-003</b>	<b>1.2700e-003</b>	<b>0.0144</b>	<b>4.0000e-005</b>	<b>4.1600e-003</b>	<b>3.0000e-005</b>	<b>4.2000e-003</b>	<b>1.1100e-003</b>	<b>3.0000e-005</b>	<b>1.1400e-003</b>	<b>0.0000</b>	<b>3.7579</b>	<b>3.7579</b>	<b>1.1000e-004</b>	<b>0.0000</b>	<b>3.7607</b>

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	0.0233	0.0000	19.0871	19.0871	6.1700e-003	0.0000	19.2414
<b>Total</b>	<b>0.0127</b>	<b>0.1360</b>	<b>0.1017</b>	<b>2.2000e-004</b>	<b>0.0807</b>	<b>5.7200e-003</b>	<b>0.0865</b>	<b>0.0180</b>	<b>5.2600e-003</b>	<b>0.0233</b>	<b>0.0000</b>	<b>19.0871</b>	<b>19.0871</b>	<b>6.1700e-003</b>	<b>0.0000</b>	<b>19.2414</b>

O3-26  
Cont.

Page 42 of 278 in Comment Letter O3

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

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
<b>Total</b>	<b>2.8000e-004</b>	<b>2.1000e-004</b>	<b>2.4400e-003</b>	<b>1.0000e-005</b>	<b>7.7000e-004</b>	<b>1.0000e-005</b>	<b>7.7000e-004</b>	<b>2.0000e-004</b>	<b>1.0000e-005</b>	<b>2.1000e-004</b>	<b>0.0000</b>	<b>0.6679</b>	<b>0.6679</b>	<b>2.0000e-005</b>	<b>0.0000</b>	<b>0.6684</b>

**Mitigated Construction On-Site**

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

O3-26  
Cont.

Page 43 of 278 in Comment Letter O3

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

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

03-26  
Cont.

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

Page 44 of 278 in Comment Letter O3

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

**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
<b>Total</b>	<b>0.4616</b>	<b>2.0027</b>	<b>3.9895</b>	<b>0.0152</b>	<b>1.2243</b>	<b>0.0121</b>	<b>1.2363</b>	<b>0.3278</b>	<b>0.0112</b>	<b>0.3390</b>	<b>0.0000</b>	<b>1,408.7952</b>	<b>1,408.7952</b>	<b>0.0530</b>	<b>0.0000</b>	<b>1,410.1208</b>

**Mitigated Construction On-Site**

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

03-26  
Cont.

Page 45 of 278 in Comment Letter O3

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

**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
<b>Total</b>	<b>0.4616</b>	<b>2.0027</b>	<b>3.9895</b>	<b>0.0152</b>	<b>1.2243</b>	<b>0.0121</b>	<b>1.2363</b>	<b>0.3278</b>	<b>0.0112</b>	<b>0.3390</b>	<b>0.0000</b>	<b>1,408.7952</b>	<b>1,408.7952</b>	<b>0.0530</b>	<b>0.0000</b>	<b>1,410.1208</b>

**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
<b>Total</b>	<b>0.1942</b>	<b>1.7765</b>	<b>2.0061</b>	<b>3.3300e-003</b>		<b>0.0864</b>	<b>0.0864</b>		<b>0.0813</b>	<b>0.0813</b>	<b>0.0000</b>	<b>286.2789</b>	<b>286.2789</b>	<b>0.0681</b>	<b>0.0000</b>	<b>287.9814</b>

03-26  
Cont.

Page 46 of 278 in Comment Letter O3

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

**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
<b>Total</b>	<b>0.4135</b>	<b>1.5218</b>	<b>3.5707</b>	<b>0.0144</b>	<b>1.1953</b>	<b>9.8700e-003</b>	<b>1.2051</b>	<b>0.3200</b>	<b>9.1400e-003</b>	<b>0.3282</b>	<b>0.0000</b>	<b>1,327.3369</b>	<b>1,327.3369</b>	<b>0.0462</b>	<b>0.0000</b>	<b>1,328.4916</b>

**Mitigated Construction On-Site**

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

03-26  
Cont.

Page 47 of 278 in Comment Letter O3

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

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
<b>Total</b>	<b>0.4135</b>	<b>1.5218</b>	<b>3.5707</b>	<b>0.0144</b>	<b>1.1953</b>	<b>9.8700e-003</b>	<b>1.2051</b>	<b>0.3200</b>	<b>9.1400e-003</b>	<b>0.3292</b>	<b>0.0000</b>	<b>1,327,336.9</b>	<b>1,327,336.9</b>	<b>0.0462</b>	<b>0.0000</b>	<b>1,328,491.6</b>

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
<b>Total</b>	<b>6.7100e-003</b>	<b>0.0663</b>	<b>0.0948</b>	<b>1.5000e-004</b>		<b>3.3200e-003</b>	<b>3.3200e-003</b>		<b>3.0500e-003</b>	<b>3.0500e-003</b>	<b>0.0000</b>	<b>13.0175</b>	<b>13.0175</b>	<b>4.2100e-003</b>	<b>0.0000</b>	<b>13.1227</b>

O3-26  
Cont.

