

# Appendix A

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Notice of Preparation and Initial Study

DEPARTMENT OF  
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## NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT AND NOTICE OF SCOPING MEETING FOR THE CITYWIDE HOUSING ELEMENT 2021-2029 UPDATE AND SAFETY ELEMENT UPDATE

**TO:** Agencies, Organizations, and Interested Parties

**DATE:** January 13, 2021

The City of Los Angeles is the Lead Agency under the California Environmental Quality Act (CEQA) and will prepare an Environmental Impact Report (EIR) for a project involving updates to the City of Los Angeles General Plan, including the Housing Element, as well as associated necessary updates to the Safety Element to comply with State law (“Housing Element Update” or “Project”). The proposed Housing Element Update establishes programs, policies and actions to further the goal of meeting the existing and projected housing needs of all income levels of the community, provides evidence of the City’s ability to accommodate the Regional Housing Needs Assessment (RHNA) allocation through the year 2029, as established by the Southern California Association of Governments (SCAG), and identifies a rezoning program needed to reach the required housing capacity. The Project also includes necessary updates to the Safety Element, which are triggered under State law upon the update to the Housing Element. More details on the Project are provided below.

The City is requesting identification of environmental issues, environmental impacts, and information that you or your organization believes needs to be considered and analyzed in the EIR, including environmental impacts, mitigation measures, and alternatives.

### NOTICE OF SCOPING MEETING

Pursuant to California Public Resources Code Section 21083.9 and California Code of Regulations, Title 14, Chapter 3 (“CEQA Guidelines”) Section 15082(c)(1), the Lead Agency will conduct two public scoping meetings for the purpose of soliciting written comments from interested parties requesting notice, responsible agencies, agencies with jurisdiction by law, trustee agencies, transportation agencies, and involved federal agencies, as to the appropriate scope and content of the EIR.

The Public Scoping Meetings will be held in an online format using GoToWebinar, to share information regarding the Project and the environmental review process, and provide information on how interested parties can provide written comments. City staff and environmental consultants will be available during this meeting which will begin with a pre-recorded presentation with options

in both English and Spanish. The City is holding two Public Scoping Meetings; however, the content presented will be the same at both meetings. After the Public Scoping Meeting has ended, a copy of the prerecorded presentation will be posted to the Department's website at <https://planning.lacity.org/development-services/eir/housing-element-2021-2029-update-safety-element-update>.

The City encourages all interested individuals and organizations to attend this meeting. Questions may be submitted in English or Spanish via the 'Questions' chat box in the control panel, but there will be no verbal comments or public testimony taken at the Public Scoping Meeting. Interested parties wishing to provide comments or public testimony should provide them in writing, as described under "Submittal of Written Comments," below. No decisions about the Project will be made at the Public Scoping Meeting. A separate public hearing for the update to the City of Los Angeles General Plan will be scheduled after the completion of the EIR. The date, time, and virtual location of the Public Scoping Meetings are as follows:

### **SCOPING MEETING DATES**

*Note: content presented will be the same at both meetings.*

<b>Date:</b>	January 26, 2021	<b>Date:</b>	January 28, 2021
<b>Time:</b>	5:15 PM – 6:30 PM	<b>Time:</b>	11:15 AM – 12:30 PM
<b>Place:</b>	Virtual Meeting Visit <a href="https://joinwebinar.com">joinwebinar.com</a> and enter webinar ID and email address	<b>Place:</b>	Virtual Meeting Visit <a href="https://joinwebinar.com">joinwebinar.com</a> and enter webinar ID and email address
<b>Webinar ID:</b>	733-042-203 (English) 248-966-475 (Spanish)	<b>Webinar ID:</b>	715-621-491 (English) 679-132-603 (Spanish)

**ACCOMMODATIONS:** As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate. Closed captioning or other assistive services may be provided upon request. Other services, such as translation between English and other languages, may also be provided upon request. To ensure availability of services, please make your request no later than three working days (72 hours) prior to the meeting by contacting Cally Hardy at (213) 978-1643 or [cally.hardy@lacity.org](mailto:cally.hardy@lacity.org).

### **RESPONSIBLE AND TRUSTEE AGENCIES**

The City requests your agency's views on the scope and content of the environmental information relevant to your agency's statutory responsibilities in connection with the Project, in accordance with the CEQA Guidelines, Section 15082(b). Your agency will need to use the EIR prepared by the City when considering any permits or other project approvals that your agency must issue. As such, your responses to this Notice of Preparation (NOP), at a minimum should identify: (1) the significant environmental issues and reasonable alternatives and mitigation measures that your agency will need to have explored in the EIR; and (2) whether your agency will be a responsible or trustee agency for this Project.

### **REVIEW AND RESPONSE PERIOD**

January 13, 2021 to February 15, 2021

Pursuant to CEQA Guidelines Section 15082(b), responses to this NOP must be provided during this response period.

## **PROJECT LOCATION**

The Los Angeles Citywide Housing Element 2021-2029 Update, Safety Element Update, and rezone program (hereafter referred to as the “Housing Element Update” or “Project”) will apply to the entire geographic area located within the boundaries of the City of Los Angeles (City), which encompasses 467 square miles. Figure 1 shows the boundaries of the City within the southern California region.

## **PROJECT BACKGROUND**

The Housing Element is one of the eight State-mandated elements of the General Plan and identifies the City’s housing conditions and needs, establishes the goals, objectives, and policies that are the foundation of the City’s housing strategy, and provides an array of programs to create sustainable, mixed-income neighborhoods across the City.

The Housing Element Law, enacted in 1969, mandates that local governments adequately plan to meet the existing and projected housing needs of all economic segments of the community through the preparation of a Housing Element. The law requires local governments to adopt land use plans and regulatory systems that provide opportunities for, and do not unduly constrain, housing development. The law requires the update of the Housing Element every eight years. The Housing Element Update will establish new policies, goals, and programs for the City to accommodate the City’s required housing needs allocation as determined by the Department of Housing and Community Development (HCD) and the Southern California Association of Governments (SCAG) in the Regional Housing Needs Assessment (RHNA). The Update to the Housing Element is required to be adopted by October 15, 2021 and will be in effect through October 2029.

Housing Element law also requires that HCD review local Housing Elements for compliance with State law and report written findings to the local government. The City expects to submit the Draft Housing Element to HCD in the summer of 2021. Following release of the Draft Housing Element, HCD will provide comments to the City, which will be incorporated in a revised Housing Element that will be submitted to HCD by no later than October 15, 2021.

The Safety Element is one of the eight State-mandated elements of the General Plan. The purpose of the update to the Safety Element is to comply with recent State legislation and guidelines (such as Senate Bill 2141, Assembly Bill 162, Senate Bill 99, Assembly Bill 747, Senate Bill 1035 and Senate Bill 379). Technical amendments will be made to the Safety Element to achieve compliance with State, regional and local policies and guidelines. The technical amendments will incorporate data and maps, address vulnerability to climate change; incorporate policies and programs from the City’s updates to the Local Hazard Mitigation Plan and the Floodplain Management Plan, as well as partial or full integration of other recent city documents (including but limited to: Resilient Los Angeles, LA’s Green New Deal / 2019 Sustainability Plan and the Emergency Management Department Emergency Plans and Annexes). The Safety Element amendments will be submitted to the California Geological Survey, California Office of Emergency Services, California State Board of Forestry and Fire Protection, and Federal Emergency Management Agency for review.

## **PROJECT DESCRIPTION**

The Project involves state mandated updates to the Housing Element of the City of Los Angeles General Plan to generally further the goal of meeting the existing and projected housing needs of all income levels of the community, and specifically to demonstrate compliance by documenting adequate sites to accommodate the RHNA allocation through the year 2029, as established by SCAG. As of September 3, 2020, the City’s Draft RHNA Allocation is 455,577 units. SCAG is

expected to issue the final RHNA Allocation in February 2021, pending the completion of the RHNA appeals process; however, the City does not anticipate a significant change to the RHNA Allocation as a result of that process.

In order to ensure compliance with State law, the City anticipates amending the Safety Element to formally integrate related long-range planning efforts, such as the Local Hazard Mitigation Plan, and to address recently adopted State requirements pertaining to climate change and wildfire. Technical revisions to related General Plan Elements, including but not limited to the Plan for a Healthy LA and Framework Element, may be required to ensure consistency with the updated Housing Element and new State law requirements pertaining to the Safety Element and Environmental Justice Element.

Under State Housing Element law, the Project is required to identify an inventory of land suitable for residential development (“Opportunity Sites”) that can be developed during the eight-year planning period to accommodate the RHNA Allocation by income category (“Sites Inventory”). The City is not required to physically construct the 455,577-unit RHNA Allocation, but must demonstrate adequate zoning capacity. The Opportunity Sites are selected based on criteria established in state law regarding the adequacy and suitability of zoning, development standards, and infrastructure capacity needed to accommodate new housing development (GC §65583.2). The number of unit capacity assigned to each Opportunity Site is based on what can be realistically accommodated on each site and must consider impediments to the development of non-vacant sites.

The Project will analyze the reasonable “worst case” scenario of environmental impacts from future implementation of the Housing Element 2021-2029, which is the full build-out of the City’s RHNA Allocation. The most substantial potential impact under this approach relates to the potential construction and operation of between 419,261 and 429,261 housing units, which represents the City’s current Draft RHNA Allocation of 455,577 units, less the 36,316 already approved pipeline housing units expected to receive a certificate of occupancy (COO) during the sixth cycle. The high end of the range reflects a 10,000-unit buffer, to account for potential increases to the final RHNA Allocation figure. The RHNA Allocation represents the City’s housing goal over the eight-year planning period. Considering the production of between 419,261 to 429,261 units is intended to provide an analysis of the reasonable worst-case scenario with respect to environmental impacts associated with future implementation of the Housing Element 2021-2029.

Construction of these 419,261 to 429,261 housing units may occur anywhere in the City where residential uses are permitted, as described below. While many units are anticipated to be built on the Opportunity Sites required to be identified in the Sites Inventory, it is not reasonable to expect that housing development will occur solely on those Opportunity Sites. Housing may occur on a wide variety of sites, including any site that is currently zoned for residential use; whereas the Opportunity Sites are subject to a number of requirements to demonstrate the suitability and realistic likelihood of development of each site. Housing may also occur on sites that do not currently allow residential uses or multi-family residential uses of adequate density, including sites that will be rezoned in the future under a Housing Element rezoning implementation program (Re-Zoned Sites). The rezoning program will need to be completed by 2024 and will likely be accomplished through updates to the City’s Community Plans, an update to the City’s Density Bonus program, targeted zone changes and zoning ordinances, and updates to specific plans and overlays. The rezoning program will prioritize opportunities for rezoning or development incentives in areas that are located in a Transit Priority Area, near major job centers, and in higher resource areas.

The anticipated 419,261 to 429,261 units may occur in types of development such as multi-family residential, single-family residential, Accessory Dwelling Units (ADUs), mixed use development, and conversion and/or rehabilitation of existing nonresidential, residential, and mixed used structures. In addition, these units may occur on sites currently zoned for residential use, commercial use which permit residential uses, hybrid industrial uses which permit joint live-work residential uses, non-vacant sites, sites with existing housing units, as well as publicly owned sites, sites designated as having potential historical or environmental significance, and sites that may be rezoned as a result of the rezoning program.

### Project Objectives

The underlying purpose of the Project is to comply with all State Housing Element laws.

The primary objectives of the Project will be to:

- Accommodate the RHNA through the Sites Inventory and applicable rezoning program.
- Expand access to opportunity. This may include revisions to existing objectives, policies and implementation programs that promote housing development near transit and jobs centers, to also include a priority for housing development (and in particular, affordable housing development) in higher resource areas.<sup>1</sup>
- Prevent displacement and promote housing stability. This will include additional policies and programs to assist tenants facing eviction as well as programs to expand tenant protections and new or revised programs to preserve and replace existing affordable and RSO housing. This will also include a program to comply with new housing replacement requirements for the Inventory of Sites (Government Code Section 65583.2(g)(3)).
- Promote climate and disaster resiliency, sustainability, and Environmental Justice.
- Promote homeless prevention and diversion while expanding access to shelter and housing for persons experiencing homelessness.
- Coordinate housing regulation and design to increase access to amenities that support public health and wellbeing.
- Promote the provision of housing that meets the needs of special needs populations in the City, including but not limited to: seniors, seniors with disabilities, people with disabilities, large families (5 or more persons), single female-headed households, people living with HIV/AIDS, people experiencing homelessness, and transition-aged youth.
- Result in reduced vehicle trips by promoting a jobs-housing balance.

### **ISSUES TO BE ADDRESSED IN THE EIR**

Based on the project description and the Lead Agency's understanding of the environmental issues associated with the proposed Project, based on the Initial Study prepared for the Project, the Project is anticipated to have probable impacts in the following topic areas which will be analyzed in the EIR:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials

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<sup>1</sup> As defined by the California Tax Credit Allocation/California Department of Housing and Community Development Opportunity Maps, which can be accessed at <https://www.treasurer.ca.gov/ctcac/opportunity.asp>.

- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems

The EIR will analyze the reasonably foreseeable direct and indirect physical changes to the environment in the above topic areas caused by the proposed Project, including the updates to the Housing Element and Safety Element.

The Hazards and Hazardous Materials section of the Draft EIR will discuss the potential impacts associated with housing development on sites identified as hazardous materials sites, known as the Cortese List, pursuant to Government Code Section 65962.5. Because the Housing Element Update and Safety Element Update are Citywide, thousands of sites are within the Project area. Interested parties can research individual sites using the various resources found at the following links:

<https://calepa.ca.gov/sitecleanup/corteselist/> or <https://www.epa.gov/enviro/sems-search>.

Alternatives to be analyzed in the EIR are to be defined and analyzed consistent with the requirements of CEQA Guidelines, Section 15126.6. The specific alternatives to be evaluated will include a “No Project” alternative, as required by CEQA, and may include land use configurations.

#### **DOCUMENT AVAILABILITY**

The Notice of Preparation, along with the Initial Study, can be viewed on the City of Los Angeles Department of City Planning website at: <https://planning.lacity.org/development-services/eir/housing-element-2021-2029-update-safety-element-update>.

To request to make an appointment to view a hard copy of the documents, please contact Cally Hardy at (213) 978-1643 or [housingelement@lacity.org](mailto:housingelement@lacity.org).

#### **SUBMITTAL OF WRITTEN COMMENTS**

The Lead Agency solicits comments regarding the scope, content and specificity of the EIR from all interested parties requesting notice, responsible agencies, agencies with jurisdiction by law, trustee agencies, and involved agencies. Please send written/typed comments (including a name, telephone number, and contact information) to the following:

City of Los Angeles, Department of City Planning  
 ATTN: Cally Hardy, City Planning Associate  
 Case Numbers: CPC-2020-1365-GPA; ENV-2020-6762-EIR  
 200 N. Spring Street, Room 750, Los Angeles, CA 90012

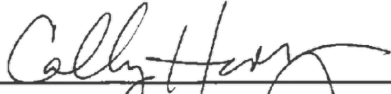
Phone: (213) 978-1643

E-mail: [housingelement@lacity.org](mailto:housingelement@lacity.org)

In accordance with CEQA Guidelines Section 15082, this Notice of Preparation is being circulated for a 30-day comment period. **The City of Los Angeles requests that written comments be provided at the earliest possible date, but no later than 5:00 p.m. on February 15, 2021.**

For more information about the Housing Element 2021-2029 Update, please visit <https://planning.lacity.org/plans-policies/housing-element-update>

**ALL INTERESTED PARTIES ARE INVITED TO ATTEND THE PUBLIC SCOPING MEETING TO ASSIST IN IDENTIFYING ISSUES TO BE ADDRESSED IN THE EIR. ATTENDEES WILL HAVE AN OPPORTUNITY TO PROVIDE INPUT TO THE CONSULTANTS PREPARING THE EIR.**



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Cally Hardy, City Planning Associate  
City of Los Angeles Department of City Planning

Attachment:

Figure 1: Citywide Map



**Figure 1 Citywide Map**

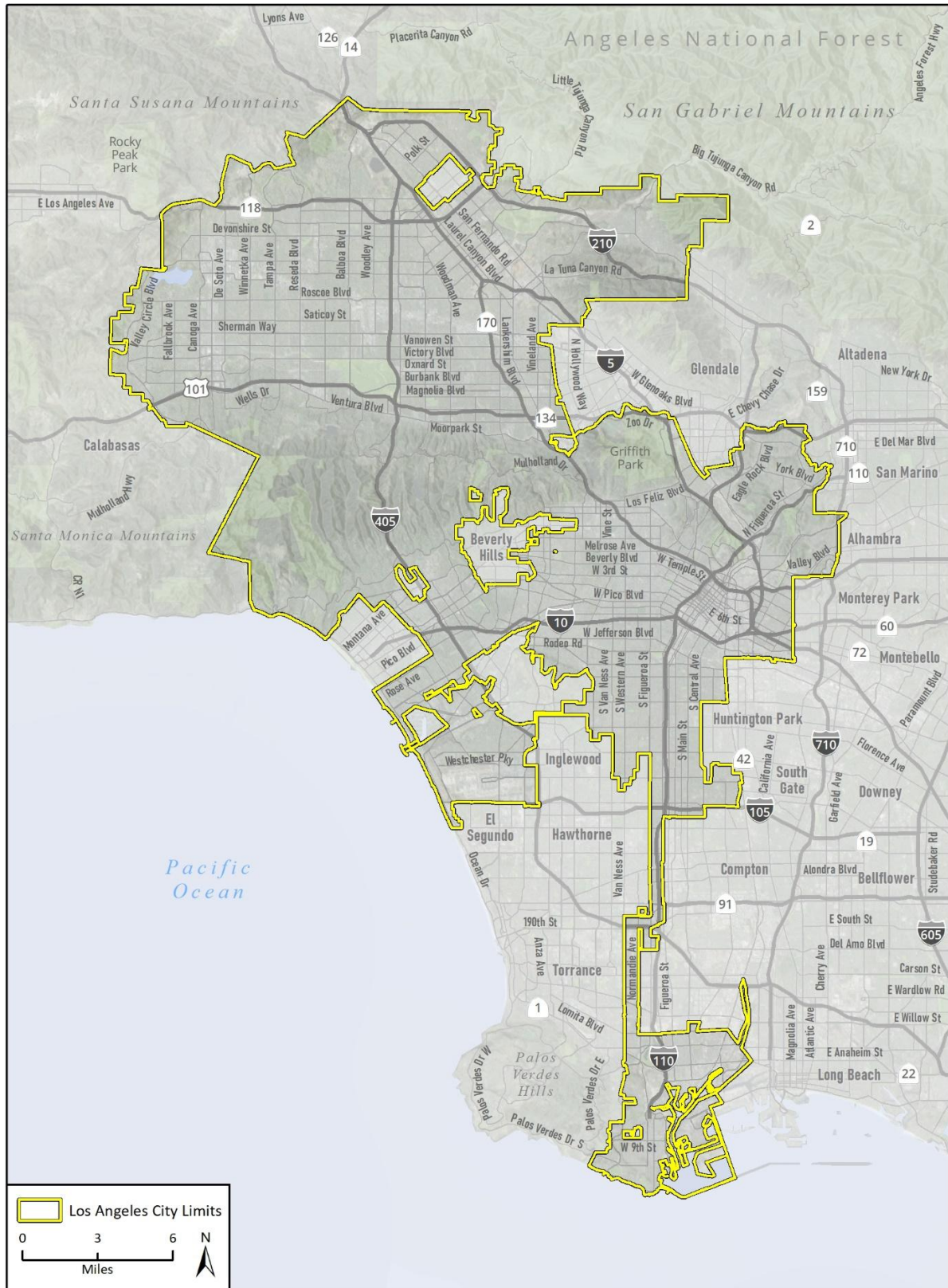


Fig 1 Regional Location



# Los Angeles Citywide Housing Element 2021-2029 Update

Initial Study

*prepared by*

**Los Angeles Department of City Planning**  
200 North Spring Street, Room 750  
Los Angeles, California 90012

*prepared with the assistance of*

**Rincon Consultants, Inc.**  
250 East 1<sup>st</sup> Street, Suite 1400  
Los Angeles, California 90012

**January 2021**



**RINCON CONSULTANTS, INC.**

Environmental Scientists | Planners | Engineers

[rinconconsultants.com](http://rinconconsultants.com)

# Los Angeles Citywide Housing Element 2021-2029 Update

Initial Study

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200 North Spring Street, Room 750  
Los Angeles, California 90012

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Los Angeles, California 90012

**January 2021**



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Environmental Scientists | Planners | Engineers

[rinconconsultants.com](http://rinconconsultants.com)

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# Initial Study

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The proposed project involves an update to the Housing Element of the City of Los Angeles General Plan. The proposed Housing Element Update establishes programs, policies and actions to further the goal of meeting the existing and projected housing needs of all family income levels of the community, provides evidence of the City’s ability to accommodate the Regional Housing Needs Assessment (RHNA) allocation through the year 2029, as established by the Southern California Association of Governments (SCAG), and identifies any rezoning program needed to reach the required housing capacity. The proposed project also includes necessary updates to the Safety Element triggered under State law by an update to the Housing Element.

This project description focuses on the key policies and programs in the Housing Element that have the potential to result in physical environmental impacts and describes the required updates to the Safety Element.

Case Numbers:       CPC-2020-1365-GPA  
                          ENV-2020-6762-EIR

## 1. Project Applicant

City of Los Angeles, Department of City Planning  
200 North Spring Street, Room 750  
Los Angeles, California 90012

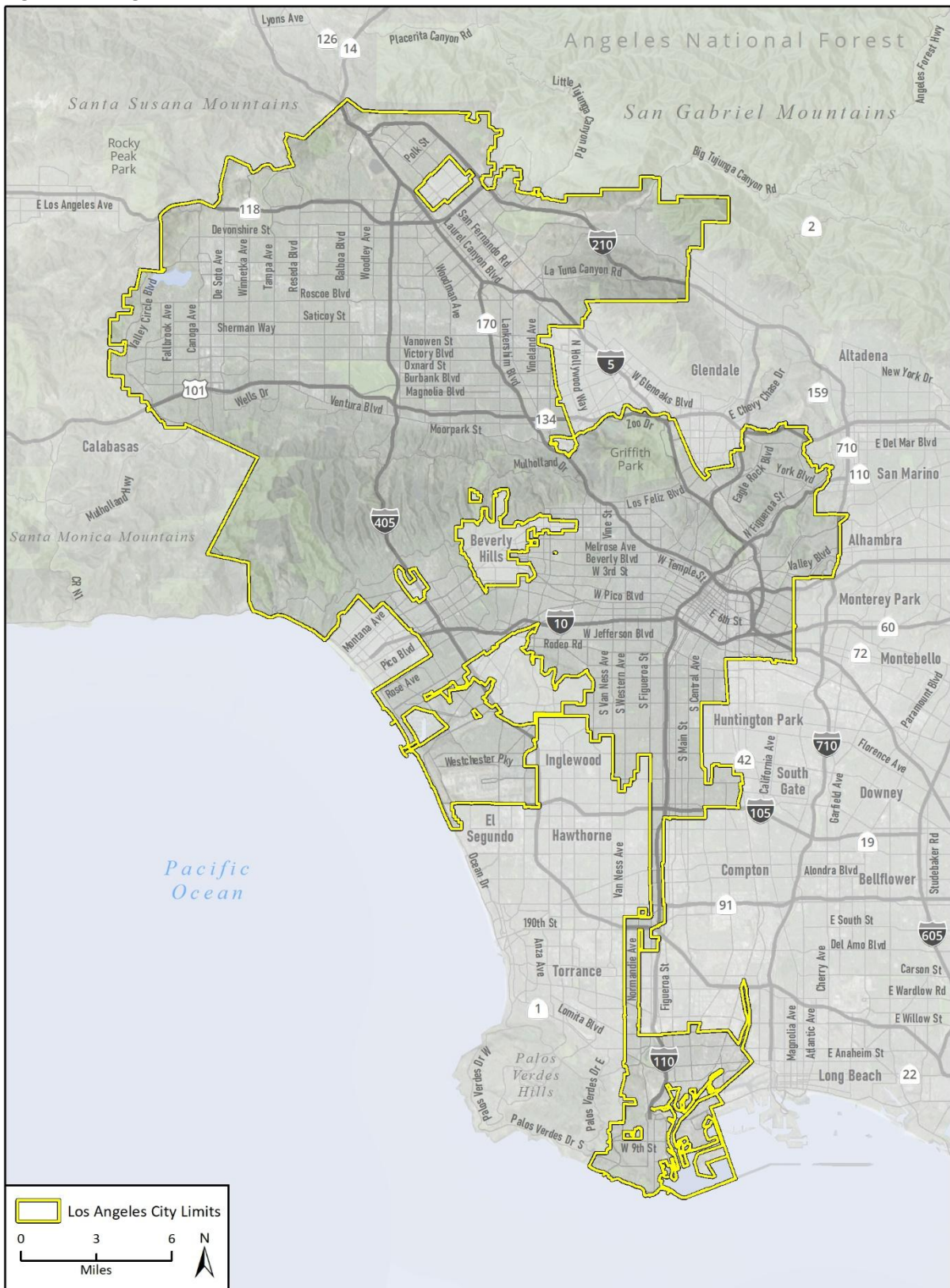
## 2. Lead Agency Contact Person

Cally Hardy, City Planning Associate  
City of Los Angeles, Department of City Planning  
200 North Spring Street, Room 750  
Los Angeles, California 90012  
(213) 978-1643

## 3. Project Location

The Los Angeles Citywide Housing Element 2021-2029 Update, Safety Element Update, and Rezoning Program (hereafter referred to as “Housing Element Update” or “proposed project”) would apply to the entire geographic area located within the boundaries of the City of Los Angeles (City), which encompasses 467 square miles. Figure 1 shows the boundaries of the City within the southern California region.

Figure 1 Regional Location





## 4. Background

### Housing Element Law

The Housing Element is one of the eight State-mandated elements of the General Plan. The Housing Element identifies the City's housing conditions and needs, establishes the goals, objectives, and policies that are the foundation of the City's housing strategy, and provides an array of programs to create sustainable, mixed-income neighborhoods across the City.

The City's current Housing Element was adopted on December 3, 2013. The element set forth an action plan covering the planning period from 2013 to 2021. The Housing Element identifies the City's housing conditions and needs; reiterates goals, objectives, and policies that are the foundation of the City's housing and growth strategy; and provides the array of programs the City has committed to implement to create sustainable, mixed-income neighborhoods across the City.

The Housing Element Law, enacted in 1969, mandates that local governments adequately plan to meet the existing and projected housing needs of all economic segments of the community through the preparation of a Housing Element. The law requires local governments to adopt land use plans and regulatory systems that provide opportunities for, and do not unduly constrain, housing development. The law requires the update of the Housing Element every eight years to reflect the most recent trends in demographics and employment. Pursuant to these requirements, the City of Los Angeles is required to update the Housing Element. The Housing Element Update would establish new policies, goals and programs for the City to accommodate the City's required housing needs allocation as determined by SCAG in the RHNA. The Housing Element Update is required to be adopted by October 15, 2021 and will be in effect through October 2029.

The Housing Element Law also requires that the Department of Housing and Community Development (HCD) review local housing elements for compliance with State law and report written findings to the local government. The City expects to submit the draft Housing Element to HCD in the summer of 2021. Following release of the draft Housing Element, HCD will provide comments to the City, which will be incorporated in a revised Housing Element that will be submitted to HCD by no later than October 15, 2021.

This study analyzes the programs and policies contained in the draft Housing Element that have the potential to result in physical environmental effects, the Inventory of Sites and Rezoning Program needed to demonstrate zoned capacity needed to accommodate the City's RHNA allocation, in addition to the construction and operation of between 419,261 and 429,261 housing units, which is intended to provide a conservative analysis of the "worst-case" scenario of environmental impacts from future implementation of the 2021-2029 Housing Element (see *Proposed Project* section of this introduction).

Since the adoption of the 2013-2021 Housing Element, the California State Legislature adopted several key bills that imposed additional requirements on the Housing Element Update. These recent changes are summarized as follows.

### *Affirmatively Furthering Fair Housing (AB 686)*

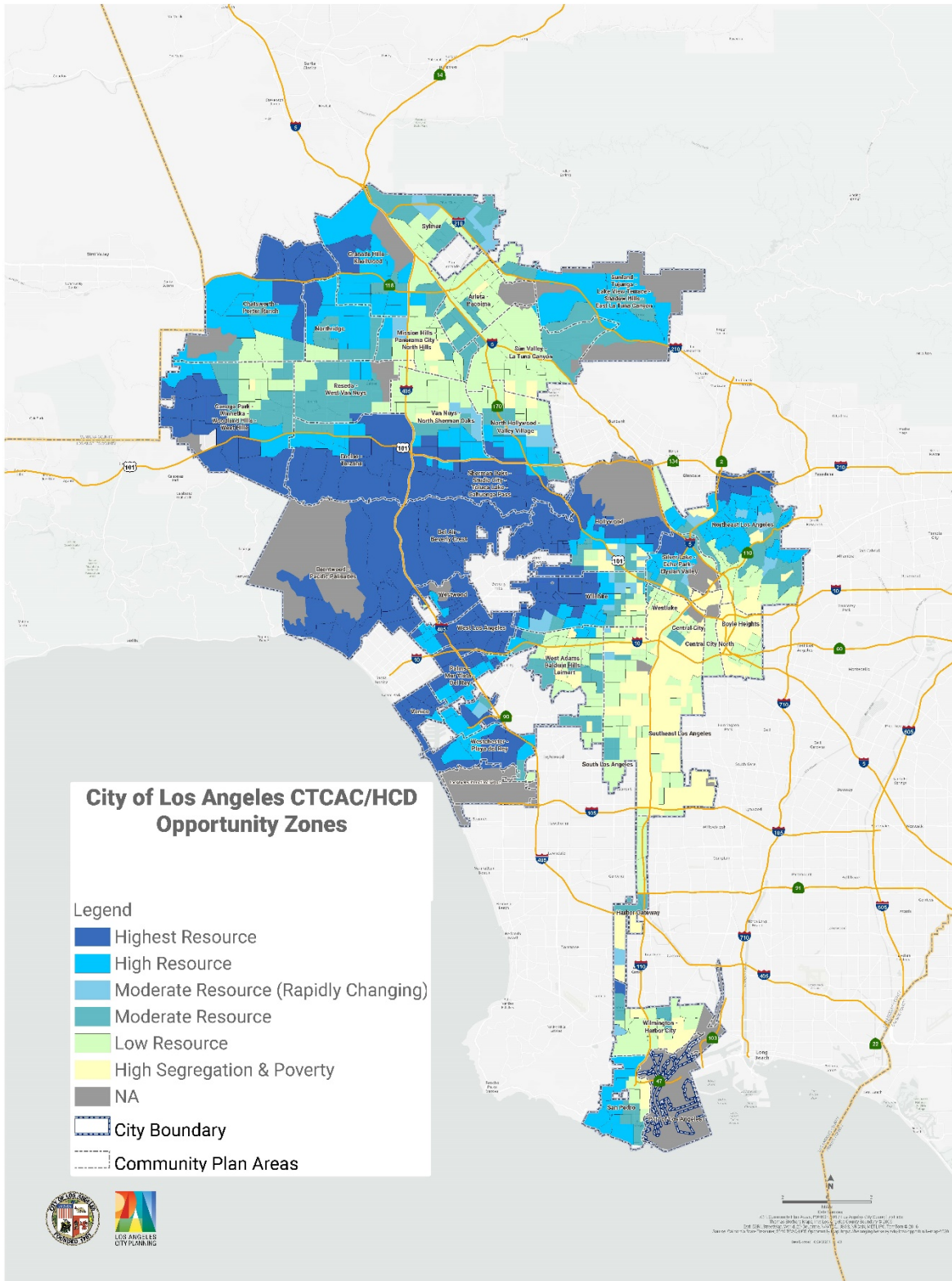
Pursuant to Assembly Bill (AB) 686 (2018), the Housing Element must include an analysis and determination of consistency with Affirmatively Furthering Fair Housing (AFFH) requirements. AFFH means “taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. These actions must, when taken together, address significant disparities in housing needs and in access to opportunity, replace segregated living patterns with truly integrated and balanced living patterns, transform racially and ethnically concentrated areas of poverty into areas of opportunity, and foster and maintain compliance with civil rights and fair housing laws.

To comply with these requirements, the implementation programs of the Housing Element must affirmatively further fair housing and must include an assessment of fair housing. The City currently has an adopted Assessment of Fair Housing (AFH) plan (adopted in 2017) and anticipates an update to the AFH to be adopted in 2022. Additionally, the Inventory of Sites suitable for housing development must be identified throughout the City in a manner that affirmatively furthers fair housing opportunities.

For purposes of the housing element site inventory, this means that sites identified to accommodate the lower-income portion of the RHNA are not concentrated in low-resourced areas (lack of access to high performing schools, proximity to jobs, location disproportionately exposed to pollution or other health impacts) or areas of segregation and concentrations of poverty. Sites identified to accommodate the lower income RHNA must be distributed throughout the community in a manner that affirmatively furthers fair housing.

To conduct this analysis, the City will utilize the California Tax Credit Allocation Committee (TCAC)/California Department of Housing and Community Development (HCD) Opportunity Maps, which is shown in Figure 2 and can be accessed at <https://www.treasurer.ca.gov/ctcac/opportunity.asp>.

Figure 2 TCAC/HCD Opportunity Map, City of Los Angeles



### ***Additional Requirements Related to the Inventory of Sites (AB 1397 and SB 166)***

Since the 5<sup>th</sup> cycle Housing Element was adopted in 2013, the State Legislature has adopted several bills which strengthened requirements related to the Inventory of Sites. Among these, the most significant are AB 1397 (2017) and SB 166 (2017), which imposed several key new requirements. These new requirements are summarized as follows.

#### *Enhanced Requirements: Realistic Development Potential (AB 1397)*

Assembly Bill 1397 requires that, for each site included in the inventory, the City identify the realistic development potential for the site within the eight-year planning period. For non-vacant sites, the methodology used to identify realistic development potential must consider factors such as existing uses, past development trends, market conditions, and the availability of regulatory and/or other development incentives.

Additionally, for jurisdictions such as Los Angeles where non-vacant sites are used to accommodate 50 percent or more of the lower-income RHNA allocation, the non-vacant site's existing use is presumed to impede additional residential development, unless the Housing Element describes findings based on substantial evidence that the use will likely be discontinued during the planning period.

#### *No Net Loss (SB 166)*

Senate Bill 166 amended existing No Net Loss Law to require sufficient adequate sites to be available at all times throughout the Housing Element planning period to meet a jurisdiction's remaining unmet RHNA goals for each income category. To comply with the No Net Loss Law, as jurisdictions make decisions regarding zoning and land use, or development occurs, jurisdictions must assess their ability to accommodate new housing in each income category on the remaining sites in their housing element site inventories. A jurisdiction must add additional sites to its inventory if land use decisions or development results in a shortfall of sufficient sites to accommodate its remaining housing need for each income category. In particular, a jurisdiction may be required to identify additional sites according to the No Net Loss Law if a jurisdiction rezones a site or if the jurisdiction approves a project at a different income level or lower density than shown in the sites inventory. Lower density means fewer units than the capacity assumed in the site inventory.

To ensure that sufficient capacity exists in the housing element to accommodate the RHNA throughout the planning period, HCD recommends that jurisdiction create a buffer in the housing element inventory of at least 15 to 30 percent more capacity than required, especially for capacity to accommodate the lower income RHNA. Jurisdictions can also create a buffer by projecting site capacity at less than the maximum density to allow for some reductions in density at a project level.

*Rezoning for Re-Use of Sites to Accommodate Lower Income RHNA (20 percent inclusionary, By-right)*

Sites identified to accommodate the lower-income RHNA are subject to additional requirements if they were identified in a previous planning period. Generally, these requirements would apply to the use of non-vacant site that was identified in the prior planning period's housing element (i.e., 5<sup>th</sup> cycle Housing Element), or to the use of a vacant site that was identified in two or more consecutive planning periods (i.e., 5<sup>th</sup> and 4<sup>th</sup> cycle Housing Elements).

When sites meeting these conditions are used to accommodate the lower-income RHNA, the jurisdiction's Housing Element must include a program to be completed within three years of the beginning of the planning period to allow residential use by right at specified densities (in Los Angeles, the minimum required density is 30 dwelling units per acre [du/acre]) for housing developments in which at least 20 percent of the units are affordable to lower income households. Sites where zoning already permits residential "use by right" as set forth in Government Code Section 65583.2 (i) at the beginning of the planning period would be considered to meet this requirement.

*Replacement Requirements*

Government Code Section 65583.2(g)(3) now requires that the Housing Element include a program to impose housing replacement requirements on certain sites identified in the Inventory of Sites. These replacement requirements would require the replacement of units affordable to the same or lower income level as a condition of any development on a non-vacant site consistent with those requirements set forth in State Density Bonus Law (Government Code Section 65915(c)(3).)

The housing replacement requirements would be required for sites identified in the Inventory of Sites that currently have residential uses, or within the past five years<sup>1</sup> have had residential uses that have been vacated or demolished, and:

- Were subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of low or very low-income, or
- Subject to any other form of rent or price control through a public entity's valid exercise of its police power, or
- Occupied by low or very low-income households.

*Required Rezoning to Accommodate Shortfall*

If, after completing the Inventory of Sites, the City concludes that there is a shortfall of sites to accommodate the RHNA allocation, then the Housing Element must include a program to identify sites that can be rezoned during the planning period. For any shortfall of sites to accommodate the lower-income RHNA, the Housing Element is required to include an

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<sup>1</sup> For the purpose of this program "previous five years" is based on the date the application for development was submitted.

inventory of potential sites for rezoning, and those sites must meet the adequate sites requirements in terms of suitability and availability.

Sites identified to meet the rezoning need for a lower-income shortfall must comply with a set of specific parameters, including the requirement that the site:

- Permit owner-occupied and rental multi-family uses by right for developments in which 20 percent or more of the units are affordable to lower income households.
- Permit the development of at least 16 units per site.
- Permit a minimum of 20 du/ac.<sup>2</sup>
- Ensure a) at least 50 percent of the shortfall of low- and very low-income regional housing need can be accommodated on sites designated for exclusively residential uses, or b) if accommodating more than 50 percent of the low- and very low-income regional housing need on sites designated for mixed-uses, all sites designated for mixed-uses must allow 100 percent residential use and require residential use to occupy at least 50 percent of the floor area in a mixed-use project.

The requirements to identify an inventory of sites for rezoning within the Housing Element Programs do not apply to rezonings that may be required to accommodate a Moderate Income or Above Moderate Income RHNA shortfall. Following the adoption of the Housing Element, jurisdictions have three years to adopt the rezonings, with some ability for extensions based on specific criteria. For the City of Los Angeles, these rezonings must be completed and adopted by October 2024, but specific sites do not need to be identified in the Housing Element.

*Additional Requirements Related to the General Plan – AB 162 (2007), SB 1241 (2012), SB 99 (2019), AB 747 (2019), SB 1035 (2018), SB 379 (2015), and SB 1000 (2016)*

Several recent state laws require the City to make updates to other sections of the General Plan alongside the update to the Housing Element. These laws place a particular emphasis on the Safety Element, with an expanded focus on planning for flooding, wildfires, and climate change impacts. More detail on updates to the Safety Element is described in *Description of Safety Element Update*. Additionally, SB 1000 expands requirements surrounding Environmental Justice. Many of these requirements are met through LA’s existing Environmental Justice Element, the Plan for a Healthy LA, but minor amendments may be necessary to ensure full compliance.

## **RHNA Allocation**

The RHNA is mandated by State law as part of the periodic process of updating local housing elements of the General Plan. The RHNA allocation process begins with a regional determination figure (the total number of housing units needed to meet housing needs in the SCAG region) issued by HCD, followed by an allocation to each jurisdiction within the region

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<sup>2</sup> Sites within metropolitan jurisdictions, as defined by Government Code Section 65583.2(c)(3)(B)(iii) and (iv), must permit a minimum of 20 du/acre. In Los Angeles, a minimum density of 20 du/acre is equivalent to the density permitted in the RD2 zone. Sites rezoned to the RD2, RD1.5, R3, R4, R5 and Commercial zones would satisfy this requirement.

(specific number of units allocated to each jurisdiction). In prior Housing Element cycles, the regional determination figure was based solely on projected housing need during an eight-year planning period. Recent changes to State law added a requirement that existing housing need must be incorporated in the regional determination by considering housing need indicators such as vacancy rates, jobs/housing balance, cost burden, and overcrowding.

On October 15, 2019, HCD issued a final regional determination of 1,341,827 units to the SCAG region for the 6<sup>th</sup> cycle. The total regional allocation accounts for “projected need” within the region (about 506,000 housing units) and “existing need” within the region (about 836,000 housing units). The new existing need component is the primary reason the RHNA allocation is much larger for the 6<sup>th</sup> cycle than for past cycles, and largely reflects housing production needed to accommodate the needs of the existing population within the SCAG region.

SCAG is responsible for preparing the RHNA allocation methodology, which allocates the overall regional allocation (1.34 million housing units) among all SCAG jurisdictions based on the need for housing within each jurisdiction during specified planning periods, as well as other statutory requirements. The main factors included in the allocation methodology are household growth (based on the Connect SoCal, or SCAG Regional Transportation Plan/Sustainable Communities Strategy [RTP/SCS] growth forecast), job accessibility, transit accessibility, and socioeconomic conditions. The current RHNA projection period covers an eight-year period from October 2021 to October 2029.

The RHNA allocation is determined by a number of factors. SCAG estimates the future population within each jurisdiction based upon State Department of Finance projections and knowledge of circumstances particular to the region. The population change is then converted into housing units necessary to accommodate projected population increases. This estimate includes a vacancy rate that reflects a “healthy” housing market, and replacement of existing units that may have been demolished. The estimate of housing needs is then divided into four groups based on income: very-low, low, moderate, and above moderate income based on the income characteristics of the community. Table 1 shows the current draft RHNA allocation<sup>3</sup> required for the City of Los Angeles by household income group.

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<sup>3</sup> Based on September 3, 2020 Draft Allocation. The final allocation is anticipated in February 2021.

**Table 1 City of Los Angeles Draft RHNA Allocation**

Income Level	Number of Units
Very Low Income*	115,680
Low Income*	68,590
Moderate Income	74,936
Above Moderate Income	196,368
Total RHNA Allocation	455,577

\*All Very Low Income and Low Income units must be accommodated on sites with a density of at least 30 du/acre<sup>4</sup>

Under the RHNA allocation, the City is required to provide the zoned capacity to accommodate the development of at least 455,577 residential units using various land use planning strategies. The City provides capacity for housing through local zoning regulations. The City, however, is not required to physically construct 455,577 units as a result of the RHNA allocation.

***Targeted Capacity for Inventory of Sites***

It is possible that, as a result of the final RHNA adoption and appeals process, the City’s final RHNA allocation is slightly different from the draft allocation.<sup>5</sup> In addition, as discussed in *Housing Element Law*, state law implicitly requires a sufficient buffer in the Inventory of Sites to accommodate future reductions in the sites identified for affordable housing as they are developed with another use during the eight-year cycle. When this occurs, the City must demonstrate that there are adequate remaining sites to accommodate the affordable units that had previously been identified for that site or face further rezoning requirements.

To ensure that sufficient capacity exists in the housing element to accommodate the RHNA throughout the planning period, HCD recommends that jurisdictions identify a buffer of between 15-30 percent over the required allocation, particularly for the lower-income allocation, for the purposes of creating the inventory of sites. The City intends to accommodate a 25 percent buffer in excess of the 184,270 unit lower-income RHNA allocation, for a total target capacity of 230,338 units for lower-income households.

<sup>4</sup> A minimum density of 30 du/acre is equivalent to the density permitted in the R3 zone. Sites located in the R3, R4, R5 and Commercial zones would meet this requirement.

<sup>5</sup> Based on the State mandate to approve the Housing Element by October 2021, the need for the City to prepare an EIR for the proposed project, and the time it takes to prepare and circulate a Draft EIR and prepare a Final EIR, the City cannot wait to receive the final RHNA allocation numbers to issue the NOP and start the EIR preparation process.



For these reasons, the City’s Inventory of Sites will target identifying a capacity of at least 501,642 units, of which at approximately 230,338 will be accommodated on sites with a density of 30 du/acre or greater.<sup>6</sup> Table 2 below shows the City’s targeted capacity by income category.

**Table 2 City of Los Angeles Target Housing Capacity by Income Category**

Income Level	Number of Units
Very Low Income*	144,600
Low Income*	85,738
Moderate Income	74,936
Above Moderate Income	196,368
Target Capacity	501,642

\*All Very Low Income and Low Income units must be accommodated on sites with a density of at least 30 du/acre. The targeted number of units shown in this table includes a 25 percent buffer above the draft RHNA allocation for these income categories.

## 5. Description of the Housing Element Update

### Summary of Housing Element Update

Most components of the Housing Element are incorporated to meet the requirements under State law for compliant housing elements. The proposed project will include an update to the following six components of the Housing Element:

1. **Housing Needs Assessment** - Provides a comprehensive overview of the City’s population, household, and housing stock characteristics, and an analysis of these factors in order to identify housing needs of the variety of household types and special needs across the City. New for the 6<sup>th</sup> cycle and consistent with the AFFH mandate imposed by AB 686, this component will include a detailed analysis of segregation/integration patterns and disparities in access to opportunity.
2. **Constraints on Housing Maintenance, Improvement, and Development** - Identifies and addresses regulations and conditions that constitute constraints to housing production and preservation, including governmental and nongovernmental regulations, infrastructure requirements and market conditions such as land, construction and labor costs as well as restricted financing availability. New for the 6<sup>th</sup> cycle, this component will also identify and address constraints caused by opposition to housing.

<sup>6</sup> This 230,338 number is based on the City’s draft RHNA allocation for 184,270 lower-income units, plus a 25 percent buffer of 46,068 units.

3. **Inventory of Sites for Housing** - State housing element law requires the City to show that it has adequate land zoned to accommodate the existing and projected need for housing reflected in the 2021-2029 RHNA allocation. The City's Draft RHNA allocation is 455,577 units, more than five times larger than it was in the previous cycle. In addition, as discussed in *Housing Element Law*, recent changes to state law have established more onerous criteria for site selection to demonstrate adequate zoning capacity that can accommodate the RHNA allocation. As a result, the City anticipates a need to identify a program to rezone some parcels as part of the Project in order to meet state requirements. See additional assumptions in *Description of the Housing Element Update* regarding the Inventory of Sites and Rezoning Program.
4. **Opportunities for Conservation in Residential Development** - State housing element law requires cities to identify opportunities for energy conservation in residential development. The City has broadened this analysis to include energy conservation, water conservation, alternative energy sources and sustainable development which supports conservation and reduces demand.
5. **Review of the 2013-2021 Housing Element** - Preparation of the Housing Element Update will include the essential step of evaluating the previous 2013-2021 Housing Element in order to identify progress and evaluate the effectiveness of previous policies and programs.
6. **Housing Goals, Policies, Objectives and Programs** - The objectives, policies and implementation programs under each goal lay out the City's approach to alleviating housing needs. These tools aim to create sustainable mixed-use, mixed-income neighborhoods across the City and to provide opportunities for housing, jobs, transit, and basic amenities for all segments of the population. Some goals, policies, objectives, and/or programs may be revised, removed, or added to better reflect current housing challenges and priorities, add clarity and consistency, as well as to comply with new state requirements, as discussed in *Housing Element Law*. These revisions will largely restate and refine existing goals, objectives, policies and programs but are likely to include an added focus or emphasis on goals, policies, objectives and programs that do the following:
  - a. Accommodate the RHNA through the Sites Inventory and applicable rezoning program.
  - b. Expand access to opportunity. This may include revisions to existing objectives, policies and implementation programs that promote housing development near transit and jobs centers, to also include a priority for housing development (and in particular, affordable housing development) in higher resource areas.<sup>7</sup>
  - c. Prevent displacement and promote housing stability. This will include additional policies and programs to assist tenants facing eviction as well as programs to expand tenant protections and new or revised programs to preserve and replace existing affordable and Rent Stabilization Ordinance (RSO) housing. This will also

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<sup>7</sup> As defined by the TCAC/HCD Opportunity Maps, which can be accessed at <https://www.treasurer.ca.gov/ctcac/opportunity.asp>.

- include a program to comply with new housing replacement requirements for the Inventory of Sites (Government Code Section 65583.2(g)(3)).
- d. Promote climate and disaster resiliency, sustainability and Environmental Justice.
  - e. Promote homeless prevention and diversion while expanding access to shelter and housing for persons experiencing homelessness.
  - f. Coordinate housing regulation and design to increase access to amenities that support public health and wellbeing.
  - g. Promote the provision of housing that meets the needs of special needs populations in the City, including but not limited to: seniors, seniors with disabilities, people with disabilities, large families (five or more persons), single female-headed households, people living with HIV/AIDS, people experiencing homelessness, and transition-aged youth.
  - h. Result in reduced vehicle trips by promoting a jobs-housing balance.

In addition, the Housing Element will include a summary of historic housing and land use practices in the City, as well as a study of historical land use patterns.

## **Inventory of Sites**

### ***Background***

Under Housing Element law, the City must show that it has adequate land zoned to accommodate the entirety of its 2021-2029 RHNA allocation of 455,577 units. Of these units, a total of 184,273 units must accommodate the City's lower-income RHNA, which means they must be identified on multi-family-zoned sites that have a minimum density of 30 du/acre, or in the R3 or a less restrictive zone. In addition, the Inventory of Sites must demonstrate compliance with AB 686 by incorporating an analysis of how the sites are consistent with AFFH goals.

As stated above, the City is anticipating the need to identify some buffer in the Inventory of Sites. The City intends to identify a total capacity of 501,642 units. Of these, the City anticipates identifying 230,338 lower income units on sites that have a minimum density of 30 du/ac.

Recent changes to state Housing Element law have strengthened requirements related to the Inventory of Sites. In particular, AB 1397 (2017) requires that, for each site included in the inventory, the City identify the realistic development potential for the site within the eight-year planning period. For non-vacant sites, the methodology used to identify realistic development potential must consider factors such as existing uses, past development trends, market conditions, and the availability of regulatory and/or other development incentives.

### ***Anticipated Capacity and Realistic Development Potential***

There are a number of new factors that make it difficult to estimate the anticipated zoned capacity and realistic development potential that will be identified in the 6<sup>th</sup> cycle Housing Element. Based on a preliminary review of remaining available sites from the 5<sup>th</sup> cycle Housing

Element Inventory of Sites, there is existing identified capacity ranging from 285,411 to 461,222 units;<sup>8</sup> however, due to the new requirements to demonstrate realistic development potential that is likely to occur during the eight-year planning period, it is anticipated that the realistic capacity demonstrated on these sites will be diminished. The City is currently in the process of developing the proposed methodology to identify the anticipated capacity and realistic development potential. In order to meet the state-mandated deadline for adoption of the Housing Element, the City's environmental review will rely on a conservative estimate of the potential outcome of that methodology. The methodology and basis for that estimate are described as follows.

*Proposed Methodology for Housing Element Inventory of Sites*

To comply with the new State requirements, the City intends to develop an econometric model to identify realistic development potential and demonstrate zoned capacity. The results of this model will be applied to potential sites that are zoned to permit residential development, in order to determine the realistic development potential during the eight-year planning period (2021-2029).

The model would use eight years of past housing development permits to estimate the amount of new housing that was actually produced during that period given planned capacity. The difference between current planned capacity on a site and existing housing on the site would serve as a baseline estimate of capacity for the site. The baseline would then be adjusted based on the estimated empirical relationship between planned additional capacity and actual development. Moreover, the model would accommodate the various additional state requirements by conditioning the empirical estimates on a variety of additional variables reflecting those requirements, such as age of existing building, FAR and existing land use.

*Assumptions*

It is anticipated that the result of the proposed methodology will yield a realistic development potential that is similar to the total amount of housing development that has historically occurred during an eight-year period in the City. This estimate will be adjusted upwards to account for recent and pending changes to the City's development conditions that reasonably support the argument that additional development may occur. This includes adjustments based on:

- Added planned capacity and development potential as a result of recently-adopted affordable housing streamlining tools, including the City's Transit Oriented Communities (TOC) Program, local affordable housing incentive programs, and state streamlining bills SB 35 and AB 2162 that have expanded utilization of the City's Density Bonus program;
- Added development potential as a result of recent changes to state Accessory Dwelling Unit (ADU) laws;

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<sup>8</sup> Based on remaining capacity from the 5<sup>th</sup> cycle Inventory of Sites, after removing sites that have had a building permit issued, with and without conversion factors. As of building permit analysis completed on August 27, 2020.

- Added planned capacity as a result of completed updates to Community Plans, Specific Plans and Transit Neighborhood Plans that have been adopted since the 2013 Housing Element; and
- Added planned capacity as a result of pending updates to Community Plans, Specific Plans and Transit Neighborhood Plans that will be adopted prior to the adoption of the 2021-2029 Housing Element.<sup>9</sup>

During an eight-year period from 2012-2019 (inclusive), a total of 113,608 housing units were permitted, of which 9,500 units were affordable to lower-income households.<sup>10</sup> Table 3 shows these units, broken down by income level.

**Table 3 City of Los Angeles Permitted Housing Units, 2012-2019**

Income Level	Number of Units
Very Low Income	5,577
Low Income	3,923
Moderate Income	720
Above Moderate Income	103,388
Total Permitted Units	113,608

Based on the adjustments previously described, the City conservatively estimates that the proposed methodology will identify a realistic development capacity of approximately 306,750 units for the 6<sup>th</sup> cycle Housing Element.

In addition, the City's Site Inventory may account for pipeline housing development projects that have not yet been completed during this planning cycle. These include pending, approved or permitted housing development projects that are expected to receive a Certificate of Occupancy (COO) after the beginning of the 2021-2029 planning period. The City conservatively estimates that 101,662 pending, approved or permitted housing development projects that are expected to receive a COO after the beginning of the 2021-2029 planning period and therefore count towards the 6<sup>th</sup> cycle RHNA need. Of these, approximately 36,316 have already received approval by the City and therefore are not analyzed in this study, except under a cumulative impact analysis.<sup>11</sup> This analysis included units anticipated to result from the data sources shown in Table 4.

<sup>9</sup> This includes the pending updates to the following Community Plans: Hollywood, Downtown Los Angeles, and Boyle Heights. These pending plan updates are identified as implementation programs in the Draft Housing Element.

<sup>10</sup> As reported in the City's Housing Element Annual Progress Reports for those years.

<sup>11</sup> These units would have been cleared under CEQA previously either with a new CEQA clearance, a finding they were previously subject to environmental review in a prior clearance or are exempt, including under a ministerial exemption. They will be considered under cumulative impact analysis unless already constructed and operational.

**Table 4 City of Los Angeles Pipeline Housing Units Expected to Receive Certificate of Occupancy (COO) During Sixth Cycle, 2012-2019**

Project Type	Net Units Added	% Units Expected to Reach COO <sup>12</sup>	Units Expected to Reach COO
Active Planning Entitlements	174,955	37%	65,346
Approved Planning Entitlements with No Building Permit	72,294	45%	32,532
Approved Building Permits with No COO (Since March 2020) <sup>13</sup>	4,790	79%	3,784
<b>Total</b>	<b>252,039</b>		<b>101,662</b>

As a result, the City conservatively estimates that the Inventory of Sites will identify a total capacity of 408,412 units.

*Anticipated Geographic Distribution of Sites Inventory*

For at least two decades, the City of Los Angeles has been pursuing an approach to accommodating long-range growth as established in the Framework Element of the General Plan, first adopted in 1995. The goals and policies of the Framework Element encourage sustainable growth in higher-intensity commercial and mixed-use districts, centers and boulevards, and in proximity to transit. The Housing Element helps to fulfill this strategy.

Although housing is allowed in the City in all residential and commercial zones and some industrial zones (through adaptive reuse rules), it is reasonable to assume that the geographic distribution of the identified capacity will largely be consistent with that of recent building permit activity and areas of the City that are currently zoned for multi-family and commercial development; however, it is possible that sites are identified in any area where the zoning permits residential uses, including lower density residential sites. Based on the City’s existing growth strategy, much of this capacity is likely to be identified along commercial corridors and existing multi-family neighborhoods located in proximity to public transportation. A large portion of the anticipated housing capacity is expected to be located within a Transit Oriented Communities Area, which is defined as the half-mile radius of a Major Transit Stop. Figure 3 illustrates the potential geographic locations in which sites are likely to be identified, including areas zoned for residential use and areas located within a half-mile of a Major Transit Stop. Figure 4 illustrates the locations of recently permitted housing development projects (using the data from Table 3), which provide further context regarding geographic areas that are likely to be identified.

<sup>12</sup> Based on City Planning analysis of existing pipeline production data, average completion rate (2018-2019).

<sup>13</sup> Building permits issued since March 2020 will still be valid by October 2021 since building permits are valid for 18 months.

Figure 3 Residential Zones, City of Los Angeles

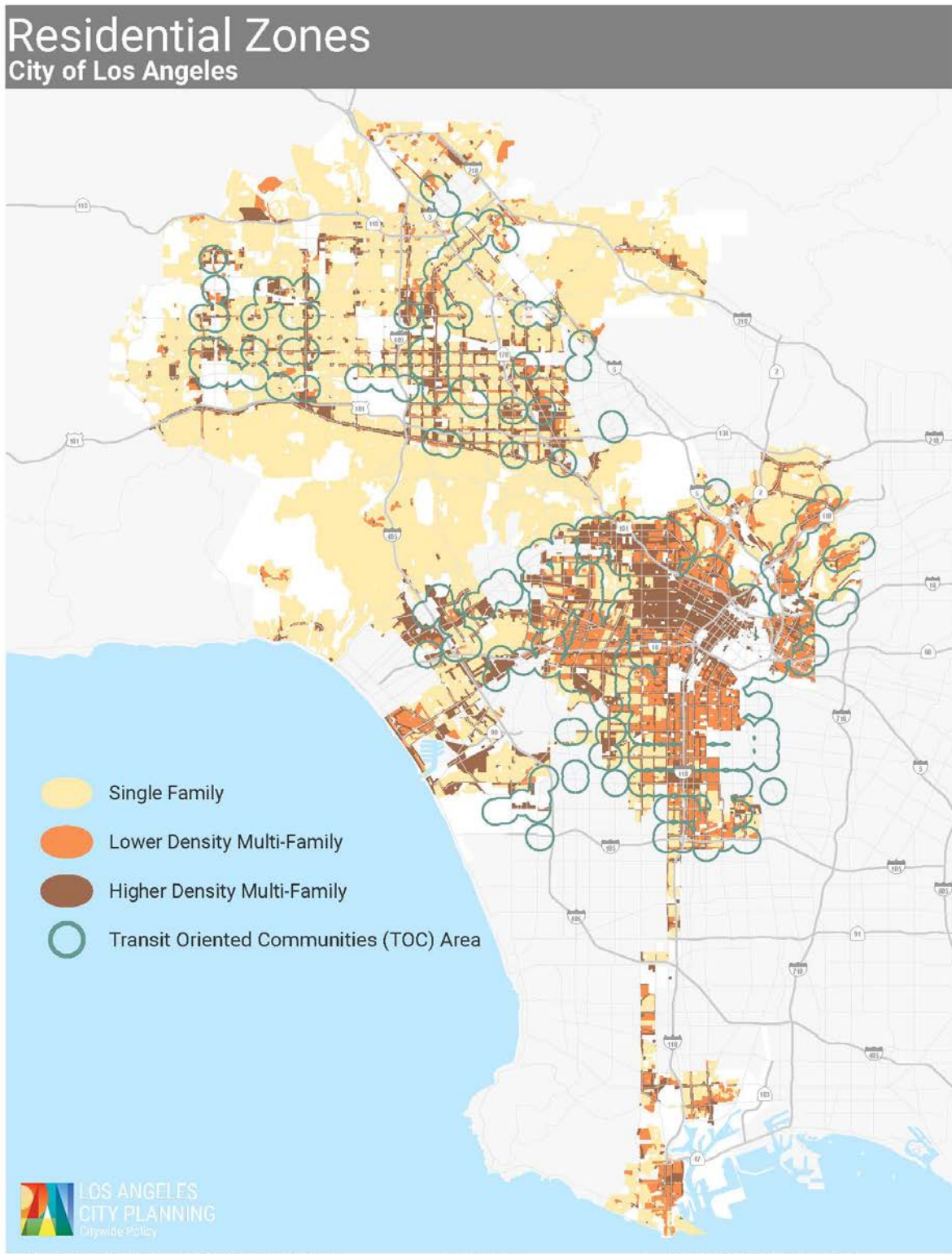
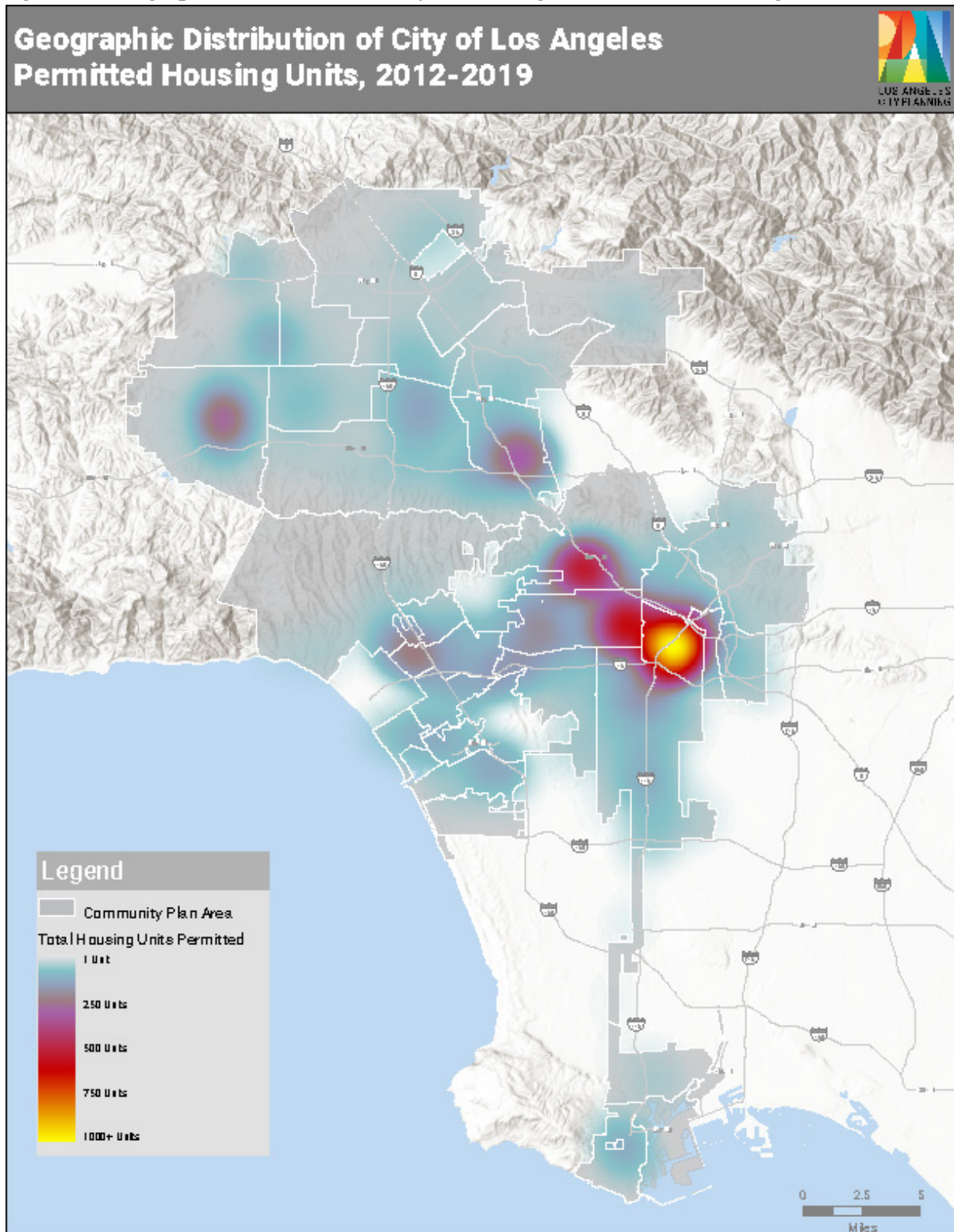


Figure 4 Geographic Distribution of City of Los Angeles Permitted Housing Units, 2012-2019





## Rezoning Program

### *Anticipated Rezoning Program and Assumptions*

#### *Total Rezone Need Estimate*

Based on the estimated capacity of 408,412 units that is previously assumed, and the total target capacity of 501,642 units, it is conservatively estimated that the Housing Element will need to include a program to rezone for the creation of 93,230 additional units of capacity.

#### *Approach and Assumptions*

The Rezoning Program, which would need to be completed by 2024, will likely be accomplished through updates to the City's Community Plans (Land Use Element), an update to the City's Density Bonus program, targeted zone changes, updates to specific plans and overlays, or other zoning ordinances. These programs would likely identify opportunities for rezoning or development incentives in areas that are located in a Transit Priority Area, near major job centers, and in higher resource areas. These programs may also consider rezoning or development incentives in existing lower density residential zones to create opportunities for missing middle housing typologies (up to low-medium residential density) in these areas.