Page 48 of 278 in Comment Letter O3

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

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
<b>Total</b>	<b>3.7000e-004</b>	<b>2.7000e-004</b>	<b>3.1200e-003</b>	<b>1.0000e-005</b>	<b>1.0700e-003</b>	<b>1.0000e-005</b>	<b>1.0800e-003</b>	<b>2.8000e-004</b>	<b>1.0000e-005</b>	<b>2.9000e-004</b>	<b>0.0000</b>	<b>0.8963</b>	<b>0.8963</b>	<b>2.0000e-005</b>	<b>0.0000</b>	<b>0.8968</b>

**Mitigated Construction On-Site**

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

O3-26 Cont.

Page 49 of 278 in Comment Letter O3

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

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
<b>Total</b>	<b>3.7000e-004</b>	<b>2.7000e-004</b>	<b>3.1200e-003</b>	<b>1.0000e-005</b>	<b>1.0700e-003</b>	<b>1.0000e-005</b>	<b>1.0800e-003</b>	<b>2.8000e-004</b>	<b>1.0000e-005</b>	<b>2.9000e-004</b>	<b>0.0000</b>	<b>0.8963</b>	<b>0.8963</b>	<b>2.0000e-005</b>	<b>0.0000</b>	<b>0.8968</b>

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	5.1500e-003	4.7400e-003	4.7400e-003	4.7400e-003	0.0000	22.0292	22.0292	7.1200e-003	0.0000	22.2073
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>	<b>0.0109</b>	<b>0.1048</b>	<b>0.1609</b>	<b>2.5000e-004</b>	<b>5.1500e-003</b>	<b>5.1500e-003</b>	<b>5.1500e-003</b>	<b>4.7400e-003</b>	<b>4.7400e-003</b>	<b>4.7400e-003</b>	<b>0.0000</b>	<b>22.0292</b>	<b>22.0292</b>	<b>7.1200e-003</b>	<b>0.0000</b>	<b>22.2073</b>

O3-26  
Cont.

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

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
<b>Total</b>	<b>5.9000e-004</b>	<b>4.1000e-004</b>	<b>4.9200e-003</b>	<b>2.0000e-005</b>	<b>1.8100e-003</b>	<b>1.0000e-005</b>	<b>1.8200e-003</b>	<b>4.8000e-004</b>	<b>1.0000e-005</b>	<b>4.9000e-004</b>	<b>0.0000</b>	<b>1.4697</b>	<b>1.4697</b>	<b>4.0000e-005</b>	<b>0.0000</b>	<b>1.4706</b>

**Mitigated Construction On-Site**

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

O3-26 Cont.

Page 51 of 278 in Comment Letter O3

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

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
<b>Total</b>	<b>5.9000e-004</b>	<b>4.1000e-004</b>	<b>4.9200e-003</b>	<b>2.0000e-005</b>	<b>1.8100e-003</b>	<b>1.0000e-005</b>	<b>1.8200e-003</b>	<b>4.8000e-004</b>	<b>1.0000e-005</b>	<b>4.9000e-004</b>	<b>0.0000</b>	<b>1.4697</b>	<b>1.4697</b>	<b>4.0000e-005</b>	<b>0.0000</b>	<b>1.4706</b>

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
<b>Total</b>	<b>4.1404</b>	<b>0.0213</b>	<b>0.0317</b>	<b>5.0000e-005</b>		<b>1.0700e-003</b>	<b>1.0700e-003</b>		<b>1.0700e-003</b>	<b>1.0700e-003</b>	<b>0.0000</b>	<b>4.4682</b>	<b>4.4682</b>	<b>2.5000e-004</b>	<b>0.0000</b>	<b>4.4745</b>

O3-26  
Cont.

Page 52 of 278 in Comment Letter O3

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

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
<b>Total</b>	<b>0.0101</b>	<b>6.9900e-003</b>	<b>0.0835</b>	<b>2.8000e-004</b>	<b>0.0307</b>	<b>2.3000e-004</b>	<b>0.0309</b>	<b>8.1500e-003</b>	<b>2.2000e-004</b>	<b>8.3700e-003</b>	<b>0.0000</b>	<b>24.9407</b>	<b>24.9407</b>	<b>6.1000e-004</b>	<b>0.0000</b>	<b>24.9558</b>

Mitigated Construction On-Site

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

O3-26 Cont.

Page 53 of 278 in Comment Letter O3

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

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
<b>Total</b>	<b>0.0101</b>	<b>6.9900e-003</b>	<b>0.0835</b>	<b>2.8000e-004</b>	<b>0.0307</b>	<b>2.3000e-004</b>	<b>0.0309</b>	<b>8.1500e-003</b>	<b>2.2000e-004</b>	<b>8.3700e-003</b>	<b>0.0000</b>	<b>24.9407</b>	<b>24.9407</b>	<b>6.1000e-004</b>	<b>0.0000</b>	<b>24.9558</b>

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

03-26  
Cont.