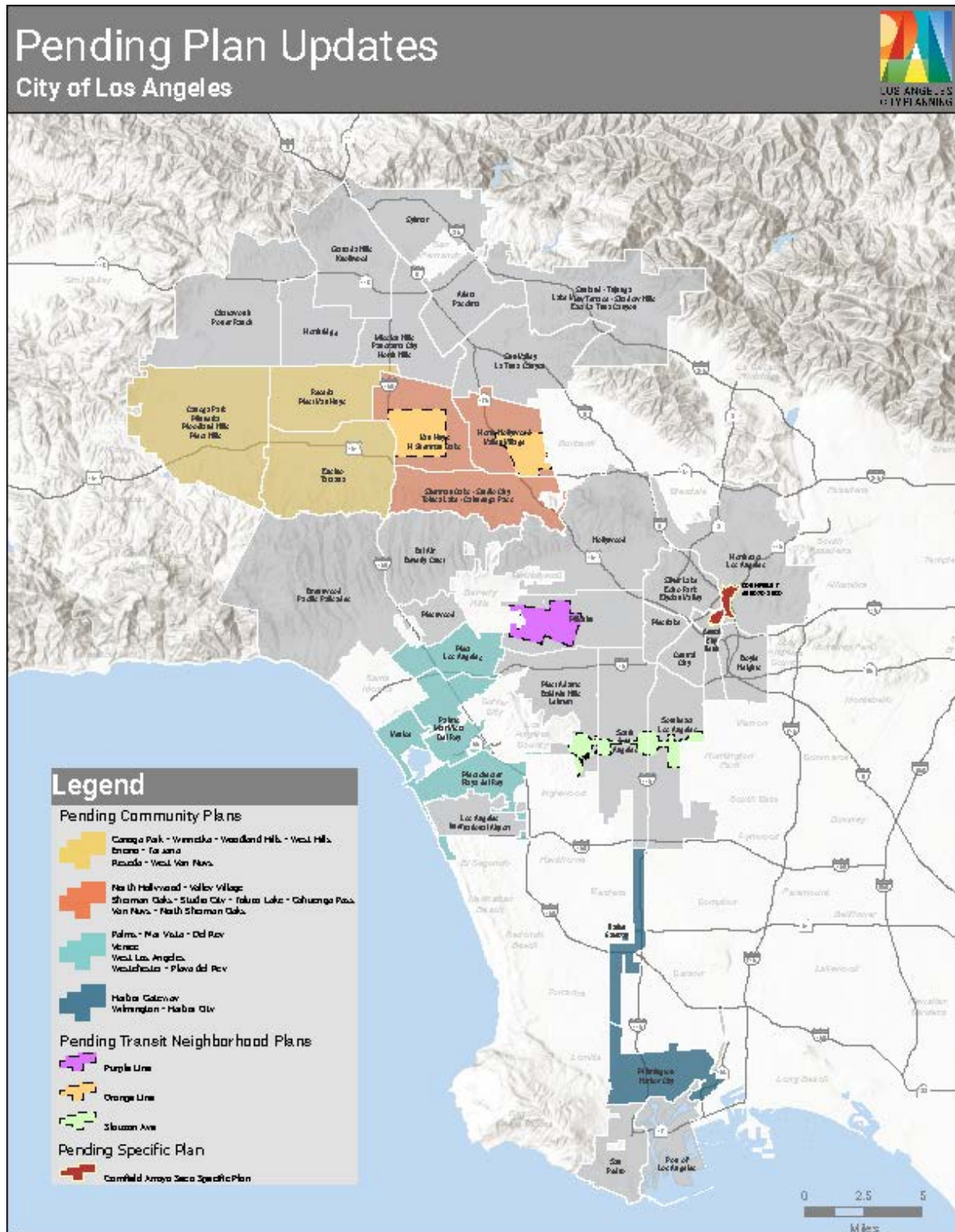
Rezoning programs will do all of the following:

1. **Evaluation and Rezoning to Comply with AFFH Requirements.** Evaluate geographic distribution of identified capacity to determine how well it complies with AFFH requirements; if it is determined that the sites inventory results in an over-concentration of lower-income sites in areas of high segregation and poverty, the rezoning program will work to identify and prioritize areas for upzoning in areas of moderate, high, and highest resource.
2. **Identification of Pending Community Plan Updates and Transit Neighborhood Plans.** Identify existing/planned opportunities for rezoning in forthcoming Community Plan Updates, Transit Neighborhood Plans and Specific Plan Updates. Table 5 lists the 12 pending Community Plan Updates, three pending Transit Neighborhood Plans and one pending Specific Plan Update. The geographic locations of the pending plan Updates are illustrated in Figure 5.

**Table 5 Pending Community Plan Updates, Transit Neighborhood Plans and Specific Plan Updates**

<b>Pending Community Plans</b>
Canoga Park-Winnetka-Woodland Hills- West Hills
Encino-Tarzana
Reseda-West Van Nuys
North Hollywood - Valley Village
Sherman Oaks - Studio City - Toluca Lake - Cahuenga Pass
Van Nuys - North Sherman Oaks
West Los Angeles
Westchester-Playa Del Rey
Venice
Palms-Mar Vista-Del Rey
Harbor Gateway
Wilmington - Harbor City
<b>Pending Transit Neighborhood Plans</b>
Purple Line Transit Neighborhood Plan
Orange Line Transit Neighborhood Plan
Slauson Transit Neighborhood Plan
<b>Pending Specific Plan Updates</b>
Cornfield Arroyo Seco Specific Plan (CASP)

Figure 5 Pending Community Plan Updates, City of Los Angeles



3. **Further Programs for Rezoning.** Identify further actions that will be taken to make sites available during the planning period with appropriate zoning and development standards. Such a program could include, but would not be limited to:
- a. An update to the City’s Density Bonus program, which could include amendments to the City’s Zoning Code to:
    - i. establish additional development incentives for 100 percent affordable developments and mixed-income projects that provide additional affordability
    - ii. expand areas and types of projects where affordable housing incentives apply
    - iii. provide incentives for alternative building typologies such as micro-units, adaptive reuse of existing structures, and low- to medium-scale multi-family housing (“missing-middle”).
    - iv. expand transit-oriented incentives along transit-served commercial corridors
    - v. provide incentives for development projects in higher resource areas
    - vi. allow affordable housing projects on publicly-owned land, as well as land owned by other entities such as school districts, public and private colleges, religious or faith-based institutions, hospitals, and non-profit organizations.
    - vii. expand by-right development and objective design standards;
  - b. An amendment to the City’s Zoning Code to permit residential uses in certain Parking (P) Zones and Public Facilities (PF) zones;
  - c. An update to the City’s ADU Ordinance to further facilitate development of ADUs;
  - d. Targeted rezones of sites that meet certain criteria, including, but not limited to, proximity to public transportation, jobs, amenities, and higher opportunities; and/or
  - e. Rezoning of publicly-owned land to facilitate multi-family residential development and affordable housing development, including City-owned land and land owned by public agencies with surplus land suitable for residential development.

### *Anticipated Geographic Distribution of Rezoning Program*

As previously described, it is anticipated that some or most of the shortfall will be accommodated through rezoning efforts in the pending Community Plan Updates. Most rezoning is anticipated to occur in geographic areas that are similar to those identified in the Inventory of Sites (i.e. areas near public transit, jobs, and in existing growth areas identified in the Framework Element).

It is reasonably foreseeable that rezoning would occur in areas identified in the General Plan including near transit corridors and stations, job centers, neighborhood services and amenities, and particularly in higher resourced areas to provide a more equitable distribution of housing opportunities.

This distribution aligns with State law regarding AFFH goal of prioritizing the identification of sites in higher resource areas, as indicated on Figure 2.

Pursuant to Government Code section 65583.2(h), for any rezoning needed to accommodate a RHNA shortfall for lower income households, the Housing Element Update will include an inventory of potential sites for rezoning. The inventory of potential sites for rezoning would include specified density ranges that could be achieved through a rezoning program; however, the inventory would not constitute formal adoption of any rezoning. Rezoning would occur as a subsequent discretionary action.

## 6. Description of Safety Element Update

The Safety Element is one of the eight State-mandated elements of the General Plan. The purpose of the update to the Safety Element is to comply with recent State legislation and guidelines (such as Assembly Bill 162, Senate Bill 1241, Senate Bill 99, Assembly Bill 747, Senate Bill 1035 and Senate Bill 379). Technical amendments will be made to the Safety Element to achieve compliance with State, regional and local policies and guidelines. The technical amendments will incorporate data and maps, address vulnerability to climate change; incorporate policies and programs from the City's updates to the Local Hazard Mitigation Plan and the Floodplain Management Plan, as well as partial or full integration of other recent city documents (including but limited to: Resilient Los Angeles, L.A. Green New Deal/2019 Sustainability Plan and the Emergency Management Department Emergency Plans and Annexes). The Safety Element amendments will be submitted to the California Geological Survey, California Office of Emergency Services, California State Board of Forestry and Fire Protection, and Federal Emergency Management Agency for review.

## 7. Proposed Project

### **Housing Element Update**

The proposed project involves an update to the Housing Element of the City of Los Angeles General Plan. As described in *Description of the Housing Element Update*, the proposed Housing Element Update establishes programs, policies and actions to generally further the goal of meeting the existing and projected housing needs of all family income levels of the City, and to accommodate the RHNA allocation through the year 2029, as established by SCAG.

Under State Housing Element law, the Project is required to demonstrate the zoned capacity needed to accommodate the development of the RHNA allocation using various land use planning strategies. The City provides capacity for housing through local zoning regulations. The City, however, is not required to physically construct 455,577 units as a result of the RHNA allocation.

This project takes a conservative approach by analyzing the reasonable "worst case" scenario of environmental impacts from future implementation of the 2021-2029 Housing Element, which is the full build-out of the City's RHNA allocation. The most significant potential impact under this approach is the potential construction and operation of between 419,261 and 429,261 housing units (hereafter referred to as "project development"), which represents the City's current Draft RHNA allocation of 455,577 units, less the 36,316 already approved pipeline

housing units expected to receive a COO during the 6<sup>th</sup> cycle. The high end of the range reflects a 10,000-unit buffer, to account for potential increases to the final RHNA allocation figure. The RHNA allocation represents the City's housing goal over the eight-year planning period. Analyzing the production of between 419,261 and 429,261 units is intended to provide a conservative analysis of the reasonable worst-case scenario of environmental impacts from future implementation of the 2021-2029 Housing Element.

These units may occur anywhere in the City where residential uses are permitted, as described below. While some units are anticipated to be built on the Opportunity Sites identified in the Housing Element Inventory of Sites, it is not reasonable to expect that housing development will occur solely on those Opportunity Sites. Housing may occur on any site that is currently zoned for residential use; whereas the Opportunity Sites are subject to a number of requirements to demonstrate realistic likelihood of development and are intended to demonstrate existing zoned capacity to accommodate the City's RHNA allocation (see *Background*). In addition, these units may also occur on sites that do not currently allow residential uses or multi-family residential uses of adequate density and will be rezoned in the future under a Housing Element rezoning implementation program (i.e., Rezoned Sites).

The anticipated 419,261 and 429,261 units may occur in any of the following types of development:

- multi-family residential development, ranging from small apartment buildings with two to 10 units, medium apartment buildings with between 11-49 units, large apartment buildings with between 50-200 units, or larger apartment buildings and high-rise structures with more than 200 units;
- single-family residential development ranging in size and scale from smaller single-family homes to larger single-family homes, small-lot subdivisions, and new single-family subdivisions;
- ADUs including attached ADUs, detached ADUs, Junior ADUs, ADUs converted from existing floor area, multiple ADUs on lots with existing multi-family dwellings, and Movable Tiny Houses;
- mixed-use development, ranging in size and scale from neighborhood commercial mixed use with smaller nonresidential uses, to high-rise mixed-use with larger nonresidential uses; and
- conversion and/or rehabilitation of existing nonresidential, residential and mixed-use structures to be used for housing.

In addition to the general areas shown in Figure 3 and Figure 4, these units may occur in any of the following types of locations:

- sites currently zoned for residential uses, including multi-family and single-family uses;
- sites currently zoned for commercial uses, which permit residential uses;
- sites currently zoned for hybrid industrial uses, which permit joint live-work residential uses;

- non-vacant sites, and sites with existing housing units;
- sites located near public transportation;
- sites located in a Historic Preservation Overlay Zone; and
- sites located in areas with special environmental considerations, such as areas located near Open Space, Hillside Areas, Very High Fire Hazard Severity Zones (VHFHSZ), or the Coastal Zone.

While housing development may generally occur in any of the conditions previously described, certain types of housing development and certain types of locations are anticipated to be more prevalent than others. These assumptions are made and supported by an analysis of the types and locations of housing development that have historically been permitted in the City.<sup>14</sup> Based on this analysis, the City conservatively estimates that of the 419,261 and 429,261 units expected to be developed by 2029, they are expected to occur in the following types of housing projects shown in Table 6.

**Table 6 Anticipated Housing Units, by Type of Development**

Housing Type	Share of Total Permit Activity (%)	Anticipated Number of Housing Units (range)
Single-family and duplex (including ADUS)	18.3	76,705 to 78,534
Multi-family	50.3	211,003 to 216,036
Mixed-use	31.4	131,553 to 134,691
Total	100%	419,261 to 429,261

## 8. Required Approvals

The project requires review of the draft amendments for the Safety Element Update by California Geological Survey, California Office of Emergency Services, California State Board of Forestry and Fire Protection, and the Federal Emergency Management Agency.

The project requires the following discretionary approvals from the City:

- Adoption of the 2021-2029 Housing Element Update
- Adoption of the 2021-2029 Housing Element Update EIR
- Adoption of technical amendments to General Plan Elements, including but not limited to the Safety Element, Framework and other elements as needed to ensure consistency with the updated Housing Element

<sup>14</sup> Based on analysis of building permits issued for housing development projects from 2009 to 2019 in the City of Los Angeles.

- Future Legislative Actions to Implement Programs, including rezoning program, to comply with State law.

The project additionally requires the following approval from HCD prior to the City's final adoption of the 2021-2029 Housing Element Update:

- Review of the draft 2021-2029 Housing Element Update to determine compliance with state law and submittal of written findings to the City.

No discretionary approvals from other agencies are required.

## 9. Other Public Agencies Whose Approval is Required

The HCD reviews and determines whether the Housing Element Update complies with State law. Aside from HCD, no other approvals by outside public agencies are required.

## 10. Have California Native American Tribes Traditionally and Culturally Affiliated with the Project Area Requested Consultation Pursuant to Public Resources Code Section 21080.3.1?

The City prepared and mailed AB 52 notification letters to each tribe listed by the Native American Heritage Commission (NAHC) on November 12, 2020. The Fernandeño Tataviam Band of Mission Indians requested consultation. The initial meeting was held on December 1, 2020. The consultation is ongoing, and a summary of the consultation process will be discussed in the *Tribal Cultural Resources* section of the EIR. No other tribes requested consultation.



## Environmental Factors Potentially Affected

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This project would potentially affect the environmental factors checked below, involving at least one impact that is “Potentially Significant” as indicated by the checklist on the following pages.

- |   |  |  |
|---|--|--|
| <input checked="" type="checkbox"/> Aesthetics                | <input type="checkbox"/> Agriculture and Forestry Resources  | <input checked="" type="checkbox"/> Air Quality                        |
| <input checked="" type="checkbox"/> Biological Resources      | <input checked="" type="checkbox"/> Cultural Resources       | <input type="checkbox"/> Energy  |
| <input checked="" type="checkbox"/> Geology/Soils             | <input checked="" type="checkbox"/> Greenhouse Gas Emissions | <input checked="" type="checkbox"/> Hazards and Hazardous Materials    |
| <input checked="" type="checkbox"/> Hydrology/Water Quality   | <input checked="" type="checkbox"/> Land Use/Planning        | <input type="checkbox"/> Mineral Resources                             |
| <input checked="" type="checkbox"/> Noise                     | <input checked="" type="checkbox"/> Population/Housing       | <input checked="" type="checkbox"/> Public Services                    |
| <input checked="" type="checkbox"/> Recreation                | <input checked="" type="checkbox"/> Transportation           | <input checked="" type="checkbox"/> Tribal Cultural Resources          |
| <input checked="" type="checkbox"/> Utilities/Service Systems | <input type="checkbox"/> Wildfire                            | <input checked="" type="checkbox"/> Mandatory Findings of Significance |

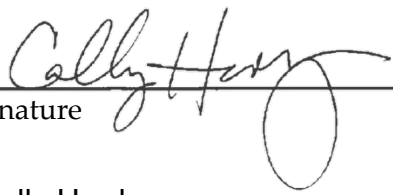
## Determination

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Based on this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions to the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

- I find that the proposed project MAY have a “potentially significant impact” or “less than significant with mitigation incorporated” impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
  
- I find that although the proposed project could have a significant effect on the environment, because all potential significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

  
\_\_\_\_\_  
Signature

Cally Hardy  
\_\_\_\_\_  
Printed Name

January 13, 2021  
\_\_\_\_\_  
Date

City Planning Associate  
\_\_\_\_\_  
Title

# Environmental Checklist

## 1 Aesthetics

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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Except as provided in Public Resources Code Section 21099, would the project:

a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### Safety Element Update

In order to ensure compliance with state law, the City anticipates amending the Safety Element to formally integrate related long-range planning efforts. Furthermore, updates to the Safety Element would involve updates to safety policies and requirements to provide consistency with the Housing Element Update, including those related to emergency response as part of the Local Hazard Mitigation Plan, which would provide guidance to minimize impacts associated with hazardous and unsafe conditions. Therefore, the Safety Element Update would not result in any adverse impacts related to aesthetics.

## Housing Element Update

Scenic views generally refer to visual access to, or the visibility of, a particular natural or man-made visual resource from a given vantage point or corridor. Focal views focus on a particular object, scene, setting, or feature of visual interest. Panoramic views, or vistas, provide visual access to a large geographic area, for which the field of view can be wide and extend into the distance. Panoramic views are usually associated with vantage points looking out over urban or natural areas that provide a geographic orientation and view not commonly available. Examples of panoramic views might include an urban skyline, a valley, a mountain range, the ocean, or other water bodies. The City's General Plan Conservation Element defines scenic views or vistas as the panoramic public view access to natural features, including views of the ocean, striking or unusual natural terrain, or unique urban or historic features. Public access to these views is typically from park lands, publicly owned sites, and public rights-of-way (City of Los Angeles 2001).

Los Angeles is generally bounded by the San Gabriel Mountains and Santa Susana Mountains to the north and the Palos Verdes Hills and Pacific Ocean to the south and west, which are some of the most prominent scenic resources in the City. The Santa Monica Mountains extend across the middle of the City from the east to Griffith and Elysian Parks. The San Gabriel Mountains and Santa Monica Mountains are the most visible features from many areas of the City. The Los Angeles River and its associated tributaries and flood plains are also prominent topographic features; however, they can only be seen from close-up foreground views. In the western portions of the City, the Pacific Ocean is a prominent scenic resource (City of Los Angeles 2001). Manmade scenic resources within the City include urban skylines, such as Downtown Los Angeles, the Hollywood Sign and Griffith Observatory, public parks, and historic buildings throughout the City, such as historic theaters, hotels, and districts.

The City of Los Angeles has established several regulatory requirements for the preservation of aesthetic resources within the City. The following are summaries of the regulatory compliance measures (RCMs) related to aesthetics that the proposed project would be subject to:

- **RCM-AE-1 (Hillside):** To ensure consistency with the Baseline Hillside Ordinance, the project is required to comply with the City's Hillside Development Guidelines, including, but not limited to, setback requirements, residential floor area maximums, height limits, lot coverage and grading restrictions.
- **RCM-AE-2 (LA River):** Compliance with provisions of the Los Angeles River Improvement Overlay District. The project is required to comply with development regulations set forth in Section 13.17.F of the Los Angeles Municipal Code (LAMC) as applicable, including, but not necessarily limited to, landscaping, screening/fencing, and exterior site lighting.
- **RCM-AE-3 (Vandalism):** Compliance with provisions of the Los Angeles Building Code. The project is required to comply with all applicable building code requirements, including the following:

- Every building, structure, or portion thereof, shall be maintained in a safe and sanitary condition and good repair, and free from, debris, rubbish, garbage, trash, overgrown vegetation or other similar material, pursuant to LAMC Section 91.8104.
- The exterior of all buildings and fences shall be free from graffiti when such graffiti is visible from a street or alley, pursuant to LAMC Section 91.8104.15.
- **RCM-AE-4 (Signage):** Compliance with provisions of the Los Angeles Building Code. The project is required to comply with the LAMC Section 91.6205, including on-site signage maximums and multiple temporary sign restrictions, as applicable.
- **RCM-AE-5 (Temporary Signage on Temporary Construction Walls):** Compliance with provisions of the Los Angeles Building Code. The project is required to comply with the LAMC Section 14.4.17, including, but not limited to, the following provisions:
  - The applicant is required to obtain a permit for any temporary sign on a temporary construction wall.
  - The area of the sign cannot extend above the top of the wall or fence and is required to comply with the requirements under Section 14.4.17.B.
  - Signs are to remain for as long as the building permits associated with the construction site remain in effect or for a period of two years, whichever is less.
  - Signs may only be placed to a maximum height of eight feet.
  - Temporary signs surrounding vacant lots are limited to lots located in a commercial or industrial zone.
- **RCM-AE-6 (Outdoor Lighting Affecting Residential Property):** Compliance with provisions of the Los Angeles Electrical Code. The project is required to comply with the LAMC Section 93.0117 which regulates lighting intensity or direct glare and is applicable to any exterior light source, lamp holder, or sign light source.
- **RCM-AE-7 (Height of Building or Structures):** Compliance with provisions of the Los Angeles Height Districts and any additional applicable provisions regulating height or massing in Specific Plan Areas. The project is required to comply with LAMC Sections 12.21.1 through 12.21.6, and any applicable Specific Plan regulation (as enumerated in LAMC Section 12.04), in which the total floor area, number of stories, and overall height cannot exceed those limits for the district in which the building or structure is located.
- **RCM-AE-8 (Coastal Development Permits):** Compliance with provisions of the LAMC Section 12.20.2, which enforces the California Coastal Act of 1976 and helps protect the State's natural and scenic resources along in coastal zones. Project applicants are required to apply for, and obtain, a Coastal Development Permit for any development in the Coastal Zone.
- **RCM-AE-9 (Site Plan Review):** Compliance with provisions of Section 16.05, which requires a site plan review for any project that creates, or results in, an increase of 50 or more dwelling units or 50,000 gross square feet or more of nonresidential floor area. Project applicants are required to obtain a site plan review prior to issuance of any grading permit, foundation permit, building permit, or use of land permit.

In addition to the previously listed RCMs, the proposed project would also be subject to any applicable regulations intended to protect scenic and visual resources established in adopted specific plans and overlay zones, such as the Mulholland Scenic Parkway Specific Plan (1992), San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan (2004), Historic Preservation Overlay Zones (HPOZ), and Community Design Overlays (CDO). For example, the Mulholland Scenic Parkways Specific Plan and San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan further establish specific regulations for Mulholland Drive and the San Gabriel/Verdugo Mountains related to land use, prominent ridgelines, viewsheds, vista points, lighting, signage, and building heights and massing (City of Los Angeles 1992; City of Los Angeles 2003). Overlays further implement the City's General Plan and Community Plans through neighborhood-specific policy objectives, supplementing the underlying base zoning. For example, CDOs contain design guidelines that enhance the visual identity and character of a neighborhood. They can apply to new development projects and to improvements to existing properties.

*a. Would the project have a substantial adverse effect on a scenic vista?*

The project would have the potential to affect scenic vistas if new or intensified development blocked such vistas including, views of the ocean, striking or unusual natural terrain, or unique urban or historic figures (City of Los Angeles 2001). Potential impacts could include obstructing views of scenic resources such as the San Gabriel and Santa Susana Mountains or the Pacific Ocean currently available from public vantage points. However, the proposed project would prioritize the development of new housing on infill sites in areas with existing public transit infrastructure. More specifically, a large portion of anticipated housing is expected to be located within a Transit Oriented Communities Area, which is defined as the half-mile radius of a Major Transit Stop. Therefore, while Rezoned Sites would allow for the development of new housing, potentially at higher densities than currently present on areas identified for rezoning, the Rezoned Sites would be in existing developed areas in the City, and would generally not be in areas of the City that are adjacent to scenic resources such as the mountainous and beach areas. Therefore, development on these sites is not expected to result in significant adverse impacts to a scenic vista.

Furthermore, future project developments would be required to comply with zoning and overlay regulations, including specific plan or community plan development regulations, that implement General Plan goals and policies intended to protect scenic and visual resources. These include landform protection and scenic features protection in the City's General Plan Conservation Element and Scenic Highways protection in the Mobility Element, as well as those regulations in RCM-AE-1 (Hillside), RCM-AE-2 (LA River), RCM-AE-8 (Coastal Development Permits) for development in the vicinity of potentially scenic resources such as hillsides, the Los Angeles River, and Coastal Zones. Certain specific plans, such as the Mulholland Scenic Parkways Specific Plan and San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan also include development regulations related to prominent ridgelines, viewsheds, and vista points, (City of Los Angeles 1992; City of Los Angeles 2003). Any project within a specific plan is required to comply with the associated Zoning Code regulations. Furthermore, any project with more than 50 housing units requires a site plan

review per LAMC Section 16.05(c), which consists of a process to review development with respect to their sites, surrounding properties, and environmental setting to identify any potential impacts. Therefore, potential development under the project would not result in substantial adverse effects on scenic vistas and impacts would be less than significant.

**LESS THAN SIGNIFICANT IMPACT**

- b. Would the project substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?*

According to the California State Scenic Highway System Map, the Pasadena Freeway (State Route [SR] 110) from East Colorado Boulevard in the City of Pasadena to the Santa Ana Freeway (SR 101) in Los Angeles is a designated Federal Scenic Byway (California Department of Transportation [Caltrans] 2020). Topanga Canyon Boulevard (SR 27) from SR 1 to the City of Los Angeles' northwestern boundary was recently designated as a State Scenic Highway and is the only officially designated route in the City. In addition, there are several highways in and adjacent to the City that are eligible for listing as a State Scenic Highway (Caltrans 2020). Portions of Pacific Coast Highway (SR 1) from Venice Boulevard in the City and north through Ventura and Santa Barbara Counties and Ronald Reagan Freeway (SR 118) from the western boundary of the City to Ventura County are eligible for designation as a State Scenic Highway (Caltrans 2020).

While the geographic distribution of development would largely occur in areas of the City that are currently zoned for multi-family and commercial development in proximity to transit (see Figure 2-3), it is possible that individual project development sites are identified in any area where the zoning permits residential uses or as part of the Rezoning Program, including lower density residential sites in the vicinity of a designated State Scenic Highway or roadways eligible for listing as State Scenic Highways. However, if development under the proposed project occurred in the vicinity of an eligible State Scenic Highway, individual projects would be required to comply with City regulations that would minimize potential impacts to scenic resources, such as protected trees or historic buildings. Furthermore, the City designates HPOZs to protect neighborhoods with distinct architectural and cultural resources, and to govern the review of project applications. See Section 4, *Biological Resources*, which refers to the ordinances related to protected and heritage trees, and Section 5, *Cultural Resources*, which includes RCM-CR-1 (Permits for Historical and Cultural Buildings). Potential impacts would be less than significant.

**LESS THAN SIGNIFICANT IMPACT**

- c. *Would the project, in non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?*

As discussed above, the proposed project involves the potential construction and operation of between 419,261 and 429,261 housing units. Based on the City's existing growth strategy, most development sites are likely to be identified along commercial corridors and existing multi-family neighborhoods located in proximity to public transportation. For those sites identified in the Inventory of Sites, project development would need to comply with applicable zoning (i.e., floor area ratio (FAR), building heights and setbacks, and height requirements) and other regulations governing scenic quality and, therefore, would not be expected to result in impacts to existing visual character or quality of public views. Furthermore, the Rezoning Program would primarily target rezones of sites with proximity to public transportation and jobs. Nonetheless, it is also possible that sites are identified in any area where the zoning permits residential uses or as part of the Rezoning Program, including lower density residential sites with a particular visual character. As such, the proposed project would facilitate new residential development and allow for higher densities than currently exists in some areas and may have the potential to visually degrade the character or quality of sites or areas of the City or surrounding areas (e.g., change FAR, building height, and massing), particularly for sites identified as part of the Rezoning Program. The project's potential impacts related to visual character or quality of public views of the proposed project on sensitive receptors will be further analyzed in an EIR.

#### **POTENTIALLY SIGNIFICANT IMPACT**

- d. *Would the project create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?*

Most of the City is highly urbanized with existing sources of light and glare. As part of the Housing Element Update, most development sites are likely to be identified along commercial corridors and existing multi-family neighborhoods located in proximity to public transportation. While most project development would occur in urbanized areas with existing sources of light and glare, project sites could be identified in any area where the zoning permits residential uses or as part of the Rezoning Program, including lower density residential sites that are not currently exposed to significant sources of light or glare. It could be reasonably anticipated that illumination from new development (security lighting, parking lot lighting, ornamental lighting, pedestrian scale lights, lighting from ground floor storefronts and signs) would increase overall lighting levels in areas where increased development is expected to occur as the result of implementation of the Housing Element Update. In addition, it could be anticipated that project development, particularly development projects of substantial scale, would result in the introduction of lighting in areas where currently lighting levels are low or where lighting levels along sidewalks is interrupted by darkened or shadowed areas. It is also possible that additional sources of nighttime



lighting associated with increased development capacity, crime prevention, and increased vehicle traffic would be implemented.

However, dense transit corridors are characterized by existing residential, commercial, and civic development uses that already incur high ambient levels of nighttime lighting, any additional lighting from new development would be incremental. Furthermore, project development, whether in transit corridors or elsewhere would be required to comply with the lighting provisions of the LAMC to reduce potential impacts from light. LAMC Section 12.21 A.5(k) (amended by Ordinance No. 171,858) states that all lights used to illuminate a parking area shall be designed, located and arranged so as to reflect the light away from any street and any adjacent premises. In addition, any new lighting would be designed to conform to applicable standards, including LAMC Sections 93.0117 and 12.21 A.5(k), which pertain to outdoor lighting affecting residential property (no more than two foot-candles of lighting intensity from a light source is allowed on adjacent residential property). Furthermore, the proposed project would be required to comply with RCM-AE-4 (Signage), which provides regulations for signage (including signage lighting) in the City, and RCM-AE-6 (Outdoor Lighting Affecting Residential Property), which regulates lighting intensity from any exterior light source, lamp holder, or sign light source. Other specific LAMC lighting standards applicable to the Housing Element Update include:

- Chapter 1, Article 2, Section. 12.21 A5(k). All lights used to illuminate a parking area shall be designed, located and arranged so as to reflect the light away from any streets and any adjacent premises.
- Chapter 1, Article 7, Section. 17.08C. Plans for street lighting system shall be submitted to and approved by the Bureau of Street Lighting.
- Chapter 9, Article 3, Section. 93.0117. No exterior light source may cause more than two foot-candles (21.5 lux) of lighting intensity or generate direct glare onto exterior glazed windows or glass doors; elevated habitable porch, deck, or balcony; or any ground surface intended for uses such as recreation, barbecue or lawn areas or any other property containing a residential unit or units.
- Chapter 9, Article 1, Section 91.6205 (K)4. Signs are prohibited if they contain flashing, mechanical and strobe lights in conflict with the provisions of Section 80.08.4 and 93.6215 of this code.
- Chapter 9, Article 1, Section 91.6205M. No sign shall be arranged and illuminated in such a manner as to produce a light intensity of greater than three foot-candles above ambient lighting, as measured at the property line of the nearest residentially zoned property.

Glare is a common phenomenon in the City primarily due to the occurrence of a high number of days per year with direct sunlight and the highly urbanized nature of the region. Daytime glare can result from sunlight reflecting off glass, other structural fixtures of buildings, and windshields of parked and moving vehicles within the roadways in the City. Although a large portion of existing structures in the City are comprised of non-reflective materials such as concrete, wood, stucco and plaster, some structures, particularly in the commercial districts of the City, consist of considerable amounts of reflective floor-to-ceiling glass windows.

Project development would be required to comply with LAMC standards and regulations for lighting and glare affecting sensitive residential uses, which discourage the use of highly reflective or deeply tinted glass. Specifically, as listed in RCM-AE-6 (Outdoor Lighting Affecting Residential Property), LAMC Section 93.0117 direct glare from any light source, where “direct glare” is defined as glare resulting from high luminance or insufficiently shielded light sources that is in the field of view.

While the Housing Element Update involves increased development and density, new housing would primarily consist of infill development in areas with substantial sources of existing light and glare. Even in non-transit corridor areas, development would be required to comply with existing regulations for light and glare discussed above. Light and glare associated with the Project development may incrementally increase daytime and nighttime light and glare in the area. However, due to the urbanized nature of the region and with compliance with applicable regulations in the LAMC, impacts would be less than significant.

**LESS THAN SIGNIFICANT IMPACT**

## 2 Agriculture and Forestry Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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Would the project:

a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with existing zoning for agricultural use or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)); timberland (as defined by Public Resources Code Section 4526); or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### Safety Element Update

In order to ensure compliance with state law, the City anticipates amending the Safety Element to formally integrate related long-range planning efforts. Furthermore, updates to the Safety Element would involve updates to safety policies and requirements to provide

consistency with the Housing Element Update, including those related to emergency response as part of the Local Hazard Mitigation Plan, which would provide guidance to minimize impacts associated with hazardous and unsafe conditions. Therefore, the Safety Element Update would not result in any adverse impacts related to agriculture and forestry resources.

### **Housing Element Update**

- a. Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?*

According to the California Important Farmland Finder Map, the City contains land designated as Prime Farmland and Unique Farmland (California Department of Conservation [DOC] 2020). As part of the Housing Element Update, most development sites are likely to be identified along commercial corridors and existing multi-family neighborhoods located in proximity to public transportation. While it is possible that as part of the Rezoning Program development sites could be identified in areas that are designated as Important Farmland, it is reasonable to assume that the geographic distribution of project development would largely be consistent with that of recent building permit activity and areas of the City that are currently zoned for multi-family and commercial development. Therefore, the proposed project would not likely convert important Farmland to non-agricultural uses and impacts would be less than significant.

#### **LESS THAN SIGNIFICANT**

- b. Would the project conflict with existing zoning for agricultural use or a Williamson Act contract?*

In addition to the Important Farmland discussed under impact *a.* of this section, the City contains other land zoned for agricultural use, consisting of A1 and A2 Zones. The A1 and A2 Zones in the City allow for single-family residential uses and include existing standards to limit the intensity of development. Conditions for development and allowed uses in agricultural zones must adhere to LAMC Sections 12.05 and 12.06. The distribution of project development would largely occur in areas of the City that are currently zoned for multi-family and commercial development in proximity to transit (see Figure 2-3). Nonetheless, it is possible that individual project development sites are located in A1 or A2 zones, and that new single-family residences or ADUs are built on these sites. However, such development is not likely or anticipated on a level that would significantly conflict with the sites' use as agricultural land. Furthermore, according to the DOC, there are no Williamson Act contracts in the City (DOC 2016). Therefore, the proposed project would not likely conflict with existing zoning for agricultural use or a Williamson Act contract and impacts would be less than significant.

#### **LESS THAN SIGNIFICANT IMPACT**

- c. *Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)); timberland (as defined by Public Resources Code Section 4526); or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?*

“Forest land” is defined in PRC Section 12220(g) pursuant to the California Forest Legacy Program Act of 2007 as land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits. Per the City of Los Angeles Conservation Element, the only substantial conifer and big tree forests in the vicinity of Los Angeles are located outside the City’s boundaries in the Angeles National Forest and on the north slope of the Santa Susana Mountains, mostly within the Santa Clarita Woodlands Park (2001). Angeles National Forest managed by the U.S. Forest Service and the Santa Clarita Woodlands Park is managed by the Santa Monica Mountains Conservancy (City of Los Angeles 2001). Both of these forested areas are protected land and neither is zoned for timberland or Timberland Production, or land that has been protected under the California Forest Legacy Program. While the majority of the City is urbanized with limited forest land, there are mountains and hillsides within the City that support native trees and have been designated as Open Space. Nonetheless, the City does not have existing zoning for forest land or timberland that would be rezoned as part of the Rezoning Program. While the Rezoning Program could result in development on hillside areas that could be considered “forest land” under PRC Section 12220(g), LAMC Section 12.04 does not allow for residential development on areas zoned for Open Space. Because forests land and open space that could support native trees are limited within the City, and provisions of the Municipal Code do not allow for residential development on areas designated as Open Space, the proposed project would have a less than significant impact on forest land or forestry resources.

**LESS THAN SIGNIFICANT IMPACT**

- d. *Would the project result in the loss of forest land or conversion of forest land to non-forest use?*

As described under impact discussion c. of this section, there is limited forest land in the City. The nearest forest areas are located in the Angeles National Forest and Santa Susana Mountains. Both of these forests are protected resources and would not be impacted by project development. The forest land and open space that exists within the City is limited in its distribution and residential development in these areas would not be allowed in accordance to the LAMC Section 12.04. Therefore, the proposed project would not result in the loss of forest land or conversion of forest land to non-forest use and there would be a less than significant impact.

**LESS THAN SIGNIFICANT IMPACT**

- e. Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?*

As discussed under impact discussions *a.* through *d.* of this section, the City of Los Angeles is urbanized, but does include zones for agricultural use and open space that can support native tree cover. In addition, the City contains land designated as Prime Farmland and Unique Farmland (California Department of Conservation [DOC] 2020). Furthermore, residential development in areas zoned for Open Space is prohibited by the LAMC. While it is possible that individual housing project sites would be located in any area where the zoning permits residential uses, such as single-family or ADU development on agricultural zones, it is reasonable to assume that the geographic distribution of project development would largely be consistent with that of recent building permit activity and areas of the City that are currently zoned for multi-family and commercial development. Therefore, such development is not likely or anticipated on a level that would significantly conflict with the sites' use as agricultural land. The proposed project would not involve other changes in the existing environment which could result in the conversion of Farmland to non-agricultural use or the conversion of forest land to non-forest use. There would be a less than significant impact.

**LESS THAN SIGNIFICANT IMPACT**

### 3 Air Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	■	□	□	□
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	■	□	□	□
c. Expose sensitive receptors to substantial pollutant concentrations?	■	□	□	□
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	□	□	■	□

#### Safety Element Update

In order to ensure compliance with state law, the City anticipates amending the Safety Element to formally integrate related long-range planning efforts. Furthermore, updates to the Safety Element would involve updates to safety policies and requirements to provide consistency with the Housing Element Update, including those related to emergency response as part of the Local Hazard Mitigation Plan, which would provide guidance to minimize impacts associated with hazardous and unsafe conditions. Therefore, the Safety Element Update would not result in any adverse impacts related to air quality.

#### Housing Element Update

#### Air Quality Standards and Attainment

The City of Los Angeles is in the South Coast Air Basin (Basin), which includes the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, and all of Orange County. The Basin is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). As the local air quality management agency, the SCAQMD is required to monitor

air pollutant levels to ensure that State and federal air quality standards are met and, if they are not met, to develop strategies to meet the standards.

Depending on whether the standards are met or exceeded, the Basin is classified as being in “attainment” or “nonattainment.” Under State law, air districts are required to prepare a plan for air quality improvement for pollutants for which the district is in non-compliance. The SCAQMD is in non-attainment for the federal standards for ozone and PM<sub>2.5</sub> (particulate matter up to 2.5 microns in size) and the State standards for ozone, PM<sub>10</sub> (particulate matter up to 10 microns in size), and PM<sub>2.5</sub>. The Los Angeles County portion of the Basin is also designated non-attainment for lead (SCAQMD 2016). The Basin is designated unclassifiable or in attainment for all other federal and State standards. The health effects associated with criteria pollutants for which the Basin is in non-attainment are described in Table 7.

**Table 7 Health Effects Associated with Non-Attainment Criteria Pollutants**

Ozone	(1) Short-term exposures: (a) pulmonary function decrements and localized lung edema in humans and animals and (b) risk to public health implied by alterations in pulmonary morphology and host defense in animals; (2) long-term exposures: risk to public health implied by altered connective tissue metabolism and altered pulmonary morphology in animals after long-term exposures and pulmonary function decrements in chronically exposed humans; (3) vegetation damage; and (4) property damage.
Suspended particulate matter (PM <sub>10</sub> )	(1) Excess deaths from short-term and long-term exposures; (2) excess seasonal declines in pulmonary function, especially in children; (3) asthma exacerbation and possibly induction; (4) adverse birth outcomes including low birth weight; (5) increased infant mortality; (6) increased respiratory symptoms in children such as cough and bronchitis; and (7) increased hospitalization for both cardiovascular and respiratory disease (including asthma). <sup>a</sup>
Suspended particulate matter (PM <sub>2.5</sub> )	(1) Excess deaths from short- and long-term exposures; (2) excess seasonal declines in pulmonary function, especially in children; (3) asthma exacerbation and possibly induction; (4) adverse birth outcomes, including low birth weight; (5) increased infant mortality; (6) increased respiratory symptoms in children, such as cough and bronchitis; and (7) increased hospitalization for both cardiovascular and respiratory disease, including asthma. <sup>a</sup>

<sup>a</sup> More detailed discussions on the health effects associated with exposure to suspended particulate matter can be found in the following documents: EPA, Air Quality Criteria for Particulate Matter, October 2004.

Source: U.S. EPA, <http://www.epa.gov/airquality/urbanair/>

## Air Quality Management

The SCAQMD administers the Air Quality Management Plan (AQMP) for the Basin, which is a comprehensive document outlining an air pollution control program for attaining all California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS). The most recently adopted AQMP is the 2016 AQMP (SCAQMD 2017), which was adopted by the SCAQMD Governing Board on March 3, 2017. The 2016 AQMP represents a new approach, focusing on available, proven, and cost-effective alternatives to



traditional strategies while seeking to achieve multiple goals in partnership with other entities promoting reductions in greenhouse gas (GHG) emissions and toxic risk, as well as efficiencies in energy use, transportation, and goods movement (SCAQMD 2017). The 2016 AQMP incorporates new scientific data and notable regulatory actions that have occurred since adoption of the 2012 AQMP, including the approval of the new federal 8-hour ozone standard of 0.070 ppm that was finalized in 2015.

The Final 2016 AQMP addresses several State and federal planning requirements and incorporates new scientific information, primarily in the form of updated emissions inventories, ambient measurements, and meteorological air quality models. The SCAG's projections for socio-economic data (e.g., population, housing, employment by industry) and transportation activities from the 2016 RTP/SCS are integrated into the 2016 AQMP. On September 3, 2020, SCAG's Regional Council formally adopted the 2020-2045 RTP/SCS (2020 RTP/SCS), or *Connect SoCal*, which builds upon the progress made through implementation of the 2016 RTP/SCS, and was developed through a four-year planning process to update population, housing and employment data as well as transportation strategies for the region through the horizon year of 2045. The impact analysis throughout this Initial Study uses the demographic data provided in the 2020 RTP/SCS; however, SCAQMD has not updated the 2016 AQMP to incorporate these new demographic projections, which is expected to occur in 2022.

The 2016 AQMP builds upon the approaches taken in the 2012 AQMP for the attainment of federal PM and ozone standards and highlights the significant amount of reductions to be achieved. It emphasizes the need for interagency planning to identify additional strategies to achieve reductions within the timeframes allowed under the federal Clean Air Act, especially in the area of mobile sources. The 2016 AQMP also includes a discussion of emerging issues and opportunities, such as fugitive toxic particulate emissions, zero-emission mobile source control strategies, and the interacting dynamics among climate, energy, and air pollution. The Plan also demonstrates strategies for attainment of the new federal eight-hour ozone standard and vehicle miles traveled (VMT) emissions offsets, pursuant to recent United States Environmental Protection Agency (U.S. EPA) requirements (SCAQMD 2017).

### **Air Emission Thresholds**

The State CEQA Guidelines (Section 15064.7) provide that, when available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make determinations of significance. These thresholds are designed such that a project that would not exceed the adopted thresholds would not have an individually or cumulatively significant impact on the Basin's air quality. Therefore, a project that does not exceed these SCAQMD thresholds would have a less than significant impact. This Initial Study conforms to the methodologies recommended in the SCAQMD's *CEQA Air Quality Handbook* (1993) and supplemental guidance provided by the SCAQMD, including recommended thresholds for emissions associated with both construction and operation of the project (SCAQMD 2015).

Table 8 presents the significance thresholds for construction and operational-related criteria air pollutant and precursor emissions for individual projects. These represent the levels at which a project’s individual emissions of criteria air pollutants or precursors would result in a cumulatively considerable contribution to the Basin’s existing air quality conditions.

**Table 8 SCAQMD Regional Significance Thresholds**

Construction Thresholds	Operational Thresholds
75 pounds per day of ROG	55 pounds per day of ROG
100 pounds per day of NO <sub>x</sub>	55 pounds per day of NO <sub>x</sub>
550 pounds per day of CO	550 pounds per day of CO
150 pounds per day of SO <sub>x</sub>	150 pounds per day of SO <sub>x</sub>
150 pounds per day of PM <sub>10</sub>	150 pounds per day of PM <sub>10</sub>
55 pounds per day of PM <sub>2.5</sub>	55 pounds per day of PM <sub>2.5</sub>

Notes: ROG = Reactive Organic Gases; NO<sub>x</sub> = Nitrogen oxides; CO = Carbon monoxide; SO<sub>x</sub> = Sulfur oxides  
 Source: SCAQMD 2015

### SCAQMD Regulations and State Regulations

The following are summaries of RCMs associated with SCAQMD or State regulations related to air quality that the proposed project would be subject to:

- **RCM-AQ-1 (Demolition, Grading and Construction Activities):** The project is required to comply with all applicable standards of the Southern California Air Quality Management District, including the following provisions of District Rule 403:
  - All unpaved demolition and construction areas would be wetted at least twice daily during excavation and construction, and temporary dust covers would be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 50 percent.
  - The construction area would be kept sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind.
  - All clearing, earth moving, or excavation activities would be discontinued during periods of high winds (i.e., greater than 15 mph), so as to prevent excessive amounts of dust.
  - All dirt/soil loads would be secured by trimming, watering or other appropriate means to prevent spillage and dust.
  - All dirt/soil materials transported off-site would be either sufficiently watered or securely covered to prevent excessive amount of dust.
  - General contractors are to maintain and operate construction equipment so as to minimize exhaust emissions.
  - Trucks having no current hauling activity would not idle but be turned off.
  - Vehicle speeds would be limited to 15 mph on unpaved roads.

- **RCM-AQ-2 (Idling of Diesel-fueled Commercial Vehicles):** In accordance with Sections 2485 in Title 13 of the California Code of Regulations, the idling of all diesel-fueled commercial vehicles (weighing over 10,000 pounds) during construction would be limited to five minutes at any location.
- **RCM-AQ-3 (Operation of Diesel-fueled Commercial Vehicles):** In accordance with Section 93115 in Title 17 of the California Code of Regulations, operation of any stationary, diesel-fueled, compression-ignition engines would meet specified fuel and fuel additive requirements and emission standards.
- **RCM-AQ-4 (Architectural Coatings):** The project is required to comply with South Coast Air Quality Management District Rule 1113 limiting the volatile organic compound content of architectural coatings.
- **RCM-AQ-5 (Odor-Reducing Equipment):** The project is required to install odor-reducing equipment in accordance with South Coast Air Quality Management District Rule 1138.
- **RCM-AQ-6 (Emission Control Measures):** New on-site facility nitrogen oxide emissions would be minimized through the use of emission control measures (e.g., use of best available control technology for new combustion sources such as boilers and water heaters) as required by South Coast Air Quality Management District Regulation XIII, New Source Review.
- **RCM-AQ-7 (Spray Painting):** Compliance with provisions of the South Coast Air Quality Management District (SCAQMD) District Rule 403. The project is required to comply with all applicable rules including the following:
  - All spray painting would be conducted within an SCAQMD-approved spray paint booth featuring approved ventilation and air filtration system.
  - Prior to the issuance of a building permit, use of land, or change of use to permit spray painting, certification of compliance with SCAQMD air pollution regulations would be submitted to the Department of Building and Safety.

a. *Would the project conflict with or obstruct implementation of the applicable air quality plan?*

According to SCAQMD, a project may be inconsistent with the AQMP if it would generate population, housing, or employment growth exceeding the forecasts used in the development of the AQMP. The 2016 AQMP relies on local general plans and SCAG forecasts of regional population, housing, and employment growth in the development of the AQMP for the Basin.<sup>15</sup> As such, projects that are consistent with the growth anticipated by local plans would not conflict with the AQMP. If a project is less dense than anticipated by the local plans, the project would likewise be consistent with the AQMP.

The purpose of the Housing Element Update is to comply with State housing element law requiring the City to show it has adequate land designated to accommodate the existing and

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<sup>15</sup> On September 3, 2020, SCAG formally adopted the 2020-2045 RTP/SCS. However, the 2016 AQMP was adopted prior to this date and relies on the demographic and growth forecasts of the 2016-2040 RTP/SCS; therefore, these forecasts are utilized in the analysis of the project's consistency with the AQMP.

projected housing needs reflected in the City's RHNA, which is based on the regional population forecasts. The RHNA does not encourage or promote growth, but rather requires communities to address the projected growth and provide its fair share of the regional housing needs to accommodate the forecasted growth.

As discussed in *Proposed Project*, project development involves the potential construction and operation of between 419,261 and 429,261 housing units. The proposed project would concentrate growth in the City as opposed to elsewhere in the SCAQMD region. Based on the City's existing growth strategy, most development sites are likely to be identified along commercial corridors and existing multi-family neighborhoods located in proximity to public transportation. Project development would primarily accommodate forecasted population growth and relieve overcrowding and existing housing cost burden. However, the project does have the potential to result in additional population growth beyond that forecasted by SCAG. Considering that the Housing Element Update would accommodate housing based on the population projections for the City and housing need for the City's existing population, the proposed project would potentially be consistent with the AQMP. Nonetheless, impacts related to conflicting with or obstructing implementation of applicable air quality plans under the proposed project will be further analyzed in an EIR.

#### **POTENTIALLY SIGNIFICANT IMPACT**

- b. *Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?*
- c. *Would the project expose sensitive receptors to substantial pollutant concentrations?*

Residential construction associated with the Housing Element Update could generate criteria pollutant emissions exceeding the SCAQMD regional construction thresholds. In addition, the operation of new residential development would generate criteria emissions due to vehicle trips to and from individual projects, energy use, and area sources such as the use of landscaping equipment. Operation of the proposed project could potentially generate criteria pollutant emissions exceeding the SCAQMD regional thresholds for operation. Future individual development projects would be required to comply with regulatory requirements RCM-AQ-1 through RCM-AQ-7 to minimize emissions of criteria pollutants during construction and operation. However, further analysis is required to determine whether potentially significant impacts could occur. Therefore, potential air quality impacts due to criteria pollutant emissions will be further analyzed in an environmental impact report (EIR).

In addition, construction activities associated with project development may expose sensitive receptors in the City to substantial pollutant concentrations, such as diesel exhaust from construction equipment and particulate matter generated during grading and excavation activities. As such, potential air quality impacts of the proposed project on sensitive receptors will be further analyzed in an EIR.

#### **POTENTIALLY SIGNIFICANT IMPACT**

- d. *Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?*

The occurrence and severity of potential odor impacts depends on a number of factors, including the nature, frequency, and intensity of the source; the wind speeds and direction; and the sensitivity of the receiving location, each contribute to the intensity of the impact. Although offensive odors seldom cause physical harm, they can be annoying and cause distress among the public and generate citizen complaints.

Construction activities for new residential development under the proposed project may produce temporary odors. Potential odors produced during construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment, and architectural coatings. Such odors would disperse rapidly from the individual project sites, generally occur at magnitudes that would not affect substantial numbers of people and would be limited to the construction period. Furthermore, construction would be required to comply with RCM-AQ-5 (Odor-Reducing Equipment) noted above and SCAQMD Rule 402, which regulates nuisance odors. Accordingly, the construction of future development under the proposed project is not anticipated to create objectionable odors affecting a substantial number of people and impacts would be less than significant.

SCAQMD's *CEQA Air Quality Handbook* (1993) identifies land uses associated with odor complaints as agricultural uses, wastewater treatment plants, chemical and food processing plants, composting, refineries, landfills, dairies, and fiberglass molding. Residential uses are not identified on this list, and, therefore, project development would not be a major source of odors and would not create objectionable odors to surrounding sensitive land uses. Potential impacts would be less than significant.

**LESS THAN SIGNIFICANT IMPACT**

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# 4 Biological Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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Would the project:

- |  |   |   |   |   |
|--|---|---|---|---|
| a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? | ■ | □ | □ | □ |
| b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?   | ■ | □ | □ | □ |
| c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?   | □ | □ | □ | ■ |
| d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?   | ■ | □ | □ | □ |

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Safety Element Update

In order to ensure compliance with state law, the City anticipates amending the Safety Element to formally integrate related long-range planning efforts. Furthermore, updates to the Safety Element would involve updates to safety policies and requirements to provide consistency with the Housing Element Update, including those related to emergency response as part of the Local Hazard Mitigation Plan, which would provide guidance to minimize impacts associated with hazardous and unsafe conditions. Therefore, the Safety Element Update is unlikely to result in any adverse impacts related to biological resources. However, for the purposes of providing more robust analysis and disclosure, this topic will be further discussed in the EIR.

### Housing Element Update

The City has established regulatory requirements to reduce or eliminate impacts to biological resources. The following is a summary of an RCM related to biological resources that the proposed project would be subject to:

- **RCM-WQ-1 (Alteration of a State or Federal Watercourse):** The project is required to comply with the applicable sections of the federal Clean Water Act (CWA) and California's Porter Cologne Water Quality Control Act (Porter Cologne). Prior to the issuance of any grading, use of land, or building permit which may affect an existing watercourse, the applicant is required to consult with the following agencies and obtain all necessary permits and/or authorizations, to the satisfaction of the Department of Building and Safety. Compliance shall be determined through written communication from each jurisdictional agency, a copy of which shall be submitted to the Environmental Review case file for reference:
  - *United States Army Corps of Engineers.* The applicant is required to obtain a Jurisdictional Determination (preliminary or approved), or a letter otherwise



indicating that no permit is required. Contact: Aaron O. Allen, Chief - North Coast Branch, Regulatory *Division*, (805) 585-2148.

- *State Water Resources Control Board*. The applicant is required to consult with the 401 Certification and Wetlands Unit and obtain all necessary permits and/or authorizations, or a letter otherwise indicating that no permit is required. Contact: 401 Certification and Wetlands Unit, Los Angeles Region, 320 W 4th Street, #200, Los Angeles, CA 90013, (213) 576-6759.
  - *California Department of Fish and Wildlife*. The applicant is required to consult with the Lake and Streambed Alteration (LSA) Program and obtain a Streambed Alteration Agreement, or a letter otherwise indicating that no permit is required. Contact: LSA Program, 3883 Ruffin Road, San Diego, CA 92123, (858) 636-3160.
- a. *Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*

### ***Special Status Species***

Special status species are those plants and animals listed, proposed for listing, or candidates for listing as Threatened or Endangered by the United States Fish and Wildlife Service (USFWS) under the Federal Endangered Species Act (FESA); those considered “Species of Concern” by the USFWS; those listed or candidates for listing as Rare, Threatened, or Endangered by the California Department of Fish and Wildlife (CDFW) under the California Endangered Species Act (CESA); animals designated as “Fully Protected” by the California Fish and Game Code (CFGC); animals listed as “Species of Special Concern” (SSC) by the CDFW; CDFW Special Plants, in the CNPS’s Inventory of Rare and Endangered Vascular Plants of California (CNPS 2020); and birds identified as sensitive or watch list species by the Los Angeles County Sensitive Bird Species Working Group (2009).

The City of Los Angeles’ 478 square miles are surrounded by the San Gabriel Mountains to the north, the Santa Susana Mountains, Santa Monica Mountains, and Pacific Ocean to the west, the Pacific Ocean to the South, and the Verdugo Mountains, San Rafael Hills, and San Gabriel Valley to the east. While approximately 214 of 478 square miles in the City are comprised of hills and mountains that provide habitat for wildlife, urbanization has substantially reduced the abundance and diversity of biological resources in Los Angeles. The largest collection of publicly owned natural habitats in the City are the parks and publicly owned open spaces in the San Gabriel, Santa Monica, Verdugo, and Santa Susana Mountains (City of Los Angeles 2001). Remaining native habitat that could support special status species is largely limited to these open space areas in the northern portion of the City, isolated portions of the coast, and limited areas of the Los Angeles River. The central and southern portions of the City are highly urbanized.

The geographic distribution of development would largely occur in areas of the City that are currently zoned for multi-family and commercial development in proximity to transit (see

Figure 2-3). Special status species typically have specific habitat requirements that are lacking in highly developed and disturbed urban areas. However, it is possible that individual project development sites are also identified in any area where the zoning permits residential uses or as part of the Rezoning Program, including lower density residential sites in the vicinity of native habitats or candidates, sensitive, or special status species. Therefore, impacts to such habitats and species would be potentially significant and will be further discussed in an EIR.

### *Nesting Birds*

While common birds are not designated as special status species, destruction of the eggs, nests, and nestlings of any bird (except English sparrows [*Passer domesticus*] and European starlings [*Sturnus vulgaris*]) is prohibited by federal and State law. Sections 3503 and 3513 of the California Fish and Game Code (CGFC) prohibit the taking of specific birds, their nests, eggs, or any portion thereof during the nesting season. Section 3503.5 of the CGFC specifically protects birds of prey, and their nests and eggs, against take, possession, or destruction. Section 3513 of the CGFC incorporates restrictions imposed by the federal Migratory Bird Treaty Act (MBTA) with respect to migratory birds, prohibiting the take or possession of any migratory nongame bird. Disturbance that causes nest abandonment and/or loss of reproductive effort is considered “take” by CDFW.

While the Housing Element Update would not require the construction of new development, the proposed project could allow for the development of new housing, construction for which could occur during the bird nesting season, which is generally from March 1 through August 31 and begins as early as February 1 for raptors. In addition, future Rezoned Sites could be identified within existing developed areas of the City that include vegetation and trees that could support bird nesting. As such, potential construction impacts resulting in vegetation trimming or removal during the nesting season would have the potential to disturb active nests, either directly (e.g., injury, mortality, or disruption of normal nesting behaviors) or indirectly (e.g., construction noise, dust, and vibration from equipment). Such disturbance could constitute a violation of the CGFC and/or MBTA. Therefore, impacts to active bird nests would be potentially significant and will be further discussed in an EIR.

### **POTENTIALLY SIGNIFICANT IMPACT**

- b. *Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*

Plant communities are considered sensitive biological resources if they have limited distributions, high wildlife value, include sensitive species, or are particularly susceptible to disturbance. CDFW maintains a list of sensitive plant communities (CDFW 2019). Riparian habitats in the City include the Los Angeles River and its tributaries, including the Pacoima Wash, Tujunga Wash, and Verdugo Wash. While most of the Los Angeles River corridor is of extremely poor habitat quality, especially in areas where the river channel is completely lined with concrete, a narrow band of willow riparian habitat is located along the bed of the Los

Angeles River in two areas: 1) near the Interstate 5/State Route 134 (I-5/SR-134) interchange, and 2) downstream of Colorado Boulevard. This permanently wet, partially-submerged habitat has a canopy of mid-sized willows and a dense understory of reeds and non-native weeds. Natural communities along the river include the Southern Willow Scrub, Southern Mixed Riparian Forest, and Southern Cottonwood-Willow Riparian Forest. Other areas in the City that presently support riparian habitat include the Sepulveda Basin, Glendale Narrows. The 225-acre Sepulveda Basin Wildlife Preserve is the only officially designated wildlife area along the river in the City. Key indicator species found within these areas include a variety of mammals and birds, such as coyote, shrike, acorn woodpeckers, and California quail (City of Los Angeles 2017). In addition, most of the Santa Monica Mountains east of U.S. Route 101 (U.S. 101), including Griffith Park, is part of the Griffith Park Significant Ecological Areas (SEA), which has the potential to support sensitive natural communities and riparian vegetation.

It is possible that sites are identified in any area where the zoning permits residential uses or as part of the Rezoning Program, including lower density residential sites with proximity to riparian habitat or other sensitive natural community. As such, impacts to sensitive natural communities or riparian habitats would be potentially significant and will be further discussed in an EIR.

#### POTENTIALLY SIGNIFICANT IMPACT

- c. *Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*

In accordance with Section 1602 of the CFGC, the CDFW has jurisdiction over lakes and streambeds (including adjacent riparian resources). CDFW regulates wetland areas only to the extent that those wetlands are part of a river, stream, or lake. Under Section 404 of the Clean Water Act (CWA), the United States Army Corps of Engineers (USACE) has authority to regulate activities that discharge dredge or fill material into wetlands or other “waters of the United States” through issuance of a Section 404 Permit. Finally, the Regional Water Quality Control Board (RWQCB) has jurisdiction over “waters of the state” pursuant to the Porter-Cologne Water Quality Control Act and has the responsibility for review of the project water quality certification per Section 401 of the federal CWA.

Wetlands in the City are associated with springs, streams, rivers (e.g., Tujunga Wash) and lakes, as well as the ocean (City of Los Angeles 2001). The largest coastal wetland, Ballona Wetlands, is in the Westchester-Playa del Rey community (City of Los Angeles 2001). The Ballona Wetlands is an identified Significant Ecological Area (SEA) that provides approximately 153 acres of wetland habitat and 83 acres of non-wetland waters (CDFW 2017). The Ballona Wetlands provides a variety of habitat types and is home to a variety of wildlife and plant species (CDFW 2017). The Venice Canal System, in the Venice community, is also an important part of the wetlands system as its canals connect to the Pacific Ocean (City of Los Angeles 2001). Furthermore, the soft-bottomed portion of the Los Angeles River provides

wetland habitat, though it too is degraded in many areas and dominated by non-native plant communities.

The Housing Element Update would prioritize development along commercial corridors and existing residential neighborhoods located in proximity to existing public infrastructure and would not directly or indirectly result in the direct modification of wetlands or jurisdictional waters. Nonetheless, any future projects would be required to comply with RCM RC-WQ-1 (Alteration of a State or Federal Watercourse) to ensure that impacts to jurisdictional waters and wetlands would be less than significant. In addition, the City's Stormwater and Urban Runoff Pollution Control Ordinance would require future development to comply with the City's Standard Urban Stormwater Mitigation Plan (SUSMP) requirements, including the inclusion of best management practices (BMPs) in a project's design to prevent, control, and reduce stormwater pollutants, if applicable; integrate LID practices and standards for stormwater pollution mitigation; and maximize open, green, and pervious space on all development consistent with the City's landscape ordinance and other related requirements. Such compliance of future development would ensure that construction does not violate any water quality standards or discharge requirements or otherwise substantially degrade water quality of wetlands or other jurisdictional waters. As a result, implementation of the Housing Element Update would have a less than significant impact on State or federally-protected wetlands.

#### **LESS THAN SIGNIFICANT IMPACT**

- d. Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?*

Wildlife corridors are generally defined as connections between habitat patches that allow for physical and genetic exchange between otherwise isolated animal populations. Such linkages may serve a local purpose, such as between foraging and denning areas, or they may be regional in nature, allowing movement across the landscape. Some habitat linkages may serve as migration corridors, wherein animals periodically move away from an area and then subsequently return. Examples of barriers or impediments to movement include housing and other urban development, roads, fencing, unsuitable habitat, or open areas with little vegetative cover. Regional and local wildlife movements are expected to be concentrated near topographic features that allow convenient passage, including roads, drainages, and ridgelines.

Habitat fragmentation occurs when a proposed action results in a single, unified habitat area being divided into two or more areas in such a way that the division isolates the two new areas from each other. Isolation of habitat occurs when wildlife cannot move freely from one portion of the habitat to another or from one habitat type to another, as in the fragmentation of habitats within and around "checkerboard" residential development. Habitat fragmentation also can occur when a portion of one or more habitats is converted into another habitat, as when annual burning converts scrub habitats to grassland habitats.

In Los Angeles, landscapes that contribute to wildlife corridors and/or nursery sites are concentrated primarily in large, contiguous open space areas with native habitats such as those located in the surrounding mountains: San Gabriel, Santa Monica, Verdugo, and Santa Susana Mountains. Those wildlife corridors on the borders of the City link to regional corridors, including the Angeles National Forest to the north and Topanga State Park to the west (Los Angeles County 2009). Local wildlife movement may occur along watercourses, such as the Los Angeles River; though such movement would likely be limited given the channelized nature of much of the river and its urban surroundings. Limited wildlife movement could also occur along uninterrupted areas of coastline in the City. Otherwise, because much of Los Angeles is either urban or suburban in nature, wildlife corridors and nursery sites are not present in much of the City.

Project development would largely occur in areas of the City that are currently zoned for multi-family and commercial development in proximity to transit. The encouragement of dense development on infill sites near transit hubs and corridors under the proposed project would not result in impacts to potential local wildlife movement along watercourses, such as the Los Angeles River, or on the coastline. However, it is possible that individual development sites are also located in any area where the zoning permits residential uses or as part of the Rezoning Program, including lower density residential or hillside sites in the vicinity of native habitats and potential wildlife corridors. Therefore, impacts to wildlife movements or established migratory corridors would be potentially significant and will be further discussed in an EIR.

#### **POTENTIALLY SIGNIFICANT IMPACT**

- e. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*

#### **City of Los Angeles General Plan**

The Framework Element is intended to guide the City's long-range growth and development. Chapter 6, *Open Space and Conservation*, of the Framework Element includes goals, objectives, and policies for the provision, management, and conservation of the City's open space resources, including SEAs, wildlife corridors, and natural animal ranges. The General Plan Conservation Element addresses endangered species, habitats, wildlife corridors, and wetlands occurring in the City and identifies policies intended to protect, restore, and enhance these biological resources (City of Los Angeles 2001). Furthermore, future development projects would be required to comply with zoning and overlays that implement General Plan goals and policies, as well as specific plan or community plan development regulations, intended to protect biological resources, such as trees. Therefore, the Housing Element Update would be consistent with the goals and policies of the General Plan regarding sensitive biological resources and impacts would be less than significant.