Page 54 of 278 in Comment Letter O3

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

	ROG	NOx	CO	SO2	Fugitive 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

03-26  
Cont.

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated Annual VMT	Mitigated Annual VMT
	Weekday	Saturday	Sunday		
Apartments Low Rise	145.75	154.25	154.00	506,227	506,227
Apartments Mid Rise	4,026.75	3,773.25	4,075.50	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	2,817.72	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
<b>Total</b>	<b>8,050.95</b>	<b>8,164.43</b>	<b>8,057.31</b>	<b>20,552,452</b>	<b>20,552,452</b>

4.3 Trip Type Information

Page 55 of 278 in Comment Letter O3

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

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-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	89.00	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

O3-26  
Cont.

Page 56 of 278 in Comment Letter O3

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

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

O3-26  
Cont.

Page 57 of 278 in Comment Letter O3

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

5.2 Energy by Land Use - Natural Gas

Unmitigated

	Natural Gas 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	6.4000e-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
<b>Total</b>		<b>0.1398</b>	<b>1.2312</b>	<b>0.7770</b>	<b>7.6200e-003</b>		<b>0.0966</b>	<b>0.0966</b>		<b>0.0966</b>	<b>0.0966</b>	<b>0.0000</b>	<b>1,383.4268</b>	<b>1,383.4268</b>	<b>0.0265</b>	<b>0.0254</b>	<b>1,391.6478</b>

03-26 Cont.

Page 58 of 278 in Comment Letter 03

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

5.2 Energy by Land Use - Natural Gas

Mitigated

	Natural Gas 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	6.4000e-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
<b>Total</b>		<b>0.1398</b>	<b>1.2312</b>	<b>0.7770</b>	<b>7.6200e-003</b>		<b>0.0966</b>	<b>0.0966</b>		<b>0.0966</b>	<b>0.0966</b>	<b>0.0000</b>	<b>1,383.4268</b>	<b>1,383.4268</b>	<b>0.0265</b>	<b>0.0254</b>	<b>1,391.6478</b>

03-26 Cont.

Page 59 of 278 in Comment Letter 03

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

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	1,257,587.9	0.0519	0.0107	1,262,086.9
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	650308	175.3399	7.2400e-003	1.6000e-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
<b>Total</b>		<b>2,512.6465</b>	<b>0.1037</b>	<b>0.0215</b>	<b>2,521.6356</b>

O3-26  
Cont.

Page 60 of 278 in Comment Letter O3

**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
<b>Total</b>		<b>2,512.8465</b>	<b>0.1037</b>	<b>0.0215</b>	<b>2,521.6356</b>

**6.0 Area Detail**

**6.1 Mitigation Measures Area**

O3-26  
Cont.

Page 61 of 278 in Comment Letter O3

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

	ROG	NOx	CO	SO2	Fugitive 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
<b>Total</b>	<b>5.1437</b>	<b>0.2950</b>	<b>10.3804</b>	<b>1.6600e-003</b>		<b>0.0714</b>	<b>0.0714</b>		<b>0.0714</b>	<b>0.0714</b>	<b>0.0000</b>	<b>220.9670</b>	<b>220.9670</b>	<b>0.0201</b>	<b>3.7400e-003</b>	<b>222.5835</b>

03-26  
Cont.

Page 62 of 278 in Comment Letter O3

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

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
<b>Total</b>	<b>5.1437</b>	<b>0.2950</b>	<b>10.3804</b>	<b>1.8600e-003</b>		<b>0.0714</b>	<b>0.0714</b>		<b>0.0714</b>	<b>0.0714</b>	<b>0.0000</b>	<b>220.9670</b>	<b>220.9670</b>	<b>0.0201</b>	<b>3.7400e-003</b>	<b>222.5835</b>

7.0 Water Detail

7.1 Mitigation Measures Water

03-26  
Cont.

Page 63 of 278 in Comment Letter O3

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

	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

O3-26  
Cont.



Page 64 of 278 in Comment Letter O3

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	63,6252 / 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
<b>Total</b>		<b>585,8052</b>	<b>3,0183</b>	<b>0,0755</b>	<b>683,7567</b>

O3-26  
Cont.

Page 65 of 278 in Comment Letter O3

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 / 40.0465	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
<b>Total</b>		<b>585.8052</b>	<b>3.0183</b>	<b>0.0755</b>	<b>683.7567</b>

8.0 Waste Detail

8.1 Mitigation Measures Waste

O3-26  
Cont.

Page 66 of 278 in Comment Letter O3

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

O3-26  
Cont.

Page 67 of 278 in Comment Letter O3

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	226.5513
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
<b>Total</b>		<b>207.8079</b>	<b>12.2811</b>	<b>0.0000</b>	<b>514.8354</b>

O3-26  
Cont.

Page 68 of 278 in Comment Letter O3