### ***Protected Trees and Heritage Trees***

According to Articles 2 and 7 of Chapter I, Article 6 of Chapter IV, and Section 96.303.5 of the LAMC and City Ordinance No. 177404 (Protected Tree Ordinance, City of Los Angeles 2006b), any of the following southern California native tree species measuring four inches or more in diameter at breast height (DBH; cumulative total for multi-trunks) is considered a protected tree species within City limits: valley oak (*Quercus lobata*), California live oak (*Quercus agrifolia*), or any other *Quercus* sp. tree indigenous to California, except for scrub oak (*Quercus dumosa*); southern California black walnut (*Juglans californica* var. *californica*); western sycamore (*Platanus racemosa*); and California bay (*Umbellularia californica*). Blue elderberry (*Sambucus nigra* ssp. *caerulea*) and toyon (*Heteromeles arbutifolia*) are proposed to be added to the protected trees list, but such an amendment has not yet been formally adopted by the Los Angeles City Council (City of Los Angeles 2018a).

Heritage trees are individual trees of any size or species that are specially designated by the Los Angeles Department of Recreation and Parks (DRP) as “heritage” because of their historical, commemorative, or horticultural significance. The nomination and determination of heritage trees is an internal process within DRP. Nominations are generally made by DRP staff members or community members. The City of Los Angeles maintains an inventory of heritage trees that the City intends to maintain and preserve on City properties, including parks. Heritage trees are not required to be one of the protected tree types covered by the Protected Tree Ordinance. The list of heritage trees can be viewed on NavigateLA on the City’s DRP website. Because heritage trees are located on City parks and recreational facilities, as well as in public rights-of-way, DRP is responsible for the maintenance and protection of these trees from injury. The list of heritage trees remains open for new designations and provides information to DRP staff regarding the importance of their actions while planning activities near heritage trees.

Heritage trees can be found on a number of City parks and protected tree species may be found on individual public or private properties throughout the City. Future development resulting from the implementation of the Housing Element Update is not expected to affect heritage trees since these trees are located on public property and DRP is responsible for their maintenance and protection from injury.

Some protected trees may be located on private property where development of new housing units could occur. The City’s Protected Tree Ordinance makes it illegal to relocate, remove, or fatally harm protected trees without the issuance of a permit by the Los Angeles Department of Public Works (DPW) prior to development. In the event that the LADPW approves removal of a protected tree, replacement of the tree would be required. The current City of Los Angeles Urban Forestry Division policy requires, at a minimum, protected tree replacement at a four to one ratio.

## Local Coastal Programs

### *Venice Coastal Zone Specific Plan*

The City of Los Angeles does not have a certified Local Coastal Program for the Venice community, but the City has adopted the Venice Coastal Zone Specific Plan. This Specific Plan consists of land use plans, zoning ordinances, zoning district maps, and other implementing actions intended to implement the provisions and policies of the California Coastal Act at the local level. The Specific Plan is predominantly a land use plan, but it also addresses water and marine resource issues relating to regulation of storm water runoff, tidal circulation, and protection and enhancement of environmentally sensitive habitat areas within the Venice Coastal Zone (City of Los Angeles 1999).

### *San Pedro Local Coastal Program*

The City of Los Angeles does not have a certified Local Coastal Program for the San Pedro community, but the City has adopted the San Pedro Coastal Land Use Plan and the San Pedro Specific Plan. The San Pedro Specific Plan and the San Pedro Coastal Land Use Plan contain land use and development regulations to protect, maintain, enhance, and restore the overall quality of the San Pedro Coastal Zone while meeting provisions of the California Coastal Act (City of Los Angeles 2013).

The Housing Element Update does not include any components that would preclude implementation of or alter the above-described policies, plans, or procedures. Thus, implementation of the Housing Element Update would not conflict with any local policies or ordinances protecting biological resources, including protected trees. Impacts related to local policies or ordinances protecting biological resources would be less than significant.

## LESS THAN SIGNIFICANT IMPACT

- f. *Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?*

The Natural Community Conservation Act (NCCA) (CFG Chapter 10, Division 3, Sections 2800 et seq.) was enacted in 1991. The NCCA is administered by CDFW. The goal of this Act is to identify and secure habitat areas for protection of biodiversity. Habitat areas are identified by CDFW, and plans are prepared for habitat protection. When a development project is proposed, a determination is made concerning the potential impacts of the project on biodiversity and the best means of avoiding or mitigating them. NCCA allows local, State or federal agencies to enter into agreements with public and private entities to implement a "natural community conservation plan" (NCCP), e.g., habitat and species protection within a specified geographic area. Participation in an NCCP does not exempt a development project from CEQA. Mitigation measures pursuant to CEQA may, as an alternative, include participation in an NCCP in order to reduce the burden for on-site mitigation.

Habitat Conservation Plans (HCPs), designated under the FESA Section 10(a)(1)(B), are federal planning documents designed to conserve the ecosystems upon which listed species depend, ultimately contributing to their recovery. HCPs require a “take permit” when a project will affect a species identified as listed, non-listed or eligible under the act and detail how those impacts will be minimized or mitigated; and how the HCP is to be funded (USFWS 2020). No HCPs or NCCPs apply to the City (City of Los Angeles 2015a). Therefore, no impact would occur.

**NO IMPACT**



## 5 Cultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	■	<input type="checkbox"/>

### Safety Element Update

In order to ensure compliance with state law, the City anticipates amending the Safety Element to formally integrate related long-range planning efforts. Furthermore, updates to the Safety Element would involve updates to safety policies and requirements to provide consistency with the Housing Element Update, including those related to emergency response as part of the Local Hazard Mitigation Plan, which would provide guidance to minimize impacts associated with hazardous and unsafe conditions. Therefore, the Safety Element Update would not result in any adverse impacts related to cultural resources.

### Housing Element Update

CEQA requires a lead agency to determine whether a project may have a significant effect on historical resources (PRC Section 21084.1) and tribal cultural resources (PRC Section 21074 [a][1][A]-[B]). Tribal cultural resources are discussed in Section 18, *Tribal Cultural Resources*, of this Initial Study.

A historical resource is a resource listed in, or determined to be eligible for listing in, the California Register of Historical Resources (CRHR); a resource included in a local register of historical resources; or any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant (State CEQA Guidelines, Section 15064.5[a][1-3]). A resource shall be considered historically significant if it:

- Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;

- Is associated with the lives of persons important in our past;
- Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
- Has yielded, or may be likely to yield, information important in prehistory or history.

In addition, if it can be demonstrated that a project would cause damage to a unique archaeological resource, CEQA recommends that the lead agency require reasonable efforts be made to permit any or all of these resources to be preserved in place or left in an undisturbed state to avoid a significant impact. To the extent that resources cannot be left undisturbed, additional or alternative mitigation measures should be required (PRC, Section 21083.2[a], [b]).

PRC, Section 21083.2(g) defines a unique archaeological resource as an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it:

- Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information;
- Has a special and particular quality such as being the oldest of its type or the best available example of its type; or
- Is directly associated with a scientifically recognized important prehistoric or historic event or person.

The City has established regulatory requirements for the treatment of cultural resources. The following are summaries of RCMs related to cultural resources that the proposed project would be subject to:

- **RCM-CR-1 (Permits for Historical and Cultural Buildings):** The project is required to comply with all applicable standards of LAMC Section 91.106.4.5 which provides procedures for the demolition, alteration, or removal of buildings or structures of historical, archaeological, or architectural consequence, including environmental review and permitting requirements for structures designated by local action or designated or identified as historical by State or federal action.
- **RCM-CR-2 (Human Remains):** If human remains are encountered unexpectedly during construction demolition and/or grading activities, State Health and Safety Code Section 7050.5 requires that no further disturbance is to occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98 for Native American human remains if necessary. In the event that human remains are discovered during excavation activities, the following procedures would be observed:

- Stop immediately and contact the County Coroner:

1104 N. Mission Road

Los Angeles, CA 90033

323-343-0512 (8 a.m. to 5 p.m. Monday through Friday) or

323-343-0714 (After Hours, Saturday, Sunday, and Holidays)

If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the Native American Heritage Commission (NAHC).

The NAHC will immediately notify the person it believes to be the most likely descendent of the deceased Native American.

- The most likely descendent has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods.
  - If the owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the NAHC.
- a. *Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?*

Survey LA, the Los Angeles Historic Resources Survey, serves as the primary planning tool for identifying, recording, and evaluating historical resources, whether individual resources or potential districts, in the City. Field surveys conducted from 2010 through 2017 covered the entire City across over 880,000 legal parcels in an area of almost 500 square miles. The survey identified approximately 25,000 resources, including 29 Los Angeles Historic Preservation Overlay Zones, 430 historic districts, 1,065 L.A. Historic Cultural Monuments and 300 places designated by the National Register of Historic Places (Office of Historic Resources 2020). The Housing Element Update and Rezoning Program would prioritize the development of new housing on infill sites in areas with existing public transit infrastructure. Some of these infill sites may contain potential historical resources, including those identified by Survey LA as potentially eligible for listing in the CRHR, or resources already designated as an Historical Cultural Monument or in an HPOZ, or designated on the State register, the demolition or alteration of which could constitute a significant impact, even with compliance with RCM-CR-1. Therefore, project development has the potential to impact historical resources and this issue will be further analyzed in an EIR.

#### **POTENTIALLY SIGNIFICANT IMPACT**

- b. *Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?*

The Housing Element and Rezoning Program would prioritize the development of new housing along transit corridors in areas with existing public transit infrastructure and in areas have previously been developed and disturbed. Therefore, on future development sites under the proposed project, it is likely that prior grading, construction, and modern use of the sites would have either removed or destroyed archaeological resources within surficial soils. Nonetheless, there is the potential for archaeological resources to exist below the ground surface throughout the City, which could be disturbed by grading and excavation activities associated with new housing development. Therefore, project development has the potential to impact archaeological resources and this issue will be discussed further in an EIR.

#### **POTENTIALLY SIGNIFICANT IMPACT**

- c. *Would the project disturb any human remains, including those interred outside of formal cemeteries?*

RCM-CR-2 (Human Remains) recognizes the requirements of California Health and Safety Code, Section 7050.5; which mandates the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery. If human remains are found during project construction, existing regulations outlined in the State of California Health and Safety Code Section 7050.5 state that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98. In the event of an unanticipated discovery of human remains, the County Coroner must be notified within 24 hours of identification as human. If the human remains are determined to be prehistoric, the Coroner will notify the NAHC, which will determine and notify a most likely descendant (MLD). The MLD shall complete the inspection of the site within 48 hours of being granted access and provide recommendations as to the treatment of the remains to the landowner. Any soil disturbing activities from project development would be required to adhere to existing laws regarding the discovery of humans, which would minimize potential impacts to human remains, and impacts would be less than significant.

#### **LESS THAN SIGNIFICANT IMPACT**

## 6 Energy

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### Safety Element Update

In order to ensure compliance with state law, the City anticipates amending the Safety Element to formally integrate related long-range planning efforts. Furthermore, updates to the Safety Element would involve updates to safety policies and requirements to provide consistency with the Housing Element Update, including those related to emergency response as part of the Local Hazard Mitigation Plan, which would provide guidance to minimize impacts associated with hazardous and unsafe conditions. Therefore, the Safety Element Update would not result in any adverse impacts related to energy.

### Housing Element Update

California is one of the lowest per capita energy users in the United States, ranked 48th in the nation, due to its energy efficiency programs and mild climate. In 2018, California consumed 681 million barrels of petroleum, 2,137 billion cubic feet of natural gas, and one million short tons of coal in 2018 (United States Energy Information Administration [EIA] 2020). The single largest end-use sector for energy consumption in California is transportation (39.8 percent), followed by industry (23.7 percent), commercial (18.9 percent), and residential (17.7 percent) (EIA 2020).

Most of California's electricity is generated in-state with approximately 30 percent imported from the northwest and southwest in 2018. In addition, approximately 30 percent of California's electricity supply comes from renewable energy sources, such as wind, solar photovoltaic, geothermal, and biomass (California Energy Commission 2019). Adopted on September 10, 2018, Senate Bill (SB) 100 accelerates the State's Renewables Portfolio Standards Program by requiring electricity providers to increase procurement from eligible renewable

energy resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045.

To reduce statewide vehicle emissions, California requires all motorists use California Reformulated Gasoline, which is sourced almost exclusively from in-state refineries. Gasoline is the most used transportation fuel in California with 15.6 billion gallons sold in 2018 and is used by light-duty cars, pickup trucks, and sport utility vehicles (California Department of Tax and Fee Administration 2019). Diesel is the second most used fuel in California with 4.2 billion gallons sold in 2015 and is used primarily by heavy duty-trucks, delivery vehicles, buses, trains, ships, boats and barges, farm equipment, and heavy-duty construction and military vehicles (California Energy Commission 2016).

- a. *Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?*

As discussed in *Proposed Project*, project development involves the potential construction and operation of between 419,261 and 429,261 housing units to meet the City's RHNA. Based on the City's existing growth strategy, most development sites are likely to be identified along commercial corridors and existing multi-family neighborhoods located already served by energy providers. Nonetheless, project development would consume energy during construction and operation through the use of petroleum fuel, natural gas, and electricity, as further addressed below.

## **Construction**

Energy use during construction associated with project development would be in the form of fuel consumption (e.g., gasoline and diesel fuel) to operate heavy equipment, light-duty vehicles, machinery, and generators for lighting. In addition, temporary grid power may also be provided to construction trailers or electric construction equipment. Energy use during the construction of individual projects would be temporary in nature, and equipment used would be typical of construction projects in the region. In addition, construction contractors would be required to demonstrate compliance with applicable California Air Resources Board (CARB) regulations that restrict the idling of heavy-duty diesel motor vehicles and govern the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. Construction activities associated with project development would be required to utilize fuel-efficient equipment consistent with State and federal regulations and would comply with State measures to reduce the inefficient, wasteful, or unnecessary consumption of energy. In addition, individual projects would be required to comply with construction waste management practices to divert construction and demolition debris, pursuant to the Citywide Construction and Demolition Waste Recycling Ordinance.

These practices would result in efficient use of energy during construction of future development under the proposed project. Furthermore, in the interest of both environmental awareness and cost efficiency, construction contractors would not utilize fuel in a manner that is wasteful or unnecessary. Therefore, future construction activities associated with project development would not result in potentially significant environmental effects due to the wasteful, inefficient, or unnecessary consumption of energy, and impacts would be less than significant.

## **Operation**

Project development would require permanent grid connections for electricity and natural gas service to power internal and exterior building lighting, and heating and cooling systems. As previously discussed, the Housing Element Update would prioritize new development in urban portions of the City that are already served by energy providers. Electricity service in the City is provided by the Los Angeles Department of Water and Power (LADWP) and Southern California Edison (SCE). Southern California Gas Company (SoCal Gas) provides natural gas services to residents and businesses in the City.

Project development would be subject to the energy conservation requirements of the California Energy Code (Title 24, Part 6 of the California Code of Regulations, California's Energy Efficiency Standards for Residential and Nonresidential Buildings), the California Green Building Standards Code (Title 24, Part 11 of the California Code of Regulations), and the Los Angeles Green Building Code (LAMC Chapter IX, Article 9). The California Energy Code provides energy conservation standards for all new and renovated commercial and residential buildings constructed in California. This Code applies to the building envelope, space-conditioning systems, and water-heating and lighting systems of buildings and appliances and provides guidance on construction techniques to maximize energy conservation. Minimum efficiency standards are given for a variety of building elements, including appliances; water and space heating and cooling equipment; and insulation for doors, pipes, walls, and ceilings. The Code emphasizes saving energy at peak periods and seasons and improving the quality of installation of energy efficiency measures. The California Green Building Standards Code sets targets for energy efficiency; water consumption; dual plumbing systems for potable and recyclable water; diversion of construction waste from landfills; and use of environmentally sensitive materials in construction and design, including ecofriendly flooring, carpeting, paint, coatings, thermal insulation, and acoustical wall and ceiling panels. New developments would also be required to comply with the Los Angeles Green Building Code, which contains mandatory measures for residential and non-residential uses, particularly those related to energy efficiency (i.e., renewable energy, indoor and outdoor water use, and water reuse systems).

In addition, the Housing Element Update would prioritize developing new housing units in close proximity to high quality transit areas and existing commercial/retail, recreational, and institutional land uses, which would reduce trip distances and encourage the use of alternative modes of transportation such as bicycling and walking. These factors would minimize the potential of the proposed project to result in the wasteful or unnecessary

consumption of vehicle fuels. As a result, operation of project development would not result in potentially significant environmental effects due to the wasteful, inefficient, or unnecessary consumption of energy, and impacts would be less than significant.

#### LESS THAN SIGNIFICANT IMPACT

- b. *Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?*

The City of Los Angeles adopted Green LA: An Action Plan to Lead the Nation in Fighting Global Warming (Green LA), in May 2007 (City of Los Angeles 2007). Green LA set the goal of reducing the City's GHG emissions to 35 percent below 1990 levels by 2030. The emphasis of Green LA is on municipal facilities and operations followed by programs to reduce emissions in the community. To facilitate implementation of Green LA, the City adopted the Los Angeles Green Building Code, which future developments in accordance with the Housing Element Update would be required to implement. Green LA is also being implemented through Climate LA, which provides detailed information about each action item discussed in the Green LA framework. Action items range from harnessing wind power for electricity production and energy efficiency retrofits in buildings to converting the City's fleet vehicles to cleaner and more efficient models and reducing water consumption.

In addition, LADWP will continue to implement programs to emphasize water conservation and pursue procurements of alternative local water supplies, including recycled water and storm water capture, which would reduce energy consumed by treating and transporting water. Furthermore, the City implemented the Recovering Energy, Natural Resources and Economic Benefit from Waste for Los Angeles (RENEW LA) plan to meet solid waste reduction goals by expanding recycling to multi-family dwellings, commercial establishments, and restaurants (City of Los Angeles 2006). Under the RENEW LA Plan, the City is developing facilities to convert solid waste to energy without incineration. These measures would collectively serve to increase energy efficiency and reduce overall energy use in the City.

On April 8, 2015, Los Angeles released the Sustainable City pLAn, which covers a multitude of environmental, social, and economic sustainability issues related to GHG emissions reductions, either specifically or by association (City of Los Angeles 2015b). In 2019, the City prepared the L.A. Green New Deal/2019 Sustainability Plan, which provides an expanded vision of the Sustainable City pLAn, focusing on securing clean air and water and a stable climate, improving community resilience, expanding access to healthy food and open space, and promoting environmental justice for all. Through the L.A. Green New Deal/2019 Sustainability Plan, the City would reduce an additional 30 percent in GHG emissions above and beyond the 2015 pLAn and ensures that the City stays within its carbon budget between 2020 and 2050 (City of Los Angeles 2019). In addition, the proposed project's emphasis on infill development in areas with access to jobs and high-quality public transit is consistent with applicable strategies for reducing VMT and vehicle fuel consumption from the SCAG 2020 RTP/SCS (SCAG 2020a). Facilitating housing development in proximity to transit and



job centers along, with regulatory compliance, would ensure that the proposed project would not conflict with renewable energy and energy efficiency plans adopted by the City. As such, the project would not conflict with or obstruct a plan for renewable energy or energy efficiency, and impacts would be less than significant.

**LESS THAN SIGNIFICANT IMPACT**

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# 7 Geology and Soils

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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Would the project:

- |   |                          |                          |                                     |                          |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:  |                          |                          |                                     |                          |
| 1. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?             | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 2. Strong seismic ground shaking?   | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 3. Seismic-related ground failure, including liquefaction?  | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 4. Landslides?  | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Result in substantial soil erosion or the loss of topsoil?   | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d. Be located on expansive soil, as defined in Table 1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?  | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### Safety Element Update

In order to ensure compliance with state law, the City anticipates amending the Safety Element to formally integrate related long-range planning efforts. Furthermore, updates to the Safety Element would involve updates to safety policies and requirements to provide consistency with the Housing Element Update, including those related to emergency response as part of the Local Hazard Mitigation Plan, which would provide guidance to minimize impacts associated with hazardous and unsafe conditions. Therefore, the Safety Element Update would not result in any adverse impacts related to geology and soils.

### Housing Element Update

The City has extensive and comprehensive regulations to avoid geologic hazards and soil management during construction of projects. Project development would be subject to the following RCMs relevant to geology and soils:

- **RCM-GEO-1 (Seismic):** The design and construction of development are required to conform to the California Building Code (CBC) seismic standards as approved by the Department of Building and Safety.
- **RCM-GEO-2 (Hillside Grading Area):** Grading plans are required to conform with the City's Landform Grading Manual guidelines, subject to approval by the Advisory Agency and the Department of Building and Safety's Grading Division. Appropriate erosion control and drainage devices are required to be provided to the satisfaction of the Building and Safety Department. These measures include interceptor terraces, berms, vee-channels, and inlet and outlet structures, as specified by Section 91.7013 of the Building Code, including planting fast-growing annual and perennial grasses in areas where construction is not immediately planned.
- **RCM-GEO-3 (Landslide Area):** Prior to the issuance of grading or building permits, applicants are required to submit a geotechnical report, prepared by a registered civil engineer or certified engineering geologist, to the Department of Building and Safety, for

review and approval. The geotechnical report needs to assess potential consequences of any landslide and soil displacement, estimation of settlement, lateral movement or reduction in foundation soil-bearing capacity and discuss mitigation measures that may include building design consideration. Building design considerations are required to include at minimum:

- ground stabilization
  - selection of appropriate foundation type and depths
  - selection of appropriate structural systems to accommodate anticipated displacements or any combination of these measures
  - Developments are required to comply with the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter for a development, and as it may be subsequently amended or modified.
- **RCM-GEO-4 (Liquefaction Area):** Developments are required to comply with the Uniform Building Code (UBC) Chapter 18. Division 1 Section 1804.5 Liquefaction Potential and Soil Strength Loss. Prior to the issuance of grading or building permits, the applicant is required to submit a geotechnical report, prepared by a registered civil engineer or certified engineering geologist, to the Department of Building and Safety, for review and approval. The geotechnical report needs to assess potential consequences of any liquefaction and soil strength loss, estimation of settlement, lateral movement or reduction in foundation soil-bearing capacity, and discuss mitigation measures that may include building design consideration. Building design considerations shall include, but are not limited to:
    - ground stabilization
    - selection of appropriate foundation type and depths
    - selection of appropriate structural systems to accommodate anticipated displacements or any combination of these measures.
    - Developments are required to comply with the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter for the proposed project, and as it may be subsequently amended or modified.
- **RCM-GEO-5 (Subsidence Area):** Prior to the issuance of building or grading permits, the applicant is required to submit a geotechnical report prepared by a registered civil engineer or certified engineering geologist to the written satisfaction of the Department of Building and Safety. The geotechnical report needs to assess potential consequences of any subsidence and soil strength loss, estimation of settlement, lateral movement or reduction in foundation soil-bearing capacity and discuss mitigation measures that may include building design consideration. Building design considerations need to include, but are not limited to, ground stabilization, selection of appropriate foundation type and depths, selection of appropriate structural systems to accommodate anticipated displacements or any combination of these measures. Development is required to comply with the conditions contained within the Department of Building and Safety's Geology

and Soils Report Approval Letter for the proposed project, and as it may be subsequently amended or modified.

- **RCM-GEO-6 (Expansive Soils Area):** Prior to the issuance of grading or building permits, the applicant is required to submit a geotechnical report, prepared by a registered civil engineer or certified engineering geologist, to the Department of Building and Safety, for review and approval. The geotechnical report needs to assess potential consequences of any soil expansion and soil strength loss, estimation of settlement, lateral movement or reduction in foundation soil-bearing capacity and discuss mitigation measures that may include building design consideration. Building design considerations need to include, but are not limited to, ground stabilization, selection of appropriate foundation type and depths, selection of appropriate structural systems to accommodate anticipated displacements or any combination of these measures. Developments are required to comply with the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter for each project development and as it may be subsequently amended or modified.
- **RCM-GEO-7 (Low Impact Development):** Developments are required to comply with the applicable provisions of the City's Low Impact Development (LID) Ordinance (Ordinance No. 181899, updated September 2015) and LID Handbook for the purpose of improving water quality by minimizing urban runoff and soil erosion.
- **RCM-GEO-8 (Grading, Excavations, and Fills):** Developments are required to comply with the applicable provisions of LAMC Chapter IX, Division 70, which established the requirements for a grading permit from the Department of Building and Safety. Grading permits require all projects to implement BMPs during grading and excavation to reduce soil erosion during construction.

- a.1. *Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?*
- a.2. *Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?*

The City is located in a seismically active region of southern California. Major active faults in the area include the San Andreas, Whittier-Elsinore, Newport-Inglewood, Hollywood, and Raymond Fault zones. In addition to these known faults, movement along buried blind thrust faults that have no obvious surface features can also occur, such as during the Northridge earthquake (City of Los Angeles 1996). According to the DOC Earthquake Zones of Required Investigation map, the City contains areas at risk of seismically induced liquefaction, as well as hillsides around the Santa Monica Mountains subject to landslide (DOC 2020a). Furthermore, in a letter received by the City from the DOC's California Geological Survey (CGS) on July 16, 2020, the DOC CGS provided details regarding emerging scientific information for the Hollywood Fault (DOC 2020b). A May 8, 2020 analysis by the United States Geological Survey (USGS) in which multiple seismic datasets and models strongly

suggest active, near-surface fault traces of the Hollywood Fault not previously mapped by the DOC's CGS in the 2014 Hollywood Earthquake Fault Zone Map. Therefore, project development could occur in areas with the potential for fault rupture and seismic ground shaking, and associated risk of loss, injury, or death; however, potential projects would not involve mining operations that require deep excavations thousands of feet into the earth, or boring of large areas that could create unstable seismic conditions or stresses in the Earth's crust. As such, the proposed project would not directly or indirectly cause or increase potential substantial adverse effects involving the rupture of a known earthquake fault or strong seismic ground shaking.

The proposed project would involve new construction, potentially including larger, taller buildings and more dense development that could experience substantial damage during seismic ground shaking events. However, before a project can be permitted within a mapped Alquist-Priolo Earthquake Fault Zone, the City requires completion of a geologic investigation that demonstrates proposed buildings for human occupancy would not be constructed on or within 50 feet of an active fault trace. Future project development would also be subject to RCM-GEO-1 through RCM-GEO-6, as well as federal, State, and local regulations in place for the purpose of mitigating seismic risks.

As required by Chapter 16 of the CBC, for the construction of new buildings or structures, specific engineering design and construction measures would be implemented to minimize the potential for adverse impacts to human life and property caused by seismically induced ground shaking or fault rupture. Chapter 33 of the CBC requires all new development to comply with specific geologic design parameters and geotechnical recommendations, which would be incorporated into individual development projects to minimize the potential for adverse impacts. In addition, Policy 1.1.6 of the Safety Element of the City General Plan encourages development to comply with applicable State and federal planning and development regulations, including the Alquist-Priolo Earthquake Fault Zoning Act and the Seismic Hazards Mapping Act. Compliance with applicable regulations and policies would foreseeably minimize the risk of exposure to hazards associated with fault rupture and seismic ground shaking and project development would not increase the potential for fault rupture or ground shaking. Impacts would be less than significant.

#### **LESS THAN SIGNIFICANT IMPACT**

*a.3. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?*

Liquefaction is a phenomenon in which loose, saturated, granular soils behave similarly to a fluid when subjected to high-intensity ground shaking. Liquefaction occurs when three general conditions exist: shallow groundwater; low density, fine, clean sandy soils; and strong ground motion. Liquefaction-related effects include loss of bearing strength, amplified ground oscillations, lateral spreading, and flow failures.

Project development would be subject to RCM-GEO-4 (Liquefaction Area), which requires applicants to submit a geotechnical investigation to determine the potential for liquefaction

on a project site. Developments would be required to comply with current engineering practices as reflected in the City of Los Angeles Building Code (Chapter IX), the IBC, and the CBC. The IBC and CBC regulate the design and construction of excavations, foundations, building frames, retaining walls, and other building elements to mitigate the effects of any adverse soil conditions. UBC Chapter 18 Division 1 Section 1804.5 requires the submittal of a geotechnical report, prepared by a registered civil engineer or certified engineering geologist, to the Los Angeles Department of Building and Safety (LADBS), for review and approval.

The required geotechnical investigation must assess potential consequences of any liquefaction and soil strength loss, estimation of settlement, lateral movement or reduction in foundation soil-bearing capacity and discuss mitigation measures that may include building design consideration. Building design considerations shall include, but are not limited to: ground stabilization, selection of appropriate foundation type and depths, selection of appropriate structural systems to accommodate anticipated displacements, or any combination of these measures. Compliance with City and State building codes would reduce seismic ground shaking impacts with current engineering practices and the project would not exacerbate liquefaction potential in the area. As such, the proposed project would not directly or indirectly cause substantial adverse effects from liquefaction risk and impacts would be less than significant.

#### **LESS THAN SIGNIFICANT IMPACT**

*a.4. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?*

Landslides generally occur in loosely consolidated, wet soil and/or rocks on steep sloping terrain. Areas of the City in landslide hazard zones are concentrated near the hillsides of the Santa Monica Mountains, in low-density residential areas (DOC 2020c). The Housing Element Update would emphasize growth in urban areas of the City, away from existing low-density residential areas subject to seismically induced landslides. Nonetheless, any excavations associated with project development would be required to be sloped or properly shored in accordance with the applicable provisions of the City of Los Angeles Building Code and if development did occur in a landslide area, those projects would be subject to the regulations described in RCM-GEO-3 (Landslide Area). Therefore, project development would not directly or indirectly cause substantial adverse effects resulting from landslides and potential impacts would be less than significant.

#### **LESS THAN SIGNIFICANT IMPACT**



b. *Would the project result in substantial soil erosion or the loss of topsoil?*

Soil erosion or the loss of topsoil may occur when soils are disturbed but not secured or restored, such that wind or rain events may mobilize disturbed soils, resulting in their transport offsite. The Housing Element Update emphasizes the development of new housing units on previously disturbed, infill areas. Because the Housing Element Update would prioritize new housing in areas that are already built out, the potential for erosion would primarily be limited to temporary effects of possible topsoil loss at future project construction sites.

Ground-disturbing activities associated with the construction of Project development would have the potential to result in the removal and erosion of topsoil during grading and excavation. For construction activities, Section D of LAMC Article 4.4, *Stormwater and Urban Runoff Pollution Control*, requires owners or developers to implement stormwater pollution control requirements for construction activities depicted in the project plans, which are subject to approval by the Department of Building and Safety. The BMPs would be in accordance with the provisions contained in the "Planning and Land Development Handbook For Low Impact Development (LID), Part B Planning Activities" and would be designed to capture and treat runoff from construction sites such as through stabilization of construction entrance roadways and on-site retention of eroded sediments and pollutants. In addition, projects would be subject to the regulations described in RCM-GEO-7 and RCM-GEO-8, which include requirements to minimize potential adverse impacts associated with water quality and soil erosion. Construction activities would also be required to comply with CBC Chapter 70 standards, which are designed to ensure implementation of appropriate measures during grading and construction to control erosion and storm water pollution.

Construction activities that disturb one or more acres of land are subject to the National Pollutant Discharge Elimination System (NPDES) General Construction Permit process, which would require development of a Stormwater Pollution Prevention Plan (SWPPP) that outlines project-specific BMPs to control erosion, sediment release, and otherwise reduce the potential for discharge of pollutants from construction into stormwater. Typical BMPs include, but are not limited to, installation of silt fences, erosion control blankets, and anti-tracking pads at site exits to prevent off-site transport of soil material. Therefore, erosion from demolition and construction activities associated with project development would be controlled through implementation of the requirements and BMPs contained in existing regulations, including the NPDES Construction General Permit and LAMC. Furthermore, BMPs for post-construction erosion and sediment control would remain in effect, which would improve future erosion conditions. Compliance with the regulations discussed above would reduce the risk of soil erosion from construction activities such that there would be minimal change in risk compared to current conditions with existing development and impacts would be less than significant.

**LESS THAN SIGNIFICANT IMPACT**

- c. *Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?*

Impacts related to landslides and liquefaction are addressed under impact discussions *a.3.* and *a.4.*; therefore, this discussion focuses on impacts related to unstable soils as a result of lateral spreading, subsidence or collapse. Lateral spreading occurs as a result of liquefaction; accordingly, liquefaction-prone areas would also be susceptible to lateral spreading. Subsidence occurs at great depths below the surface when subsurface pressure is reduced by the withdrawal of fluids (e.g. groundwater, natural gas, or oil) resulting in sinking of the ground. The City of Los Angeles may be susceptible to subsidence from groundwater withdrawal as a result of drought conditions and declining groundwater levels.

The Housing Element Update would prioritize development of housing on infill sites in dense urban areas which may contain underlying unstable soils. Because project development would primarily involve infill development, development under the proposed project would not affect existing conditions related to unstable soils, unless improperly constructed. Nonetheless, all future project development would be required to comply with the CBC's minimum standards for structural design and site development, including those described in RCM-GEO-1 (Seismic). The CBC provides standards for excavation, grading, and earthwork construction; fills and embankments; expansive soils; foundation investigations; and liquefaction potential and soils strength loss. Therefore, CBC-required incorporation of soil treatment programs (replacement, grouting, compaction, drainage control, etc.) in the excavation and construction plans can achieve an acceptable degree of soil stability to address site-specific soil conditions. In addition, future projects would be required to comply with the regulations described in RCM-GEO-2 through RCM-GEO-6, which provide safety measures to address geologic hazards, as applicable. Adherence to these requirements would achieve accepted safety standards relative to unstable geologic units or soils. In addition, although project development would potentially be subject to these hazards, it would not increase the potential for lateral spreading, subsidence, or collapse. Therefore, impacts would be less than significant.

#### **LESS THAN SIGNIFICANT IMPACT**

- d. *Would the project be located on expansive soil, as defined in Table 1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?*

Soils that volumetrically increase (swell) or expand when exposed to water and contract when dry (shrink) are considered expansive soils. A soil's potential to shrink and swell depends on the amount and types of clay in the soil. Highly expansive soils can cause structural damage to foundations and roads without proper structural engineering and are generally less suitable or desirable for development than non-expansive soils because of the necessity for detailed geologic investigations and costlier grading applications.

The Housing Element Update would prioritize development of housing on infill sites in urban areas that may contain underlying expansive soils. Because project development would

primarily involve infill development, development under the proposed project would not substantially increase the potential exposure to or extent of expansive soils within the City. Furthermore, future project development be subject to LAMC regulations that require the testing of underlying soils for each individual development site for the presence of expansive soils and their remediation as necessary to reduce potential damage risk. The City of Los Angeles Building Code incorporates the CBC requirements for slab-on-ground building foundations located on expansive soils (CBC 2016). The CBC, which is based on the UBC, has been modified for California conditions with numerous more detailed and/or more stringent regulations. If expansive soils are detected based on a preliminary soil report, the CBC requires the preparation of a soil investigation prior to construction and incorporation of appropriate corrective actions to prevent structural damage, to be determined on a project-by-project basis. Individual development projects would be required to comply with regulations described in RCM-GEO-1 and RCM-GEO-6, which contain provisions for developments located on expansive soils. Therefore, there would be minimal change in the exposure of people or structures to risks associated with expansive soils and impacts would be less than significant.

#### LESS THAN SIGNIFICANT IMPACT

- e. *Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?*

The Los Angeles Bureau of Sanitation (LASAN) operates and maintains the City's wastewater infrastructure. The City's wastewater collection system serves over four million residential and business customers in a 600-square-mile service area that includes Los Angeles and 29 contracting cities and agencies. Over 6,700 miles of public sewers connect to the City's four wastewater treatment and water reclamation plants, which have a combined capacity to treat an average of 580 million gallons per day (mgd) of wastewater (LASAN 2020a and 2020b).

The Housing Element Update would emphasize the development of additional housing units in urban infill sites which would be served by existing LASAN infrastructure. Project development would not use septic systems. Therefore, there would be no impact related to the use of septic tanks or alternative wastewater disposal systems.

#### NO IMPACT

- f. *Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*

The Housing Element Update would prioritize the development of new housing on infill sites in areas with existing public transit infrastructure and areas of the City that have previously been developed and disturbed. Nonetheless, there is the potential for paleontological resources to exist below the ground surface throughout the City. Paleontological resources have been found in many parts of the City, mostly around hillsides but also in the center parts of the City, including most famously around the La Brea Tar Pits within and surrounding

Hancock Park. Such resources could be disturbed by grading and excavation activities associated with new housing development. Therefore, project development has the potential to impact paleontological resources and this issue will be discussed further in an EIR.

**POTENTIALLY SIGNIFICANT IMPACT**

## 8 Greenhouse Gas Emissions

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	■	□	□	□
g. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	■	□	□	□

### Safety Element Update

In order to ensure compliance with state law, the City anticipates amending the Safety Element to formally integrate related long-range planning efforts. Furthermore, updates to the Safety Element would involve updates to safety policies and requirements to provide consistency with the Housing Element Update, including those related to emergency response as part of the Local Hazard Mitigation Plan, which would provide guidance to minimize impacts associated with hazardous and unsafe conditions. Therefore, the Safety Element Update would not result in any adverse impacts related to GHG emissions.

### Housing Element Update

The City has extensive regulatory requirements for development projects that are intended to reduce GHG emissions. These regulations summarized in the following RCMs would apply to applicable project development:

- **RCM-GHG-1 (Green Building Code):** In accordance with the City of Los Angeles Green Building Code (Chapter IX, Article 9, of the LAMC), the development is required to comply with applicable mandatory provisions of the latest Los Angeles Green Code and as it may be subsequently amended or modified. The Los Angeles Green Building Code contains mandatory measures for residential and non-residential uses, particularly those related to energy efficiency (i.e., renewable energy, indoor and outdoor water use, and water reuse systems).
- **RCM-GHG-2 (Title 24):** Developments are required to comply with the applicable mandatory requirements of the latest Building Energy Efficiency Standards (Title 24, Parts 6 and 11), including use of high-efficiency lighting and EnergyStar appliances.

- **RCM-GHG-3 (CALGreen):** Developments are required to comply with the applicable mandatory requirements of the latest California Green Building Standards Code (CALGreen; Title 24, Part 11), including water-saving requirements such as efficient plumbing fixtures and irrigation systems.
  - **RCM-GHG-4 (Construction Waste):** Construction waste is required to be reduced by at least 50 percent. AB 939 requires diversion of 50 percent of solid waste to landfills through source reduction, recycling, and composting. The California Solid Waste Reuse and Recycling Access Act of 1991 requires adequate storage areas for collection and storage of recyclable waste materials.
  - **RCM-GHG-5 (Renewable Portfolio Standard):** Project development would use energy from SCE or the LADWP, which are required to diversify their portfolios of energy sources to increase the use of renewable energy. Per SB 100, the statewide Renewable Portfolio Standard (RPS) Program requires electricity providers to increase procurement from eligible renewable energy sources to 60 percent by 2030.
- a. *Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?*
- b. *Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

Assembly Bill 32, the Global Warming Solutions Act of 2006 (AB 32), requires the state to reduce GHG emissions to 1990 levels by 2020. The CARB adopted the Scoping Plan to identify state regulations and programs that would be adopted by State agencies to achieve the 1990 target of AB 32. In addition, Senate Bill 375, the Sustainable Communities and Climate Protection Act of 2008 (SB 375), was adopted by the legislature to reduce per capita VMT and associated GHG emissions from passenger vehicles. The City seeks to reduce GHG emissions throughout the community by maintaining consistency with the most directly applicable adopted regulatory plans, including, but not limited to, the 2017 Scoping Plan, the 2020 RTP/SCS (also known as *Connect SoCal*).

Project development would generate GHG emissions during construction through the use of petroleum-fueled construction equipment and worker vehicle trips to and from construction sites. Operation of developments generate GHG emissions through the use of electricity and natural gas, vehicle trips of occupants, waste generation, water use, and wastewater generation. Although project development would be required to implement RCM-GHG-1 through RCM-GHG-5, GHG emissions generated under the proposed project could potentially have a significant impact on the environment. As such, potential GHG emissions generated by project development, and the consistency of project development with applicable plans, policies, or regulations aimed at reducing such GHG emissions, will be further analyzed in an EIR.

#### **POTENTIALLY SIGNIFICANT IMPACT**

# 9 Hazards and Hazardous Materials

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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Would the project:

- |   |                                     |                          |                                     |                          |
|---|-------------------------------------|--------------------------|-------------------------------------|--------------------------|
| a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?   | <input type="checkbox"/>            | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> |
| c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> |
| d. Be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> |
| e. For a project located in an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area? | <input type="checkbox"/>            | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### Safety Element Update

In order to ensure compliance with state law, the City anticipates amending the Safety Element to formally integrate related long-range planning efforts. Furthermore, updates to the Safety Element would involve updates to safety policies and requirements to provide consistency with the Housing Element Update, including those related to emergency response as part of the Local Hazard Mitigation Plan, which would provide guidance to minimize impacts associated with hazardous and unsafe conditions. Therefore, the Safety Element Update would not result in any adverse impacts related to hazards and other risks, rather the Safety Element Update is intended to improve policies and regulations associated with hazardous materials or other risks (e.g., emergency response or evacuation plans, and wildland fires).

### Housing Element Update

The City and State law have extensive and comprehensive regulatory requirements for development projects to reduce or eliminate risks related to hazardous materials. These measures summarized in the following RCMs would apply to project development:

- **RCM-HAZ-1 (Asbestos):** Pursuant to California Health and Safety Code Section 19827.5, a demolition permit is not to be issued by any city, county, city and county, or State or local agency which is authorized to issue demolition permits as to any building or other structure except upon the receipt from the permit applicant of evidence of asbestos notification to the Environmental Protection Agency or SCAQMD or if the applicant declares that notification is not applicable to the demolition project. If ACMs are found to be present, ACMs shall be abated in compliance with SCAQMD Rule 1403, as well as all other applicable State and Federal rules and regulations.
- **RCM-HAZ-2 (Lead-Based Paint):** Should lead-based paint materials be identified in any buildings proposed for demolition or alteration, standard handling and disposal practices shall be conducted in compliance with California and Federal Occupational Safety and



Health Administration (OSHA) and SCAQMD requirements. Only lead-based paint trained and certified abatement personnel are allowed to perform abatement activities onsite. All lead-based paint removed from onsite structures are to be hauled and disposed of by a transportation company certified to handle hazardous or regulated waste.

- **RCM-HAZ-3 (Polychlorinated Biphenyl):** Should polychlorinated biphenyls (PCBs) be identified in any buildings proposed for demolition or alteration, a qualified abatement contractor needs to conduct a survey of the project site to identify and assist with compliance with applicable state and federal rules and regulation governing PCB removal and disposal.
- **RCM-HAZ-4: Explosion/Release (Methane Zone):** For a project site within a methane zone, prior to the issuance of a building permit, the site is required to be independently analyzed by a qualified engineer, as defined in Ordinance No. 175,790 and Section 91.7102 of the LAMC, hired by the project applicant. The engineer is required to investigate and design a methane mitigation system in compliance with the LADBS Methane Mitigation Standards for the appropriate Site Design Level which will prevent or retard potential methane gas seepage into the building. The project applicant is required to implement the engineer's design recommendations subject to Los Angeles Department of Building and Safety (LADBS) and Los Angeles Fire Department (LAFD) plan review and approval.
- **RCM-HAZ-5 (Soil Gases):** During subsurface excavation activities, including borings, trenching and grading, OSHA worker safety measures are to be implemented as required to preclude any exposure of workers to unsafe levels of soil-gases, including, but not limited to, methane.
- **RCM-HAZ-6 (Removal of Underground Storage Tanks):** Underground Storage Tanks (USTs) are required to be decommissioned or removed as determined by the LAFD UST Division. If any contamination is found, further remediation measures would be developed with the assistance of the LAFD and other appropriate State agencies. Prior to issuance of a use of land or building permit, a letter certifying that remediation is complete from the appropriate agency (Department of Toxic Substance Control or the Regional Water Quality Control Board) is required for submission to the decision maker.
- **RCM-HAZ-7 (Hazardous and Contaminated Materials):** If hazardous or contaminated materials are encountered during construction or geotechnical exploration, the project applicant needs to contact the LAFD. The LAFD may provide oversight of remediation or refer the case to the appropriate County, State, or Federal agency depending on site specific conditions to ensure that all applicable regulatory requirements are adhered to.

- a. *Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*

The Housing Element Update would prioritize the development of new housing on urban infill sites with access to jobs and public transit infrastructure. Construction associated with project development would involve the use of potentially hazardous materials, such as vehicle fuels and fluids, that could be released should a leak or spill occur. However, contractors would be required to implement standard construction BMPs for the use and

handling of such materials to avoid or reduce the potential for such conditions to occur. Any use of potentially hazardous materials during construction of future development in accordance with the proposed project would be required to comply with all local, State, and federal regulations regarding the handling of potentially hazardous materials. Likewise, the transport, use, and storage of hazardous materials during future construction would be required to comply with all applicable State and federal laws, such as the Hazardous Materials Transportation Act, Resource Conservation and Recovery Act, the California Hazardous Material Management Act, and California Code of Regulations Title 22.

Housing is not a land use typically associated with the use, transportation, storage, or generation of significant quantities of hazardous materials. Operation of project development would likely involve an incremental increase in the use of common household hazardous materials, such as cleaning and degreasing solvents, fertilizers, pesticides, and other materials used in regular property and landscaping maintenance. Use of these materials would be subject to compliance with existing regulations, standards, and guidelines established by the federal, State, and local agencies related to storage, use, and disposal of hazardous materials. Therefore, upon compliance with all applicable local, State, and federal laws and regulations relating to environmental protection and the management of hazardous materials, potential impacts associated with the routine transport, use, or disposal of hazardous materials during construction and operation of project development would be less than significant.

#### **LESS THAN SIGNIFICANT IMPACT**

- b. Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?*

As discussed under impact discussion *a.* of this section, the transport, use, and storage of hazardous materials during the construction of future housing under the proposed project would be conducted in accordance with all applicable state and federal laws, such as the Hazardous Materials Transportation Act, Resource Conservation and Recovery Act, the California Hazardous Material Management Act, and California Code of Regulations Title 22. In addition, the potential for future construction of project development to involve the demolition or alteration of structures that may contain asbestos and/or lead-based paint (LBP), would be reduced through compliance with existing regulations, including SCAQMD Rule 1403 (Asbestos Emissions from Demolition/Renovation Activities) which requires the owner or operator of any demolition or renovation activity to complete a facility survey for the presence of asbestos prior to any demolition or renovation activity and federal and state regulations related to lead and PCBs (see e.g., Title 40 of the CFR and Title 22 of the CCR). The Housing Element Update would emphasize development on infill sites within urban areas, where there is the potential for future development to occur on project sites where hazardous materials were once used or stored and have the potential to contain contaminated soils, the disturbance of which could pose hazards to receptors at adjacent land uses. Future construction projects would be required to comply with the regulations in RCMs HAZ-1 through HAZ-7 to minimize the potential impacts of existing hazardous materials on project

sites. Nonetheless, impacts related to the release of hazardous materials from soil contamination would be potentially significant and will be studied further in an EIR.

**POTENTIALLY SIGNIFICANT IMPACT**

- c. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?*

The Los Angeles Unified School District operates 705 public and charter schools in the City (City of Los Angeles 2016). Private schools, preschools, and other charter academies are also spread throughout in the City. As discussed under impact discussion *b.* of this section, project development may involve construction activities on sites that may contain contaminated soils, which could pose hazards to nearby schools in the case of an accidental release. Future construction projects would be required to comply with the regulations described in RCM-HAZ-1 through RCM-HAZ-7 to minimize the potential impacts of existing hazardous materials on project sites. However, the proposed project could potentially impact schools and this issue will be addressed in an EIR.

**POTENTIALLY SIGNIFICANT IMPACT**

- d. Would the project be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?*

The Housing Element Update, and Rezoning Program, may involve the alteration, intensification, and redistribution of land uses. Project development could occur on hazardous materials sites. As required by RCM-HAZ-6 (Removal of Underground Storage Tanks) and RCM-HAZ-7 (Hazardous and Contaminated Sites), sites that are identified as being contaminated by hazardous substances or containing underground storage tanks and/or generators of hazardous waste are required to undergo remediation and cleanup pursuant to regulations under the California Department of Toxic Substances Control (DTSC) and the Los Angeles Regional Water Quality Control Board (LARWQCB) before construction activities can begin. Furthermore, if any future development project were to exceed regulatory action contamination levels, the project applicant would be required to undertake remediation procedures under the supervision of the County Environmental Health Division, DTSC, or LARWQCB, depending on the nature of the contaminants. Nonetheless, construction of Project development could lead to a significant hazard to the public or environment by exposing future residents to potential contamination if not properly identified. Therefore, this impact will be further discussed in an EIR.

**POTENTIALLY SIGNIFICANT IMPACT**

- e. *For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?*

There are several airports in the City of Los Angeles or its vicinity, including the Los Angeles International Airport, Santa Monica Municipal Airport, Van Nuys Airport, Hollywood Burbank Airport, Long Beach Airport, San Gabriel Valley Airport, and Hawthorne Municipal Airport. To prevent the creation of airport hazard zones, restrictions are placed on development in the immediate vicinity of airport runways where take-off and final approach maneuvers occur. The Los Angeles County Airport Land Use Commission (ALUC) is responsible for implementing airport land use plans that promote compatibility between each airport in the county and the surrounding land uses to ensure that hazardous conditions are not created (ALUC 2020). The Housing Element Update would not contain policies that would conflict with the airport land use plans established by ALUC, nor would it emphasize building housing in the immediate vicinity of airports. If project development were proposed within two miles of an airport or within an airport influence area, it would be required to comply with applicable regulations and standards. This includes, but is not limited to, the 2019 CBC Title 24, Part 2, Section 1206.4 (Allowable Interior Noise Levels) of the California Code of Regulations, interior noise levels attributable to exterior sources shall not exceed 45 CNEL in any habitable room. While residents of project developments may be subject to occasional overhead flight noise, the proposed project would not lead to excessive noise or safety hazards as it relates to airports. This impact would be less than significant.

#### **LESS THAN SIGNIFICANT IMPACT**

- f. *Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

The City of Los Angeles Emergency Management Department (EMD) is comprised of four divisions and two units: the administrative services division, communications division, community emergency management division, operations division, planning unit, and training exercise unit. EMD partners with City departments, municipalities, and local organizations to provide resources and information to help residents prepare for, respond to, and recover from disasters. Within the EMD, the Emergency Operations Organization (EOO) is the operational department responsible for the City's emergency preparation, response, and recovery operations, while the Emergency Operation Center (EOC) is responsible for coordination of these efforts (EMD 2020). The City's General Plan Safety Element, Exhibit H, currently identifies the major disaster routes within the City (City of Los Angeles 1996). In addition, the County of Los Angeles Department of Public Works has prepared maps of freeway and local disaster routes (County of Los Angeles 2008). These routes typically parallel major north-south and east-west corridors and include freeways such as Interstate 405, U.S. 101, Interstate 710, Interstate 10 (County of Los Angeles 2008).

Construction activities can potentially interfere with adopted emergency response or evacuation plans as a result of temporary construction activities within rights-of-way, due to

temporary construction barricades or other obstructions that could impede emergency access. However, project development construction will not result in interference with adopted emergency response or evacuation plans because temporary construction barricades or other obstructions that could impede emergency access would be subject to the City's permitting process, which requires a traffic control plan subject to City review and approval. Development and implementation of these plans for all construction activity would minimize potential impacts associated with the impairment or physical interference with adopted emergency response or evacuation procedures.

In addition, increased housing development density from the Project development could result in additional traffic on area roadways. However, the goals, objectives, and policies of the Safety Element of the Los Angeles City General Plan and the Los Angeles County Operational Area Emergency Response Plan (ERP) provide guidance during unique situations requiring an unusual or extraordinary emergency response. Implementation of the ERP would involve coordination with all the facilities and personnel of County government, along with the jurisdictional resources of the cities and special districts within the County, into an efficient organization capable of responding to any emergency using a Standard Emergency Management System, mutual aid and other appropriate response procedures.

The City's EOO implements the goals and policies of the General Plan Safety Element. The Safety Element outlines the scope of the EOO's on-going efforts to use experiences and new information to improve the City's hazard program. The City's Emergency Operations Plan and individual agency ERPs set forth procedures for City personnel to follow in the event of an emergency situation stemming from natural disasters, technological incidents, and nuclear defense operations (City of Los Angeles 2018b). Furthermore, updates to the Safety Element would involve updates to safety policies and requirements, including those related to emergency response, including to incorporate the City's Local Hazard Mitigation Plan, which would provide guidance to minimize impacts associated with hazardous conditions. In addition, the City of Los Angeles Department of Transportation and LAFD would be responsible for ensuring that future development does not impair or physically interfere with an adopted emergency response or evacuation plan. As part of standard development procedures, plans would be submitted for review and approval to ensure that all new development has adequate emergency access and escape routes in compliance with existing City regulations. As discussed in Section 16, *Transportation*, potential impacts related to the effective performance of the circulation system will be discussed in the EIR, as well as other transportation related issues, such as traffic hazards, incompatible uses, and emergency access. Furthermore, the Housing Element Update would not introduce any features or policies that would preclude implementation of or alter these policies or procedures. Therefore, impacts related to emergency response plans and emergency evacuation plans would be less than significant.

#### **LESS THAN SIGNIFICANT IMPACT**

- g. *Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?*

As further discussed in Section 20, *Wildfire*, portions of the City are subject to wildland fire risk, primarily in areas where single-family residential development abuts the undeveloped hillsides and natural areas in the northern portion of the City and around the Santa Monica Mountains (City of Los Angeles 1996). The Project development would generally be located on urban infill sites within areas well served by high quality public transit. As shown in Figure 2, these areas tend to be concentrated in the more densely urbanized portions of the City, and not near the wildland urban interfaces that are subject to high fire risk. Therefore, the proposed project would generally direct future growth away from low-density neighborhoods, such as those near the urban-wildland interface where the risk of wildland fires is heightened.

To the extent any project development is located in Very High Fire Hazard Severity Zones as mapped by the California Department of Forestry and Fire Protection (CalFIRE) and Fire Brush Clearance Zones, regulations require development to minimize fire risks during the high fire season through vegetation clearance, maintenance of landscape vegetation to minimize fuel supply that would spread the intensity of a fire, compliance with provisions for emergency vehicle access, use of approved building materials and design, and compliance with LAFD hazardous vegetation clearance requirements pursuant to the Los Angeles Fire Code (2017). Any new housing developed in such areas would be subject to these requirements. In addition, project development would be required to be constructed according to the UBC requirements for fire-protection and would be subject to review and approval by the LAFD. Therefore, the proposed project would not be anticipated to pose a substantial risk to people or structures due to wildland fires. Impacts would be less than significant.

#### **LESS THAN SIGNIFICANT IMPACT**

# 10 Hydrology and Water Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
(i) Result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(iv) Impede or redirect flood flows?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
d. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### Safety Element Update

In order to ensure compliance with state law, the City anticipates amending the Safety Element to formally integrate related long-range planning efforts. Furthermore, updates to the Safety Element would involve updates to safety policies and requirements to provide consistency with the Housing Element Update, including those related to emergency response as part of the Local Hazard Mitigation Plan, which would provide guidance to minimize impacts associated with hazardous and unsafe conditions. Therefore, the Safety Element Update is unlikely to result in any adverse impact related to hydrology and water quality. However, for the purposes of providing more robust analysis and disclosure, this topic will be further discussed in the EIR as it relates to flood flows.

### Housing Element Update

The City, State and federal law have extensive regulatory requirements to reduce or eliminate impacts to water quality during construction of projects. The following summarizes RCMs related to hydrology and water quality that project development would comply with:

- **RCM-WQ-1 (National Pollutant Discharge Elimination System General Permit):** Prior to issuance of a grading permit, the applicant is required to obtain coverage under the State Water Resources Control Board National Pollutant Discharge Elimination System General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2009-0009-DWQ, National Pollutant Discharge Elimination System No. CAS000002) (Construction General Permit) for Phase 1 of the proposed Project. The Applicant is required to provide the Waste Discharge Identification Number to the City of Los Angeles to demonstrate proof of coverage under the Construction General Permit. A Storm Water Pollution Prevention Plan needs to be prepared and implemented for the proposed project in compliance with the requirements of the Construction General Permit. The Storm Water Pollution Prevention Plan needs to identify construction BMPs to be implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in stormwater runoff as a result of construction activities.
- **RCM-WQ-2 (Dewatering):** If required, any dewatering activities during construction are required to comply with the requirements of the Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters



in Coastal Watersheds of Los Angeles and Ventura Counties (Order No. R4-2008-0032, National Pollutant Discharge Elimination System No. CAG994004) or subsequent permit. This will include submission of a Notice of Intent for coverage under the permit to the Los Angeles Regional Water Quality Control Board at least 45 days prior to the start of dewatering and compliance with all applicable provisions in the permit, including water sampling, analysis, and reporting of dewatering-related discharges.

- **RCM-WQ-3 (LID Plan):** Prior to issuance of grading permits, the Applicant is required to submit a LID Plan and/or Standard Urban Stormwater Mitigation Plan to the City of Los Angeles Bureau of Sanitation Watershed Protection Division for review and approval. The Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan shall be prepared consistent with the requirements of the Development Best Management Practices Handbook.
- **RCM-WQ-4 (Best Management Practices):** BMPs need to be designed to retain or treat the runoff from a storm event producing 0.75 inch of rainfall in a 24-hour period, in accordance with the Development Best Management Practices Handbook Part B Planning Activities. A signed certificate from a licensed civil engineer or licensed architect confirming that the proposed BMPs are required to meet this numerical threshold standard.
- **RCM-WQ-5 (Alteration of a State or Federal Watercourse):** Development is required to comply with the applicable sections of the federal Clean Water Act (CWA) and California's Porter Cologne Water Quality Control Act (Porter Cologne). Prior to the issuance of any grading, use of land, or building permit which may affect an existing watercourse, the applicant is required to consult with the following agencies and obtain all necessary permits and/or authorizations, to the satisfaction of the Department of Building and Safety. Compliance is to be determined through written communication from each jurisdictional agency, a copy of which shall be submitted to the Environmental Review case file for reference:
  - *United States Army Corps of Engineers.* The applicant is required to obtain a Jurisdictional Determination (preliminary or approved), or a letter otherwise indicating that no permit is required. Contact: Aaron O. Allen, Chief - North Coast Branch, Regulatory Division, 805-585-2148.
  - *State Water Resources Control Board.* The applicant is required to consult with the 401 Certification and Wetlands Unit and obtain all necessary permits and/or authorizations, or a letter otherwise indicating that no permit is required. Contact: 401 Certification and Wetlands Unit, Los Angeles Region, 320 W 4th Street, #200, Los Angeles, CA 90013, (213) 576-6759.
  - *California Department of Fish and Wildlife.* The applicant is required to consult with the Lake and Streambed Alteration (LSA) Program and obtain a Streambed Alteration Agreement, or a letter otherwise indicating that no permit is required. Contact: LSA Program, 3883 Ruffin Road, San Diego, CA 92123, (858) 636-3160.

- **RCM-WQ-6 (Flooding/Tidal Waves):** Development is required to comply with the requirements of the Flood Hazard Management Specific Plan, Ordinance No. 172081 effective July 3, 1998.
- a. *Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?*

The Housing Element Update would encourage new residential development on infill sites within urban areas of the City. Construction of project development could potentially impact surface or ground water quality due to erosion resulting from exposed soils and the generation of water pollutants, including trash, construction materials, and equipment fluids. Section D of LAMC Article 4.4, *Stormwater and Urban Runoff Pollution Control*, requires owners or developers to implement stormwater pollution control requirements for construction activities depicted in the project plans, which are subject to approval by the Department of Building and Safety; the Director of the Department may require additional and/or alternative site-specific BMPs or conditions, if needed. Likewise, regulations described in RCM-WQ-4 (Best Management Practices) require implementation of BMPs. In addition, regulations described in RCM-WQ-1 (National Pollutant Discharge Elimination System General Permit) require construction activities on a site of more than one acre, or on a site which is part of a larger development plan that would total more than one acre, would be subject to the NPDES Statewide General Construction Activity Stormwater Permit. Operators of a construction site would be responsible for preparing and implementing a SWPPP that outlines project specific BMPs to control erosion, sediment release, and otherwise reduce the potential for discharge of pollutants in stormwater. Typical BMPs include covering stockpiled soils, installation of silt fences and erosion control blankets, and proper handling and disposal of wastes. Compliance with these regulatory requirements would minimize impacts to water quality during the construction of future project development.

In addition, in accordance with RCM-WQ-3 (LID Plan), all project development would be required to comply with the LID Ordinance and Stormwater and Urban Runoff Pollution Control Ordinance, which require the inclusion of BMPs in a project's design to prevent, control and reduce stormwater pollutants. Typical BMPs include source prevention and treatment control, such as catch basin filters and infiltration/detention basins, as well as minimizing impervious paving. The City's Stormwater and Urban Runoff Pollution Control Ordinance requires future development to comply with the SUSMP requirements, if applicable, integrate LID practices and standards for stormwater pollution mitigation, and maximize open, green, and pervious space on all development consistent with the City's landscape ordinance and other related requirements. BMP requirements are enforced through the City's plan approval and permit process and plans for all new development projects are subject to City inspection. Compliance with the LAMC would ensure that Project development does not violate any water quality standards or discharge requirements or otherwise substantially degrade water quality. All future project-related activities would also be subject to Sections A and B of the LAMC Article 4.4, which generally prohibits discharge of specific materials into the storm drain system or receiving waters, such as the Los Angeles River.

Compliance with federal, State, and local regulations would reduce impacts resulting from project development to a less than significant level. Furthermore, the Housing Element Update would not introduce any features that would preclude implementation of or alter these policies and procedures in any way. Therefore, the proposed project would not violate any water quality standards or waste discharge requirements, and impacts would be less than significant.

#### LESS THAN SIGNIFICANT IMPACT

- b. *Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*

The LADWP provides water service in the City. In recent years, groundwater has comprised approximately 12 percent of LADWP's total water supply (LADWP 2016). The City of Los Angeles lies above several groundwater basins, including the Sylmar, Verdugo, Tujunga, Eagle Rock, San Fernando, Coastal Plain of Los Angeles, West Coast, Santa Monica, and Central Groundwater Basins. The most important of these basins are the San Fernando and Central Basins (City of Los Angeles 1995). The LADWP relies on several of these local groundwater sources, including the Coastal Plain of Los Angeles Groundwater Basin, Central Basin, San Fernando Basin, and Sylmar Basin. The City owns water rights in the San Fernando, Sylmar, Eagle Rock, Central, and West Coast Basins (LADWP 2016). All these basins are controlled by court adjudications, which prevents depletion of groundwater supplies and limits the amount of groundwater resources that the City may extract; the City's combined water rights in these basins are approximately 109,809 acre-feet per year (AFY) (LADWP 2016).

While project development could increase demand for LADWP water by increasing residential density, this demand would need to be met in a number of ways other than increasing groundwater withdrawal, such as increasing the amount of water purchased from the Metropolitan Water District (MWD) of Southern California, implementing water conservation measures, increasing use of recycled water, and/or implementing groundwater recharge projects. See Section 19, *Utilities and Service Systems*, for a discussion of the adequacy of LADWP water supplies for meeting future demand in the City.

Future development would not substantially increase the amount of impervious surface in the City because the Housing Element Update would prioritize development on infill areas that are already urbanized and largely covered with impervious surfaces; therefore, the proposed project would not interfere substantially with groundwater recharge. Implementation of the Housing Element may provide some benefits to groundwater recharge by replacing older development with new development subject to open space, landscaping, and stormwater BMP requirements that would increase pervious surfaces associated with new development.

Construction activities associated with project development, such as excavation for subterranean parking lots and foundation-laying for tall buildings, could potentially extend

into the underlying groundwater table. Construction activities overlying areas with shallower groundwater depth could expose groundwater resources to contamination. However, the risk of groundwater contamination during construction is minimal and would most likely occur due to spills or leaks from equipment or materials used in construction. Furthermore, the regulations described in RCM-WQ-2 (Dewatering) would require that construction of any future projects involving dewatering activities to comply with the applicable dewatering requirements to protect groundwater supplies and quality. Likewise, LAMC Article 4.4 and RCM-WQ-4 (Best Management Practices) require that any future projects include construction BMPs to prevent contamination of stormwater and runoff in its project plans. These BMPs are subject to City review and are required to be implemented during construction. Developers of individual project sites one acre or more in size are also required to prepare a SWPPP, which includes BMPs to prevent contamination of stormwater and runoff during construction. Typical construction BMPs to prevent stormwater contamination would also prevent contamination of groundwater resources, as exemplified by the following BMPs:

- Construction equipment and vehicles shall be properly maintained.
- All materials shall be properly stored and transported.
- Fuels will be stored in secure areas.

With implementation of appropriate construction BMPs, the impact of the proposed project on groundwater resources would be minimized and impacts to groundwater supplies and sustainable groundwater management would be less than significant.

#### **LESS THAN SIGNIFICANT IMPACT**

- c.(i) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site?*
- c.(ii) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?*
- c.(iii) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?*

The Housing Element Update would prioritize new housing development on infill sites in urbanized areas with access to quality public transit infrastructure. Under existing conditions, the infill sites prioritized for new housing development would be almost entirely paved and/or developed with structures. Therefore, project development would not be anticipated to substantially alter drainage patterns. Consequently, the proposed project would not alter

the drainage pattern of the City to an extent that would result in substantial erosion, siltation, or flooding on- or off-site.

Although implementation of the Housing Element Update would increase the residential density in priority areas of the City, project development is not expected to result in substantial additional sources of polluted runoff since residential uses are not associated with high levels of stormwater pollution. Examples of contaminants associated with these uses include garbage, leaked vehicle fuels, and household products. In addition, any new development or re-development projects would comply with the regulations described in RCM-WQ-1 (National Pollutant Discharge Elimination System General Permit), RCM-WQ-3 (LID Plan), and RCM-WQ-4 (Best Management Practices) to incorporate design BMPs to capture and treat runoff, in accordance with regulations deriving from the Los Angeles County NPDES MS4 permit (i.e., SUSMP, LID Ordinance, LID Handbook). As discussed under impact discussion *a.* of this section, future construction activities would be required to include BMPs to prevent stormwater contamination and reduce runoff, pursuant to LAMC Article 4.4, and potentially the NPDES General Construction Permit depending on the size of future development projects. Therefore, future development would not introduce substantial additional sources of polluted runoff.

Because implementation of the Housing Element Update would not substantially alter the existing drainage pattern and development and construction of future projects would be required to implement stormwater BMPs, project development would not generate a substantial increase in runoff that would result in substantial erosion, siltation, flooding on- or off-site, or increased polluted runoff. Impacts related to drainage and runoff would be less than significant.

#### **LESS THAN SIGNIFICANT IMPACT**

*c.(iv) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows?*

Flood control and storm drainage systems in the City include the following:

- Debris basins at the mouths of canyons to slow the flow of water and trap boulders, rocks and debris and to prevent clogging of the flow channels
- Flood control basins (dams) at the upstream portions of the rivers to contain water and regulate downstream flow
- Containment of over 400 miles of river and tributary systems within mostly open concrete flood control channels
- Streets, gutters and catch basins to collect and route surface flows to storm drains which carry urban run-off to the flood control channels and ocean
- Spreading grounds in the San Fernando Valley to impound storm water and allow it to percolate into the ground
- Associated bridges, reservoirs and water storage facilities

The purpose of the flood control system is to quickly carry storm waters to the Santa Monica and San Pedro bays to prevent flooding (City of Los Angeles 1996).

The City contains areas subject to 100-year and 500-year floods, which are mapped by FEMA. In general, areas subject to flood risk include the Los Angeles River and other river and stream channels and embankments, areas surrounding reservoirs such as the Hollywood Reservoir and Hansen Dam, and coastal areas (City of Los Angeles 2018c). However, areas subject to 500-year floods may also include areas of the City that are not near reservoirs or waterways, such as Central and South LA. As discussed under impact discussions *c.(i)*, *c.(ii)*, and *c.(iii)* of this section., the project development would be primarily located on infill sites in urban areas which are almost entirely paved and/or developed with structures. However, the project could also result in development on unpaved hillside areas. Therefore, while most project development would not be anticipated to substantially alter drainage patterns, the project could result in hillside development with the potential to redirect or impede flood flows.

All project development would be required to comply with the regulations described in RCM-WQ-5 (Alteration of a State or Federal Watercourse) to minimize the potential for impacts to jurisdictional watercourses. In addition, as specified in RCM-WQ-6 (Flooding/Tidal Waves), all project development that would occur in a flood risk zone would be subject to restrictions and requirements established by the City's permitting process and would be required to incorporate appropriate City and FEMA flood plain management measures in the design of new buildings, as described in the Floodplain Management Plan and enforced by the Department of Building and Safety. Nonetheless, for the purposes of providing more robust analysis and disclosure, impacts to flood flows associated with the Housing Element Update will be further discussed in the EIR. In addition, as discussed under *Safety Element Update* of this section, the potential impacts related to flood flows under the Safety Element Update will also be further analyzed in the EIR.

#### POTENTIALLY SIGNIFICANT IMPACT

*d. In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?*

As discussed under impact discussion *c(iv)* of this section, portions of the City lie in flood hazard zones, particularly surrounding rivers, streams, and reservoirs. In addition, areas of the City along the coast of the Pacific Ocean could be impacted by flooding in the event of a tsunami. There is also the potential for dam failure or seiches produced on inland bodies of water to cause flooding in parts of the City. Exhibits F and G of the General Plan Safety Element illustrate areas in the City that are subject to inundation risks (City of Los Angeles 1996).<sup>16</sup>

There are three general areas subject to tsunami risk are the Port of Los Angeles area, coastal areas south of the City of Santa Monica and north of the South Bay Cities (Venice Beach, Marina Del Rey, and Playa del Rey), and the coastal stretch of the City north of Santa Monica

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<sup>16</sup> Note: 100-year and 500-year flood areas shown on Exhibit F of the Safety Element may be slightly different due to updates to FEMA flood maps in the years since 1996.

and south of the City of Malibu (Pacific Palisades area) (DOC 2009). Tsunami flooding risk is limited to a relatively narrow stretch of the land closest to the coast, and the majority of the City lies outside of the Tsunami Inundation Zone.

Project development could potentially involve denser residential development in areas subject to tsunami risk. However, in the event of a tsunami, the City has established response procedures as described in Chapter 12 of the City's Local Hazard Mitigation Plan to mitigate risks associated with tsunamis (City of Los Angeles 2017). In addition, new development located in tsunami hazard zones would not increase the potential for tsunami hazards.

According to the City's Local Hazard Mitigation Plan, there are 27 reservoirs and associated dams with the potential to impact the City should dam failure or seiche occur (City of Los Angeles 2017). The California Division of Safety of Dams oversees the design and construction of dams and conducts yearly inspections to ensure that the dams are performing and being maintained in a safe manner. Dams that could impact the City are regularly inspected and meet current safety regulations. Dams and reservoirs are monitored during storms and measures are instituted in the event of potential overflow. In addition, the City's Local Hazard Mitigation Plan provides a list of existing programs, proposed activities, and specific projects that may assist the City in reducing risks and injury from natural and human-made hazards, including dam failure, tsunami, and flooding. Thus, given that dams in the vicinity of the City are regularly inspected by the California Division of Safety of Dams and existing programs and activities are in place to reduce possible risks of dam failure and overtopping due to seiche, the failure of the dam during a catastrophic event, such as a severe earthquake, is considered unlikely.

The type of development expected to occur under the Housing Element Update is typical of urban environments. Project development would be concentrated on urban infill sites and would not substantially alter the overall development patterns in the City. The Housing Element Update would increase development capacity, thereby potentially increasing the number of people and structures exposed to potential flooding, including flooding as a result of a levee or dam failure; however, this condition already exists and the proposed project would not cause or accelerate existing flood hazard. Furthermore, while there is the potential for a tsunami, flooding, or dam failure to impact portions of the City, as discussed under Section 9, *Hazards and Hazardous Materials*, future housing developments under the proposed project would not involve the storage or use of significant quantities of hazardous materials. In addition, future projects would be developed in accordance with the regulations described in RCM-WQ-6 (Flooding/Tidal Waves) to ensure compliance with the requirements of the Flood Hazard Management Specific Plan. Therefore, risks related to the release of hazardous materials due to inundation are minimal and the Housing Element Update would have less than significant impacts.

#### **LESS THAN SIGNIFICANT IMPACT**

- e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*

Potential water quality and groundwater impacts associated with the Housing Element Update are discussed above under impact discussion *a.* and *b.* The Housing Element Update would not contain any policies that would conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Furthermore, future project would be required to comply with the existing regulations discussed under *Impacts a.* and *b.* of this section, including during construction and operation, and would not otherwise substantially degrade water quality. Impacts would be less than significant.

**LESS THAN SIGNIFICANT IMPACT**



# 11 Land Use and Planning

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Safety Element Update

In order to ensure compliance with state law, the City anticipates amending the Safety Element to formally integrate related long-range planning efforts. Furthermore, updates to the Safety Element would involve updates to safety policies and requirements to provide consistency with the Housing Element Update, including those related to emergency response as part of the Local Hazard Mitigation Plan, which would provide guidance to minimize impacts associated with hazardous and unsafe conditions. Therefore, the Safety Element Update would not result in any adverse impacts related to land use and planning.

## Housing Element Update

- a. *Would the project physically divide an established community?*

The Housing Element Update would prioritize the development of new housing on infill sites within areas with existing public transit infrastructure. Project development would occur in already urbanized areas of the City and would not involve the construction of new roads, railroads, or other features that may physically divide established communities in the City. Consequently, there would be no impact associated with the physical division of an established community.

**NO IMPACT**

- b. *Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?*

The Housing Element Update examines the City of Los Angeles' housing needs, as they exist today, and projected future housing needs. This update focuses on addressing the City's housing needs by providing goals, policies and programs associated with fair housing, the prevention of displacement, promoting housing stability, producing housing adequate to meet need, ensuring equitable distribution of housing, expanding access to opportunity, reducing GHG emissions through an improved jobs-housing balance, promoting climate resiliency and sustainability, and the prevention of homelessness. The proposed project includes actions the City is undertaking to achieve its housing RHNA targets and also would implement SCAG's land use goals and policies by primarily placing new development in areas with access to transit, jobs and services, thus minimizing vehicle trips and GHG emissions.

Upon its adoption by the City, the Housing Element Update would serve as a comprehensive statement of the City's housing policies and as a specific guide for program actions to be taken in support of those policies. The Housing Element Update is a policy document that encourages housing opportunities in infill areas. As discussed under *Description of Housing Element Update*, Under Housing Element law, the City must show that it has adequate land zoned to accommodate the entirety of its 2021-2029 RHNA allocation of 455,577 units under the Housing Element Law. Of these units, a total of 184,273 units must accommodate the City's lower-income RHNA, which means they must be identified on multi-family-zoned sites that have a minimum density of 30 du/acre, or in the R3 or a less restrictive zone. Recent changes to state Housing Element law have strengthened housing replacement requirements related to the Inventory of Sites. For example, the Inventory of Sites must demonstrate compliance with AB 686 by incorporating an analysis of how the sites are consistent with AFFH goals. For non-vacant sites, the methodology used to identify realistic development potential must consider factors such as existing uses, past development trends, market conditions, and the availability of regulatory and/or other development incentives. Furthermore, the Rezoning Program will be accomplished by 2024 through targeted zone changes, consistency with AFFH requirements, and updates to the City's community plans (Land Use Element), Density Bonus program, specific plans and overlays, and other zoning ordinances. The Rezoning Program may also consider rezoning or development incentives in existing lower density residential zones to create opportunities for missing middle housing typologies (up to low-medium residential density) in these areas. Adoption of the Housing Element Update would not grant entitlements for any project and future development proposals that are intended to assist in meeting the City's projected housing need, including those facilitated by the Rezoning Program, would be reviewed by the City for consistency with all adopted local and State laws, regulations, standards and policies. For the purposes of providing more robust analysis and disclosure of conflicts with any land use plan, policy, or regulation, this topic will be further discussed in the EIR.

#### **POTENTIALLY SIGNIFICANT IMPACT**

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## 12 Mineral Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### Safety Element Update

In order to ensure compliance with state law, the City anticipates amending the Safety Element to formally integrate related long-range planning efforts. Furthermore, updates to the Safety Element would involve updates to safety policies and requirements to provide consistency with the Housing Element Update, including those related to emergency response as part of the Local Hazard Mitigation Plan, which would provide guidance to minimize impacts associated with hazardous and unsafe conditions. Therefore, the Safety Element Update would not result in any adverse impacts related to mineral resources.

### Housing Element Update

- a. *Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?*

The Housing Element Update would prioritize new housing development on infill sites in urban areas well served by public transit. While the City contains petroleum deposits and designated areas for oil drilling, project development under the proposed project would primarily occur in existing commercial and residential areas, which are generally not compatible with mineral extraction. It is not anticipated that project development would occur on lands presently in use for mineral extraction. Furthermore, the Housing Element Update does not include any policies that related to mineral resources or conflict with existing General Plan policies and City ordinances regulating the conservation and use of mineral resources. Therefore, the proposed project would not result in a loss of availability of a known mineral resource and there would be no impact.

**NO IMPACT**

- b. Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?*

The California Surface Mining and Reclamation Act of 1975 (SMARA, PRC Section 2710 et seq.; subsequently amended) was enacted to promote conservation and protection of significant mineral deposits. SMARA requires the State to identify and classify mineral deposits within the State as either: (1) containing little or no mineral deposits (MRZ-1), (2) significant deposits (MRZ-2) or (3) deposits identified but further evaluation needed (MRZ-3 and MRZ-4). To comply with SMARA, the City adopted LAMC Section 13.03, which regulates the establishment of sand and gravel districts, extraction operations, mitigation of potential noise, dust, traffic, and other potential impacts, as well as post extraction site restoration. In addition, LAMC Section 13.01, which delineates where oil extraction is permitted and regulates oil extraction activities within the City, was adopted in 1953.

Rock, sand, and gravel deposits in the City lie along the Los Angeles River flood plain and coastal plain, with significant potential deposit sites identified by the State geologist along the Los Angeles River flood plain between the San Fernando Valley and Downtown Los Angeles (City of Los Angeles 2001). However, the only currently available gravel/sand deposit site in the City is the Tujunga alluvial fan located in the Sunland-Tujunga area of the City, as mining beach sand is not permitted by the State (City of Los Angeles 2001). Oil deposits underly portions of Downtown and West Los Angeles, as well as the harbor area and the Santa Monica and San Pedro Bays. There are twenty oil fields in the City that currently produce oil (City of Los Angeles 2001). Mineral resource extraction in the City is constrained by high levels of development, much of which took place prior to the enactment of SMARA and the classification of local minerals by the State geologist (City of Los Angeles 2001).

As discussed under impact discussion *a.* of this section, the Housing Element Update would prioritize new housing development on infill sites along dense transit corridors that primarily consist of commercial and mixed-use development, which are not considered compatible with mineral extraction. Project development under the proposed project could potentially occur on lands classified by the State geologist as having significant deposits of mineral resources, as many residential and commercial areas were established within the City prior to the mapping of mineral resources. However, as most of this development would be infill of existing urban spaces, these projects are not anticipated to directly impact mineral resources. Mineral resources in the City are subject to existing federal, State, and City policies and guidelines. Therefore, the proposed project would result in less than significant impacts related to statewide and regional mineral resources.

**LESS THAN SIGNIFICANT IMPACT**

# 13 Noise

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Generation of excessive groundborne vibration or groundborne noise levels?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Safety Element Update

In order to ensure compliance with state law, the City anticipates amending the Safety Element to formally integrate related long-range planning efforts. Furthermore, updates to the Safety Element would involve updates to safety policies and requirements to provide consistency with the Housing Element Update, including those related to emergency response as part of the Local Hazard Mitigation Plan, which would provide guidance to minimize impacts associated with hazardous and unsafe conditions. Therefore, the Safety Element Update would not result in any adverse impacts related to noise.

## Housing Element Update

The City has extensive regulatory requirements related to construction and operational noise in the City. Any future development projects would be required to comply with the following noise regulations described in the RCMs below:

- **RCM-NOI-1 (LAMC Noise Ordinances):** Development is required to comply with the City of Los Angeles Noise Ordinance No. 144,331 and 161,574 (see LAMC Section 112.05),

and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels.

- **RCM-NOI-2 (Construction Hours):** Construction is restricted to the hours of 7:00 AM to 9:00 PM Monday through Friday, and 8:00 AM to 6:00 PM on Saturday. LAMC Section 41.40.
  - **RCM-NOI-3 (Construction Site Notice):** Development is required to comply with the City of Los Angeles Building Regulations Ordinance No. 178,048 (see LAMC Section 91.106.4.8), which requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the site, and City telephone numbers where violations can be reported. The notice needs to be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public.
  - **RCM-NOI-4 (HVAC Noise):** Development is required to comply with the City of Los Angeles LAMC Section 112.02, which requires that any heating, ventilation, and air conditioning (HVAC) system within any zone of the City not cause an increase in ambient noise levels on any other occupied property or if a condominium, apartment house, duplex, or attached business, within any adjoining unit to exceed the ambient noise level by more than 5 dBA.
- a. *Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

The Los Angeles Noise Ordinance, Noise Element of the General Plan, and the Los Angeles Noise Compatibility Guidelines are the applicable noise-related standards and guidelines for Los Angeles. Project development could generate temporary noise levels in excess of allowable City standards. The operation of project development has the potential to generate vehicle trips to and from individual projects and include operational noise sources including, but not limited to, HVAC equipment and hauling/delivery vehicles. Operation of project development may have the potential to exceed operational thresholds for receiving land uses and sensitive receivers, if located nearby. Although individual developments would be required to comply with the regulations described in RCM-NOI-1 through RCM-NOI-4, potential noise impacts related to substantial temporary or permanent increases in noise, in excess of City standards, could occur and will be further analyzed in an EIR.

#### POTENTIALLY SIGNIFICANT IMPACT

- b. *Would the project result in generation of excessive groundborne vibration or groundborne noise levels?*

Construction activity can result in varying degrees of ground vibration depending on the equipment and methods employed. Operation of construction equipment causes vibrations that spread through the ground and diminish in strength with distance. Project development may result in excessive short- and/or long-term groundborne vibration or noise from construction or operation activities if located adjacent to sensitive receivers, such as residences, hospitals, schools, libraries, churches, or fragile buildings where vibration damage can occur. Issues related to groundborne vibration and groundborne noise will be evaluated in an EIR.

**POTENTIALLY SIGNIFICANT IMPACT**

- c. *For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?*

As discussed in Section 8, *Hazards and Hazardous Materials*, there are several airports within the City of Los Angeles or its vicinity, including the Los Angeles International Airport, Santa Monica Municipal Airport, Van Nuys Airport, Hollywood Burbank Airport, Long Beach Airport, San Gabriel Valley Airport, and Hawthorne Municipal Airport. The Housing Element Update would not contain policies that would conflict with the airport land use plans established by ALUC, nor would it emphasize building housing in the immediate vicinity of airports. If project development were proposed within two miles of an airport or within an airport influence area, it would be required to comply with applicable regulations and standards. This includes, but is not limited to, the 2019 CBC Title 24, Part 2, Section 1206.4 (Allowable Interior Noise Levels) of the California Code of Regulations which states that interior noise levels attributable to exterior sources shall not exceed 45 CNEL in any habitable room. In addition, adherence to California Noise Insulation Standards of 1988 (CBC Title 24, Section 3501 et seq.) requires that applicants with housing projects in the vicinity of an airport submit an acoustical analysis indicating that a 45 decibels (dB) or less will be achieved in each proposed habitable room. Nonetheless, project developments under the proposed project may be subject to excessive noise levels from overhead flights, particularly in neighborhoods within an airports' established noise controls. Potential impacts will be further evaluated in an EIR.

**POTENTIALLY SIGNIFICANT IMPACT**

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# 14 Population and Housing

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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Would the project:

- |   |   |   |   |   |
|---|---|---|---|---|
| a. Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)? | ■ | □ | □ | □ |
| b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?   | ■ | □ | □ | □ |

## Safety Element Update

In order to ensure compliance with state law, the City anticipates amending the Safety Element to formally integrate related long-range planning efforts. Furthermore, updates to the Safety Element would involve updates to safety policies and requirements to provide consistency with the Housing Element Update, including those related to emergency response as part of the Local Hazard Mitigation Plan, which would provide guidance to minimize impacts associated with hazardous and unsafe conditions. Therefore, the Safety Element Update is unlikely to result in any adverse impact related to population and housing. However, it is possible that new policies may discourage redevelopment of certain disaster-prone areas after a disaster, which could have the effect of displacement. Therefore, for the purposes of providing more robust analysis and disclosure, this topic will be further discussed in the EIR for impacts related to displacement.

## Housing Element Update

The City has established regulatory requirements related to the displacement of tenants within various types of housing. Future development under the proposed project would be required to comply with those regulations described in the RCMs below:

- RCM-PH-1 (Tenant Displacement):
  - **Apartment Converted to Condominium** - Prior to final map recordation, and pursuant to the provisions of Section 12.95.2-G and 47.06 of the LAMC, a tenant

relocation plan shall be submitted to the Los Angeles Housing Department for review and approval.

- **Apartment Demolition** - Prior to the issuance of a demolition permit, and pursuant to the provisions of Section 47.07 of the LAMC, a tenant relocation plan shall be submitted to the Los Angeles Housing Department for review and approval.
  - **Mobile Home Park Closure or Conversion to Different Use** - Prior to the issuance of any permit or recordation, and pursuant to the provisions of Section 47.08 and 47.09 of the LAMC, a tenant relocation plan and mobile home park closure impact report shall be submitted to the Los Angeles Housing Department for review and approval.
- a. *Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?*

The Housing Element Update would emphasize the creation of new housing units within urban infill areas of the City, which would increase development density throughout the City. As discussed in *Proposed Project*, project development involves the potential construction and operation of between 419,261 and 429,261 housing units to meet the City's RHNA, which is determined by SCAG to quantify the need for housing within each jurisdiction based on anticipated growth. The RHNA allocation is intended to accommodate forecasted population growth in addition to addressing overcrowding in the City. As such, the Housing Element Update would relieve overcrowding and existing cost burden, while also providing housing for the existing unsheltered and unhoused population. However, the project does have the potential to result in additional population growth beyond that forecasted by SCAG. Therefore, impacts related to direct population growth associated with the Housing Element Update will be further analyzed in an EIR. Other physical impacts associated with the development of up to 429,261 new housing units are either discussed in this Initial Study or will also be further analyzed in an EIR.

#### POTENTIALLY SIGNIFICANT IMPACT

- b. *Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?*

Project development would involve new development and redevelopment projects on infill sites within areas with existing public transit infrastructure. Redevelopment projects in particular may potentially result in the displacement of some existing housing units and residents. However, goals, policies, and objectives included the Housing Element Update aim to prevent displacement and promote housing stability. Under the Housing Element Update, all identified non-vacant sites are required to comply with the housing replacement requirements in Government Code Section 65583.2(g)(3), meaning that any multi-family residential development on a non- vacant site would be required to replace any existing on-site housing units that are subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of lower or very low income, or are otherwise subject to any form of rent or price control (including any that existing on-site within the

previous five years). In addition, the Housing Element Update would provide additional opportunities for housing by expanding areas where housing is allowed. The Housing Element Update is forecast to result in a substantial net increase in the number of available housing units in the City, including a total target zoned capacity of 230,338 units for lower-income households identified in the Sites Inventory, and it is anticipated that any replacement housing need created by displacement of existing housing would be more than offset through implementation of the Housing Element and potential re-zone program. Therefore, impacts related to displacement associated with the Housing Element Update would be less than significant. Nonetheless, as discussed under *Safety Element Update* of this section, the Safety Element Update's potential impacts related to displacement will be further discussed in the EIR.

**LESS THAN SIGNIFICANT IMPACT**

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# 15 Public Services

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
1 Fire protection?	■	□	□	□
2 Police protection?	■	□	□	□
3 Schools?	■	□	□	□
4 Parks?	■	□	□	□
5 Other public facilities?	□	□	■	□

## Safety Element Update

In order to ensure compliance with state law, the City anticipates amending the Safety Element to formally integrate related long-range planning efforts. Furthermore, updates to the Safety Element would involve updates to safety policies and requirements to provide consistency with the Housing Element Update, including those related to emergency response as part of the Local Hazard Mitigation Plan, which would provide guidance to minimize impacts associated with hazardous and unsafe conditions. Therefore, the Safety Element Update is unlikely to result in any adverse impact related to public services. However, for the purposes of providing more robust analysis and disclosure, this topic will be further discussed in the EIR as it relates to fire protection.

## Housing Element Update

The City and State law have established regulatory requirements for development projects that are intended to reduce impacts to public services. Project development would be subject to the regulations related to public services described in the following RCMs:

- **RCM-PS-1 (Payment of School Development Fee):** Prior to issuance of a building permit, the General Manager of the City of Los Angeles, Department of Building and Safety, or designee, is required to ensure that the Applicant has paid all applicable school facility development fees in accordance with California Government Code Section 65995.
- **RCM-PS-2 (Increased Demand for Parks or Recreational Facilities):**
  - **Subdivision:** Pursuant to Section 17.12 or 17.58 of the LAMC, the applicant is required to pay the applicable Quimby fees for the construction of dwelling units.
  - **Apartments:** Pursuant to Section 21.10 of the LAMC, the applicant is required to pay the Dwelling Unit Construction Tax for construction of apartment buildings to be used for parks and recreational facilities.
- **RCM-PS-3 (Increase Demand for Parks or Recreational Facilities – Zone Change):** Pursuant to Section 12.33 of the LAMC, the applicant is required to pay the applicable park fees for the construction of dwelling units.

*a.1. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, or the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?*

Fire protection in the City is provided by the LAFD. In particular, the primary duties of the LAFD Fire Development Services Unit is to conduct Fire Life Safety Plan Checks and Fire Life Safety Inspections, which aim to enforce applicable standards of the California Fire Code (Title 24, Part 9), California Code of Regulations Title 19, Los Angeles Fire Code (LAMC Chapter 5, Article 7), and LAMC Section 57.09.03, Section 57.09.06 and Section 57.09.07 concerning new construction and remodeling. Furthermore, the LAFD Hydrants and Access Unit reviews plans to evaluate adequacy of site access and hydrant placement. Potential impacts of the Housing Element Update, such as placing an unanticipated burden on fire protection services or affecting response times or service ratios, such that new or expanded fire protection facilities would be needed, will be further analyzed in an EIR. In addition, as discussed under *Safety Element Update* of this section, the potential impacts related to fire protection under the Safety Element Update will also be further analyzed in the EIR.

## POTENTIALLY SIGNIFICANT IMPACT

- a.2. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, or the need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?*

Police protection services in the City are provided by the Los Angeles Police Department (LAPD), which has approximately 9,000 sworn officers and 3,000 civilian employees. Based on these totals, this equates to approximately one officer for every 433 residents, giving Los Angeles one of the lowest ratios of police officers to residents of any major city in the country (LAPD 2020). Potential impacts of the Housing Element Update, such as placing an unanticipated burden on police protection services or affecting response times or service ratios, such that new or expanded police protection facilities would be needed, will be further analyzed in an EIR.

#### **POTENTIALLY SIGNIFICANT IMPACT**

- a.3. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered schools, or the need for new or physically altered schools, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?*

Project development can affect the need for new or physically altered school facilities when residential dwelling units are constructed and student population increases beyond existing capacity.

All development in California is subject to California Government Code Section 65995, which allows school districts to collect impact fees from developers of new residential projects. RCM-PS-1 (Payment of School Development Fee) would require future development projects under the proposed project to pay their fair share of impact fees to the school system. These fees are collected on residential development and may be used to pay for all of the following: land (purchased or leased) for school facilities, design of school facilities, permit and plan checking fees, construction or reconstruction of school facilities, testing and inspection of school sites and school buildings, furniture for use in new school facilities, and interim school facilities (purchased or leased) to house students generated by new development while permanent facilities are constructed.

The Housing Element Update would not directly affect local schools, but it may generate new students entering the Los Angeles Unified School District. Potential impacts of the Housing Element Update, such as placing an unanticipated burden on existing school facilities, such that new or expanded schools would be needed, will be further analyzed in an EIR.

#### **POTENTIALLY SIGNIFICANT IMPACT**

- a.4. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered parks, or the need for new or physically altered parks, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?*

Project development can affect the need for new or physically altered recreational facilities when residential dwelling units are constructed and demand increases beyond existing capacity. All future project development would be required to comply with the regulations described in RCMs-PS-2 (Increased Demand for Parks or Recreational Facilities) and RCM-PS-3 (Increase Demand for Parks or Recreational Facilities – Zone Change), which state that developers of individual development projects, with the exception of ADUs, would be required to pay park mitigation fees (for non-subdivision projects) or dedicate land or pay Quimby in-lieu fees (for subdivision projects) to mitigate for the increased demand placed on parks and recreational facilities. Park fee amounts are reviewed and updated annually by the City.

In 2012, the City's Department of Recreation and Parks launched the 50 Parks Initiative based on findings in the 2009 *Citywide Community Needs Assessment* indicating that park facilities are not equitably distributed across the City and that many communities do not have parks within a reasonable distance. The 50 Parks Initiative seeks to build 50 parks in densely populated neighborhoods or communities currently lacking sufficient park space and recreational facilities (DRP 2020). The 50 Parks Initiative exemplifies the kind of park facilities the City is currently implementing and is likely to continue implementing in the dense urban areas of Los Angeles. Most of the parks are pocket parks less than an acre in size with playground structures and exercise machines. These parks typically include zero or minimal structures and green space, and, because they are intended to serve the local community and be accessible by foot and bike, do not provide parking (Ferguson et al. 2014). The construction and operation of such small-scale facilities would be expected to have minimal environmental impacts. For example, these parks would be located on urban infill lots lacking biological or cultural resources; generate minimal vehicle traffic to the site which would limit air quality, GHG emissions, noise, and transportation impacts; and be able to accommodate a limited number of people due to their small size, which would reduce park noise levels. Existing regulations and General Plan policies would provide funding for the provision of new recreational facilities necessitated under the Housing Element Update. Although project development increase demand for additional recreational facilities, the lack of available space for new parks in the City would limit overall construction or alteration of parks and recreational facilities such that associated environmental impacts would be less than significant. Nonetheless, potential impacts of the Housing Element Update, such as placing an unanticipated burden on park services, such that new or expanded park facilities would be needed, will be further analyzed in an EIR.

#### **POTENTIALLY SIGNIFICANT IMPACT**



*a.5. Would the project result in substantial adverse physical impacts associated with the provision of other new or physically altered public facilities, or the need for other new or physically altered public facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?*

The Housing Element Update would emphasize the creation of new housing units within urban infill areas of the City, which could increase demand for other public facilities, such as libraries. Impacts related to increased demand for other public facilities such as stormwater, wastewater, and utility facilities are discussed in Section 19, *Utilities and Service Systems*. Project development could affect the need for new or physically altered libraries when residential dwelling units are constructed and demand increases beyond existing capacity. It is anticipated that potential future residents would likely use the Los Angeles Public Library (LAPL) system, potentially increasing the number of library facility users. According to the LAPL, however, 75 percent of L.A. residents visit the library less than once a month, and 18 percent have not visited a public library more than once in the last five years (LAPL 2015). Therefore, an increase in potential residents from project development is unlikely to result in a substantial increase in annual visits to library facilities. In addition, with the passage of Measure L in 2011, the LAPL is offering enhanced programs, expanded collections, additional technology, an expanded digital presence, and increased opportunities for connection within and between communities. The LAPL Strategic Plan 2015-2020 sets goals to increase the number of people who use library services and actively promote and market programs and services to increase overall engagement with the library. Demand for library facilities may also be offset over time due to increased use of digital materials available through LAPL's online catalog; circulation of e-media is expected to increase from 2,200,000 in 2014 to 3,000,000 in 2020 (LAPL 2015).

The proposed project is not expected to cause an exceedance of capacity at existing facilities or to generate a substantial demand for the community branch libraries serving the City, and it is unlikely that expansion or construction of new library facilities would be required. Since the Housing Element Update would not affect the need for new or physically altered public facilities, impacts would be less than significant.

#### **LESS THAN SIGNIFICANT IMPACT**

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# 16 Recreation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	■	□	□	□
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	■	□	□	□

## Safety Element Update

In order to ensure compliance with state law, the City anticipates amending the Safety Element to formally integrate related long-range planning efforts. Furthermore, updates to the Safety Element would involve updates to safety policies and requirements to provide consistency with the Housing Element Update, including those related to emergency response as part of the Local Hazard Mitigation Plan, which would provide guidance to minimize impacts associated with hazardous and unsafe conditions. Therefore, the Safety Element Update would not result in any adverse impacts related to recreation.

## Housing Element Update

- a. *Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?*

Project development could increase the use of existing neighborhood and regional parks. As discussed in *Proposed Project*, project development involves the potential construction and operation of between 419,261 and 429,261 housing units. This would increase demand for parks and recreational facilities, although as the City is highly urbanized and built out, there is not much space to build new parks to meet this need. Therefore, it is likely that existing parks would be used with greater frequency, potentially to the point of overuse and physical deterioration of facilities. Though future development projects would be required to comply with the regulations described in RCMs-PS-2 (Increased Demand for Parks or Recreational

Facilities) and RCM-PS-3 (Increase Demand for Parks or Recreational Facilities – Zone Change) related to the payment of park fees, if demand for these uses increases beyond existing capacity, substantial physical deterioration of these facilities could be accelerated. The potential impacts on existing neighborhood and regional facilities will be addressed further in an EIR.

**POTENTIALLY SIGNIFICANT IMPACT**

- b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?*

This impact is considered to be analogous to the impact discussed in Public Services for parks. The proposed project does not include the construction or expansion of parks but it is reasonably foreseeable that the indirect impact of the build out of the RHNA will result in the demand for new parks and the construction of new parks. This impact will be discussed in the EIR.

**POTENTIALLY SIGNIFICANT IMPACT**

# 17 Transportation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	■	□	□	□
b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	■	□	□	□
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?	■	□	□	□
d. Result in inadequate emergency access?	■	□	□	□

## Safety Element Update

In order to ensure compliance with state law, the City anticipates amending the Safety Element to formally integrate related long-range planning efforts. Furthermore, updates to the Safety Element would involve updates to safety policies and requirements to provide consistency with the Housing Element Update, including those related to emergency response as part of the Local Hazard Mitigation Plan, which would provide guidance to minimize impacts associated with hazardous and unsafe conditions. Therefore, the Safety Element Update would not result in any adverse impacts related to transportation, rather the Safety Element Update to improve policies and regulations associated with hazardous designs or inadequate emergency access.

## Housing Element Update

The City has established regulatory requirements to minimize the impacts of construction on transportation within the City. Future developments under the proposed project would be subject to the following regulations:

- **RCM-TRAF-1 (Major Transit and Transportation Construction Impact Area):** As applicable, development is required to comply with Chapter VI, Section 62.250 of the

LAMC, which established permitting requirements for projects that intend to perform activity or work in the streets (including sidewalks) within the Major Transit and Transportation Construction Impact Area. Major Transit and Transportation Construction Impact Areas include the following:

- **Area E:** The area bounded clockwise by North Hill Street, Bernard Street, North Broadway, North Spring Street, Los Angeles River (west bank) and the 101 Freeway.
  - **Area F:** The area bounded clockwise by North Figueroa Street, Marmion Way, Monte Vista Street, Avenue 61, Piedmont Avenue, Figueroa Street, Pasadena Avenue, North San Fernando Road, and the following street segments: Avenue 50 from Malta Street to Monte Vista Street, Avenue 52 from Figueroa Street to Echo Street, Avenue 54 from Ash Street to Monte Vista Street, Avenue 54 from Figueroa Street to Longfellow Street, Avenue 57 from Figueroa Street to Media Drive, Avenue 60 from Figueroa Street to Echo Street and Avenue 61 from Terrace Drive to Monte Vista Street.
  - **Area G:** The area bounded clockwise by Cesar E. Chavez Avenue, North Indiana Street, East 3rd Place, East 4th Street, Alameda Street, East 1st Street, North Hope Street, and North Grand Avenue.
  - **Area H:** The area bounded clockwise by Victory Boulevard, De Soto Avenue, Vanowen Street, Corbin Avenue, Victory Boulevard, Fulton Avenue, Oxnard Street, Coldwater Canyon Avenue, Burbank Boulevard, Vineland Avenue, Magnolia Boulevard, Woodman Avenue, Burbank Boulevard, Balboa Boulevard, Oxnard Street, Topham Street, Victory Boulevard, De Soto Avenue, Oxnard Street, and Variel Avenue.
  - **Area I:** The area bounded clockwise by Wilshire Boulevard, Bundy Drive, San Vicente Boulevard, Federal Avenue, Ohio Avenue, Veteran Avenue, Wilshire Boulevard to City Limit, Santa Monica Boulevard, Century Park East, West Pico Boulevard, Centinela Avenue, West Olympic Boulevard, and Centinela Avenue.
- a. *Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?*
  - b. *Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?*
  - c. *Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?*
  - d. *Would the project result in inadequate emergency access?*

The proposed project may allow for development of currently undeveloped parcels and for alteration, intensification, or redistribution of existing residential land uses. This could result in increased trips compared to existing conditions. Trips generated as a result of project development have the potential to impact intersection and roadway segments throughout the City. The proposed project may also conflict with applicable plans and policies addressing the circulation system. Potential impacts related to CEQA Guidelines Section 15064 pertaining to VMT and compliance with plans and policies that establish measures of effective

performance of the circulation system will be discussed in an EIR, as well as other transportation related issues, such as traffic hazards, incompatible uses, and emergency access.

**POTENTIALLY SIGNIFICANT IMPACT**

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# 18 Tribal Cultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant t Impact	No Impact
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Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in a Public Resources Code Section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- |   |   |   |   |   |
|---|---|---|---|---|
| <p>a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or</p>   | ■ | □ | □ | □ |
| <p>b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.</p> | ■ | □ | □ | □ |

## Safety Element Update

In order to ensure compliance with state law, the City anticipates amending the Safety Element to formally integrate related long-range planning efforts. Furthermore, updates to the Safety Element would involve updates to safety policies and requirements to provide consistency with the Housing Element Update, including those related to emergency response as part of the Local Hazard Mitigation Plan, which would provide guidance to minimize impacts associated with hazardous and unsafe conditions. Therefore, the Safety Element Update would not result in any adverse impacts related to tribal cultural resources.

## Housing Element Update

As of July 1, 2015, AB 52 of 2014 was enacted to expand CEQA by defining a new resource category, “tribal cultural resources.” AB 52 establishes that “a project with an effect that may

cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment” (PRC Section 21084.2). It further states that the lead agency shall establish measures to avoid impacts that would alter the significant characteristics of a tribal cultural resource, when feasible (PRC Section 21084.3).

PRC Section 21074 (a)(1)(A) and (B) define tribal cultural resources as “sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe” and is:

1. Listed or eligible for listing in the CRHR or in a local register of historical resources as defined in PRC Section 5020.1(k), or
2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. In applying these criteria, the lead agency shall consider the significance of the resource to a California Native American tribe.

AB 52 also establishes a formal consultation process for California tribes regarding those resources. The consultation process must be completed before a CEQA document can be certified or adopted. Under AB 52, lead agencies are required to “begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed Project.” Native American tribes to be included in the process are those that have requested notice of projects proposed within the jurisdiction of the lead agency.

- a. *Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074 that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?*
- b. *Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074 that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1?*

Project development would primarily occur on infill sites in areas with existing public transit infrastructure and in areas that have previously been developed and disturbed. It is likely that previous grading, construction, and modern use of the sites would have either removed or destroyed tribal cultural resources within surficial soils. Nonetheless, there is the potential for tribal cultural resources to exist below the ground surface throughout the City, which could be disturbed by grading and excavation activities associated with new housing development.

Consistent with AB 52, the City must consult with traditionally and culturally affiliated Native American tribes to determine if the Housing Element Update would result in a substantial adverse change in the significance of a tribal cultural resource. The City prepared and mailed AB 52 notification letters to each tribe listed by the NAHC on November 12, 2020.

The Fernandeano Tataviam Band of Mission Indians requested consultation with the City. The initial consultation meeting was held on December 1, 2020 and ongoing consultation has followed. No other tribes requested consultation. A summary of the consultation process and further evaluation of the project's potential impacts on important tribal cultural resources as part of AB 52 will be included in the EIR.

**POTENTIALLY SIGNIFICANT IMPACT**

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# 19 Utilities and Service Systems

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	■	□	□	□
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	■	□	□	□
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	■	□	□	□
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	□	□	■	□
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	□	□	■	□

## Safety Element Update

In order to ensure compliance with state law, the City anticipates amending the Safety Element to formally integrate related long-range planning efforts. Furthermore, updates to

the Safety Element would involve updates to safety policies and requirements to provide consistency with the Housing Element Update, including those related to emergency response as part of the Local Hazard Mitigation Plan, which would provide guidance to minimize impacts associated with hazardous and unsafe conditions. Therefore, the Safety Element Update is unlikely to result in any adverse impact related to utilities and service systems. However, expanded resiliency policy could potentially result in the relocation of critical infrastructure out of disaster-prone areas, and/or the expansion of utilities and infrastructure to improve resilience. Therefore, for the purposes of providing a more robust analysis and disclosure, this topic will be further discussed in the EIR.

### **Housing Element Update**

The City has established regulatory requirements related to water supply and solid waste, as well as those discussed in Section 6, *Energy*, and Section 8, *Greenhouse Gas Emissions*, related to sustainability. Project development would be subject to the regulations described in the following RCMs related to utilities and service systems:

- **RCM-UTIL-1 (Fire Water Flow):** The Project Applicant is required to consult with the LADBS and LAFD to determine fire flow requirements for the proposed project and will contact a Water Service Representative at the LADWP to order a SAR. This system hydraulic analysis will determine if existing LADWP water supply facilities can provide the proposed fire flow requirements of the Project. If water main or infrastructure upgrades are required, the Applicant is required to pay for such upgrades, which would be constructed by either the Applicant or LADWP.
- **RCM-UTIL-2 (Landscape):** Development is required to comply with Ordinance No. 170,978 (Water Management Ordinance), which imposes numerous water conservation measures in landscape, installation, and maintenance (e.g., use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray, set automatic sprinkler systems to irrigate during the early morning or evening hours to minimize water loss due to evaporation, and water less in the cooler months and during the rainy season).
- **RCM-UTIL-3 (Sewer Connection Regulations):** In compliance with LAMC Section 64.17, all project development would be required to obtain a sewer connection permit from the Board of Public Works to construct, alter, or repair any house connection sewer or any portion of any house connection sewer and comply with all regulations for sewer connection.
- **RCM-UTIL-4 (Designated Recycling Area):** In compliance with LAMC, development is required to provide readily accessible areas that serve the entire building and are identified for the depositing, storage, and collection of nonhazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, and metals.
- **RCM-UTIL-5 (Commercial/Multi-family Mandatory Recycling):** In compliance with AB341, recycling bins are required to be provided at appropriate locations to promote recycling of paper, metal, glass and other recyclable material. These bins are required to

be emptied and recycled accordingly as a part of the Proposed Project's regular solid waste disposal program. The project Applicant is required to only contract for waste disposal services with a company that recycles solid waste in compliance with AB341.

- **RCM-UTIL-6 (Construction Waste Recycling):** In order to meet the diversion goals of the City's Solid Waste Integrated Resources Plan (SWIRP), which seeks a diversion rate of 90 percent by the year 2025, the Applicant is required to salvage and recycle construction and demolition materials to ensure that a minimum of 70 percent of construction-related solid waste that can be recycled is diverted from the waste stream to be landfilled. Solid waste diversion would be accomplished through the on-site separation of materials and/or by contracting with a solid waste disposal facility that can guarantee a minimum diversion rate of 70 percent. In compliance with the LAMC, the General Contractor is required to utilize solid waste haulers, contractors, and recyclers who have obtained an Assembly Bill (AB) 939 Compliance Permit from the City of Los Angeles Bureau of Sanitation.
  - a. *Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?*

Project development would be concentrated in urban areas that are served by existing utilities infrastructure, including potable water, wastewater, stormwater drainage, electrical power, natural gas, and telecommunications facilities.

## Water Supply

Project development would require water for a variety of activities such as landscaping, controlling fugitive dust, and providing potable water to workers during construction and residents of the future development. As new housing development occurs incrementally throughout the City, upgrades to water conveyance facilities may be required. The precise location and connection would need to be determined at the time development is proposed. Should any new connections or upgrades be required, such upgrades would be subject to subsequent environmental review. Any future line size modifications or connections would be designed in accordance with applicable provisions of the LAMC and to the satisfaction of the City Engineer. Project development would be required to comply with the regulations described in RCM-GHG-1 through RCM-GHG-4, as discussed in Section 8, *Greenhouse Gas Emissions*, and RCM-UTIL-2 (Landscape). However, increased development density has the potential to impact the capacities of local utilities infrastructure, which may require the expansion or construction of new facilities. Therefore, this issue will be studied further in an EIR.

## Wastewater Generation

Wastewater treatment would be provided by existing infrastructure within the City. However, the amount of wastewater generated by project development is not known at this time and may exceed existing capacity. Project development would be required to comply

with the regulations to reduce water consumption. The Hyperion Water Reclamation Plant (HWRP) is located in the community of Playa Del Rey and has a treatment capacity of 450 mgd. The HWRP was designed to accommodate a maximum peak wet weather flow of 800 mgd. Project development has the potential to impact the capacities of the City's wastewater treatment conveyance systems, which may require the expansion or construction of new infrastructure or facilities. Therefore, this issue will be studied further in an EIR.

### **Stormwater**

Project development would likely include stormwater infrastructure to meet new demand. Although the new infill development would be located in an urban area that is served by existing stormwater drainage systems, the addition of new housing may exceed capacity of infrastructure. Future project development would be required to comply with RCM-GHG-1 through RCM-GHG-4, as discussed in Section 8, *Greenhouse Gas Emissions*, and RCM-UTIL-2 (Landscape) to reduce water consumption and install necessary stormwater facilities. However, project development has the potential to impact the capacities of local utilities infrastructure, which may require the expansion or construction of new facilities. Therefore, this issue will be studied further in an EIR.

### **Electricity, Natural Gas, and Telecommunications**

Electricity is currently provided to the City by LADWP and natural gas service is provided by Southern California Gas. Telecommunications services would be provided by AT&T, SBC Telecom, or other providers, at the discretion of future tenants. Telecommunications are generally available in the project area, and facility upgrades would not likely be necessary.

Operation and occupancy of project development would result in energy demand from the residences and transportation fuel from new vehicle trips. It is anticipated that the proposed project would increase demand for electricity, and natural gas, compared to existing conditions. As such, project development has the potential to impact the capacities of local utilities infrastructure, which may require the expansion or construction of new facilities. Therefore, this issue will be studied further in an EIR.

As discussed under *Safety Element Update* of this section, the potential impacts related to existing utilities infrastructure (i.e., potable water, wastewater, stormwater drainage, electrical power, natural gas, and telecommunications facilities) under the Safety Element Update will also be further analyzed in the EIR.

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- b. *Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?*

LADWP is responsible for providing water supply to the City while complying with County, State, and federal regulations. According to the City’s 2015 Urban Water Management Plan (UWMP), the primary LADWP sources of water supplies are water purchased from the Metropolitan Water District of Southern California (MWD), imported surface water, and local groundwater. Recycled water projects are progressing and expected to comprise a greater portion of LADWP water supply in the future. Overall, these sources of water provide the necessary water to meet LADWP’s water supply needs. In 2015, total water demand was 513,540 AFY. Table 9 through Table 11 show the 2015 UWMP water demand and supply projections from 2020 to 2040 based on normal weather conditions, single dry year conditions, and multiple dry year conditions (LADWP 2016).

The Los Angeles Aqueduct (LAA) has historically been the primary source of the City’s water supply. In recent years, however, the amount of water supplies from the LAA has been limited due to environmental concerns, and the City’s water supply relied heavily (average of 57 percent in recent years) on the purchased water from MWD delivered from the Colorado River or the Sacramento-San Joaquin Delta. Local ground water has been a reliable water source, providing an average of 12 percent of the total water supply, but there have been concerns in recent years due to declining groundwater level and contamination issues. The City’s recycled water supply is limited to specific projects in the City at this time (LADWP 2016).

**Table 9 LADWP Reliability Assessment for Average Weather Conditions**

Demand and Supply Projections (in acre-feet)	Average Year (FY2014-15)				
	Fiscal Year Ending June 30				
	2020	2025	2030	2035	2040
Total Water Demand <sup>1</sup>	611,800	644,700	652,900	661,800	675,700
pLAn Water Demand Target	485,600	533,000	540,100	551,100	565,600
<b>Existing/Planned Supplies</b>					
Conservation (Additional Active <sup>2</sup> and Passive <sup>3</sup> after FY 14/15)	125,800	110,900	111,600	109,100	108,100
Los Angeles Aqueduct <sup>4</sup>	275,700	293,400	291,000	288,600	286,200
Groundwater <sup>5</sup> (Net)	112,670	110,670	106,670	114,670	114,070
<b>Recycled Water</b>					
Irrigation and Industrial Use	19,800	29,000	39,000	42,200	45,400
Groundwater Replenishment	0	30,000	30,000	30,000	30,000

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Demand and Supply Projections (in acre-feet)	Average Year (FY2014-15) Fiscal Year Ending June 30				
	2020	2025	2030	2035	2040
Stormwater Capture					
Stormwater Reuse (Harvesting)	400	800	1,200	1,600	2,000
Stormwater Recharge (Increased Pumping)	2,000	4,000	8,000	15,000	15,000
Subtotal	536,370	578,770	587,470	601,170	600,770
<b>MWD Water Purchases</b>					
With Existing/Planned Supplies	75,430	65,930	65,430	60,630	74,930
<b>Total Supplies</b>	<b>611,800</b>	<b>644,700</b>	<b>652,900</b>	<b>661,800</b>	<b>675,700</b>
<b>Potential Supplies</b>					
Water Transfers <sup>6</sup>	40,000	40,000	40,000	40,000	40,000
Subtotal	40,000	40,000	40,000	40,000	40,000
<b>MWD Water Purchases</b>					
With Existing/Planned/Potential Supplies	35,430	25,930	25,430	20,630	34,930
<b>Total Supplies</b>	<b>611,800</b>	<b>644,700</b>	<b>652,900</b>	<b>661,800</b>	<b>675,700</b>

<sup>1</sup> Total Demand with existing passive conservation.

<sup>2</sup> Cumulative hardware savings since late 1980s reached 118,034 AFY by 2014-15.

<sup>3</sup> Additional non-hardware conservation required to meet water use reduction goals set in the Sustainable City pLAN.

<sup>4</sup> LADWP anticipates conserving 20,000 AFY of water usage for dust mitigation on Owens Lake after the Master Project is implemented in FY 2023-24. Los Angeles Aqueduct supply is estimated to decrease 0.1652% per year due to climate change impact.

<sup>5</sup> Net GW excludes Stormwater Recharge and Groundwater Replenishment supplies that contribute to increased pumping. The LADWP Groundwater Remediation project in the San Fernando Basin is expected in operation in 2021-22. Storage credit of 5,000 AFY will be used to maximize pumping in 2019-20 and thereafter. Sylmar Basin production will increase to 4,170 AFY from 2015-16 to 2038-39 to avoid the expiration of stored water credits, then go back to its entitlement of 3,570 AFY in 2039-40.

<sup>6</sup> Potential water transfer occurs in dry years with stored water acquired in average and wet years.

FY: fiscal year; AFY: acre-feet per year; MWD: Metropolitan Water District of Southern California; LADWP: Los Angeles Department of Water and Power

Source: LADWP 2016

**Table 10 LADWP Reliability Assessment for Single Dry Year Weather Conditions**

Demand and Supply Projections (in acre-feet)	Single Dry Year (FY2014-15) Fiscal Year Ending June 30				
	2020	2025	2030	2035	2040
Total Water Demand <sup>1</sup>	642,400	676,900	685,500	694,900	709,550
pLAN Water Demand Target	485,600	533,000	540,100	551,100	565,600
<b>Existing/Planned Supplies</b>					
Conservation (Additional Active <sup>2</sup> and Passive <sup>3</sup> after FY 14/15)	156,700	143,700	145,100	143,500	143,500
Los Angeles Aqueduct <sup>4</sup>	32,200	51,900	51,400	51,000	50,600
Groundwater <sup>5</sup> (Net)	112,670	110,670	106,670	114,670	114,070

Demand and Supply Projections (in acre-feet)	Single Dry Year (FY2014-15) Fiscal Year Ending June 30				
	2020	2025	2030	2035	2040
Recycled Water					
- Irrigation and Industrial Use	19,800	29,000	39,000	42,200	45,400
- Groundwater Replenishment	0	30,000	30,000	30,000	30,000
Stormwater Capture					
- Stormwater Reuse (Harvesting)	100	200	300	300	400
- Stormwater Recharge (Increased Pumping)	2,000	4,000	8,000	15,000	15,000
Subtotal	323,470	369,470	380,470	396,670	398,970
<b>MWD Water Purchases</b>					
With Existing/Planned Supplies	318,930	307,430	305,030	298,230	310,530
<b>Total Supplies</b>	<b>642,400</b>	<b>676,900</b>	<b>685,500</b>	<b>694,900</b>	<b>709,500</b>
<b>Potential Supplies</b>					
Water Transfers <sup>6</sup>	40,000	40,000	40,000	40,000	40,000
Subtotal	40,000	40,000	40,000	40,000	40,000
<b>MWD Water Purchases</b>					
With Existing/Planned/Potential Supplies	278,930	267,430	265,030	258,230	270,530
<b>Total Supplies</b>	<b>642,400</b>	<b>676,900</b>	<b>685,500</b>	<b>694,900</b>	<b>709,500</b>

<sup>1</sup> Total Demand with existing passive conservation.

<sup>2</sup> Cumulative hardware savings since late 1980s reached 118,034 AFY by 2014-15.

<sup>3</sup> Additional non-hardware conservation required to meet water use reduction goals set in the Sustainable City pLAN.

<sup>4</sup> LADWP anticipates conserving 20,000 AFY of water usage for dust mitigation on Owens Lake after the Master Project is implemented in FY 2023-24. Los Angeles Aqueduct supply is estimated to decrease 0.1652% per year due to climate change impact.

<sup>5</sup> Net GW excludes Stormwater Recharge and Groundwater Replenishment supplies that contribute to increased pumping. The LADWP Groundwater Remediation project in the San Fernando Basin is expected in operation in 2021-22. Storage credit of 5,000 AFY will be used to maximize pumping in 2019-20 and thereafter. Sylmar Basin production will increase to 4,170 AFY from 2015-16 to 2038-39 to avoid the expiration of stored water credits, then go back to its entitlement of 3,570 AFY in 2039-40.

<sup>6</sup> Potential water transfer occurs in dry years with stored water acquired in average and wet years.

FY: fiscal year; AFY: acre-feet per year; MWD: Metropolitan Water District of Southern California; LADWP: Los Angeles Department of Water and Power

Source: LADWP 2016

**Table 11 LADWP Reliability Assessment for Multiple Dry Year Weather Conditions**

Demand and Supply Projections (in acre-feet)	Multiple Dry Year (FY2014-15)				
	Fiscal Year Ending June 30				
	2020	2025	2030	2035	2040
Total Water Demand <sup>1</sup>	642,400	676,900	685,500	694,900	709,550
pLAN Water Demand Target	485,600	533,000	540,100	551,100	565,600
<b>Existing/Planned Supplies</b>					
Conservation (Additional Active <sup>2</sup> and Passive <sup>3</sup> after FY 14/15)	156,700	143,700	145,100	143,500	143,500
Los Angeles Aqueduct <sup>4</sup>	33,500	53,200	52,800	52,400	51,900
Groundwater <sup>5</sup> (Net)	112,670	110,670	106,670	114,670	114,070
Recycled Water					
- Irrigation and Industrial Use	19,800	29,000	39,000	42,200	45,400
- Groundwater Replenishment	0	30,000	30,000	30,000	30,000
Stormwater Capture					
- Stormwater Reuse (Harvesting)	100	200	300	300	400
- Stormwater Recharge (Increased Pumping)	2,000	4,000	8,000	15,000	15,000
Subtotal	324,770	370,770	381,870	398,070	400,270
<b>MWD Water Purchases</b>					
With Existing/Planned Supplies	317,630	306,130	303,630	296,830	309,230
<b>Total Supplies</b>	<b>642,400</b>	<b>676,900</b>	<b>685,500</b>	<b>694,900</b>	<b>709,500</b>
<b>Potential Supplies</b>					
Water Transfers <sup>6</sup>	40,000	40,000	40,000	40,000	40,000
Subtotal	40,000	40,000	40,000	40,000	40,000
<b>MWD Water Purchases</b>					
With Existing/Planned/Potential Supplies	277,630	266,130	263,630	256,830	269,230
<b>Total Supplies</b>	<b>642,400</b>	<b>676,900</b>	<b>685,500</b>	<b>694,900</b>	<b>709,500</b>

<sup>1</sup>Total Demand with existing passive conservation.

<sup>2</sup>Cumulative hardware savings since late 1980s reached 118,034 AFY by 2014-15.

<sup>3</sup>Additional non-hardware conservation required to meet water use reduction goals set in the Sustainable City pLAN.

<sup>4</sup>LADWP anticipates conserving 20,000 AFY of water usage for dust mitigation on Owens Lake after the Master Project is implemented in FY 2023-24. Los Angeles Aqueduct supply is estimated to decrease 0.1652% per year due to climate change impact.

<sup>5</sup>Net GW excludes Stormwater Recharge and Groundwater Replenishment supplies that contribute to increased pumping. The LADWP Groundwater Remediation project in the San Fernando Basin is expected in operation in 2021-22. Storage credit of 5,000 AFY will be used to maximize pumping in 2019-20 and thereafter. Sylmar Basin production will increase to 4,170 AFY from 2015-16 to 2038-39 to avoid the expiration of stored water credits, then go back to its entitlement of 3,570 AFY in 2039-40.

<sup>6</sup>Potential water transfer occurs in dry years with stored water acquired in average and wet years.

FY: fiscal year; AFY: acre-feet per year; MWD: Metropolitan Water District of Southern California; LADWP: Los Angeles Department of Water and Power

Source: LADWP 2016

Based on 2012 SCAG demographic data, the 2015 UWMP projects that the service area population would increase by approximately 423,900 new residents over the course of 25 years post 2015. Per the 2015 UWMP, current water supplies, planned future water conservation efforts, and planned future water supplies will enable LADWP to reliably provide water that meets the demands of the City for a 25-year planning horizon (LAWDP 2016). The 2015 UWMP indicates that water deliveries to the City totaled 513,540 AFY in 2015. Projected total water demand for the City under average year conditions for year 2040 is 675,700 AFY. Projected total water demand for the City for 2040 under single/multiple dry years conditions is 709,500 AFY. The 2015 UWMP projects an increase of 162,160 AFY (31.6 percent) during normal weather conditions and 195,960 AFY (38.2 percent) in water demand between 2015 and 2040 under single/multiple dry year conditions.

Project development would be required to comply with the City's water conservation ordinances and State policies, such as the Water Efficiency Requirements Ordinance, Los Angeles Green Building Code, and the latest CALGreen requirements. Compliance with these regulations would require new buildings to install water conservation fixtures, such as ultra-low-flush toilets, urinals, taps, and showerheads, and plumbing fixtures in order to obtain building permits in the City of Los Angeles. Meanwhile, existing buildings that could be converted to residential use under the Housing Element Update would be required to comply with the Existing Buildings Energy and Water Efficiency Program. The content of the Housing Element Update would not repeal, amend, or conflict with existing regulations and uniformly applied development regulations, such as the CALGreen and Water Efficiency Requirements ordinances, intended to avoid increased water demand effects.

Nonetheless, project development would involve up to 429,261 housing units in the City. The Housing Element Update would accommodate forecasted population growth, in addition to relieve overcrowding and existing cost burden, while also providing housing for the existing unsheltered and unhoused population. However, the project does have the potential to result in additional population growth beyond that forecasted by SCAG. Therefore, impacts to the City's water supply from project development will be further analyzed in an EIR.

#### **POTENTIALLY SIGNIFICANT IMPACT**

- c. *Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?*

Project development would be concentrated in urban areas served by existing wastewater treatment infrastructure operated by the City of Los Angeles. The City of Los Angeles sewer system includes more than 6,600 miles of sewers serving a population of approximately four million residents. The Los Angeles sewer system is comprised of three systems: Hyperion Sanitary Sewer System, Terminal Island Water Reclamation Plant Sanitary Sewer System, and Regional Sanitary Sewer System. Of these, the Hyperion Sanitary Sewer System is the largest of the City's sewer systems. The Hyperion Water Reclamation Plant (HWRP) is located in the community of Playa Del Rey and has a treatment capacity of 450 mgd. The HWRP was designed to accommodate a maximum peak wet weather flow of 800 mgd. However, increased development density has the potential to impact the capacities of local utilities infrastructure. Therefore, this issue will be studied further in an EIR.

**POTENTIALLY SIGNIFICANT IMPACT**

- d. *Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?*

The management of solid waste in Los Angeles involves public and private refuse collection services as well as public and private operation of solid waste transfer, resource recovery, and disposal facilities. The City has enacted numerous waste reduction and recycling programs in order to comply with the California Integrated Waste Management Act (AB 939), which require every city in California to divert at least 50 percent of its annual waste by the year 2000, and be consistent with AB 341, which sets a 75 percent recycling goal for California by 2020. As tracked by the City’s Zero Waste Progress Report, the City achieved a landfill diversion rate of 76.4 percent as of 2012 (City of Los Angeles Sanitation 2013). The City of Los Angeles has also prepared a Solid Waste Integrated Resources Plan (SWIRP), which contains long-term goals, objectives and policies for solid waste management for the City. It specifies that the City’s Zero Waste goal is to reduce, reuse, recycle, or convert the resources currently going to disposal so as to achieve an overall diversion rate of 90 percent or more by the year 2025 (LASAN 2013). The regulations described in RCM-UTIL-4 through RCM-UTIL-6 require future projects to implement construction and operational recycling practices to reduce waste and help meet the City’s Zero Waste goal.

As discussed in *Proposed Project*, project development involves the potential construction and operation of between 419,261 and 429,261 housing units. As shown in Table 12, project development would increase the amount of solid waste generated in the City by approximately 2,624 tons per day, or 957,760 tons per year, above existing conditions. This calculation does not take into consideration current and planned City programs to divert solid waste from landfills. For example, compliance with LAMC Section 66.32 would ensure that at least 75 percent of the demolition and construction waste generated by development under the proposed project would be diverted from landfills serving the City. In addition, the City will continue to implement waste reduction policies set forth by the RENEW LA Plan and the Framework Element.

**Table 12 Projected Solid Waste Generation in the City**

<b>New Dwelling Units (DU)</b>	<b>Daily Waste Generation Rate</b>	<b>Daily Waste Generation (lbs)</b>	<b>Daily Waste Generation (tons)</b>	<b>Annual Waste Generation (tons)</b>
429,261	12.23 lbs/du	5,249,862	2,624	957,760

Notes: DU – dwelling unit; lbs – pounds

Source: CalRecycle 2020. Residential rates were originally taken from the 2006 L.A. CEQA Thresholds Guide; the rate for public facilities was originally taken from the Draft EIR for the Central Commercial Redevelopment Project.

Table 13 lists the landfills currently serving the City of Los Angeles including their permitted capacity, remaining capacity, permitted daily intake capacity, and the average daily volume of solid waste received at each landfill (County of Los Angeles 2019). Based on the Los Angeles County Countywide Integrated Waste Management Plan (CIWMP) 2018 Annual Report, available capacity from Nonhazardous Solid Waste Landfills is expected for the next

15 years (CIWMP projections extend to 2033) and no new landfills are expected to be permitted during that time (County of Los Angeles 2019).

**Table 13 Solid Waste Facilities Serving the City of Los Angeles**

<b>Facility Name</b>	<b>Landfill Site Location</b>	<b>Remaining Capacity (tons)<sup>1</sup></b>	<b>Permitted Daily Intake capacity (tons/day)</b>	<b>2018 Average Disposal (tons/day)</b>
Antelope Valley	Palmdale	12,001,395	3,600	1,677
Calabasas	Agoura	4,908,186	3,500	1,030
Chiquita Canyon <sup>2</sup>	Castaic	59,752,250	12,000	2,307
Lancaster	Lancaster	10,231,322	3,000	376
Sunshine Canyon	Los Angeles	65,274,183	12,100	7,012
Scholl Canyon	Glendale	4,294,664	3,400	929
Southeast Resource Recovery Facility/b/	Long Beach	N/A	2,400	1,196
Azusa Land Reclamation	Azusa	57,716,118	6,500	1,358
<b>Totals</b>		<b>214,178,118</b>	<b>46,500</b>	<b>15,885</b>

<sup>1</sup>Remaining capacity as of June 2019.

Source: County of Los Angeles 2019

As show in Table 8, the combined daily intake capacity of landfills serving the City of Los Angeles is 46,500 tons per day and the average disposal intake is 15,885 tons per day. Therefore, available capacity (30,615 tons per day) can accommodate the estimated 2,624 tons per day of solid waste that would be generated by project development. Even assuming no diversion, the increase in generated solid waste associated with project development would represent about eight percent of the total available daily capacity.

With regard to the solid waste increase associated with project development, the handling of all debris and waste generated during construction would be subject to the State’s requirements under the California Integrated Waste Management Act AB 939 for salvaging, recycling, and reuse of materials from construction activity on the Project Site. Construction of new development projects may also involve site preparation activities that would generate waste materials; however, construction would be temporary and individual developers would be required to comply with the City’s Construction and Demolition (C&D) Waste Recycling Ordinance. All construction and demolition waste would be required to be taken to a certified C&D waste processor. These requirements would maximize waste stream diversions and help reduce solid waste disposal impacts and the City will continue to coordinate with the County regarding solid waste disposal capacity. Impacts related to the generation of solid waste would be less than significant.

**LESS THAN SIGNIFICANT IMPACT**



- e. *Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?*

A significant impact could occur if the Housing Element Update would conflict with any statutes and regulations governing solid waste. In compliance with State legislation, any project development would be required to implement a Solid Waste Diversion Program and divert at least 75 percent of the solid waste generated from the applicable landfill site. In addition, project development would comply with federal, State, and local statutes and regulations related to solid waste, such as the California Waste Integrated Waste Management Act (AB 939), the SWIRP, and the City's recycling program. Therefore, impacts related to conflict with statutes and regulations governing solid waste would be less than significant.

**LESS THAN SIGNIFICANT IMPACT**

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## 20 Wildfire

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### Safety Element Update

In order to ensure compliance with state law, the City anticipates amending the Safety Element to formally integrate related long-range planning efforts. Furthermore, updates to the Safety Element would involve updates to safety policies and requirements to provide consistency with the Housing Element Update, including those related to emergency response as part of the Local Hazard Mitigation Plan, which would provide guidance to minimize impacts associated with hazardous and unsafe conditions. Therefore, the Safety Element Update would not result in any adverse impacts related to transportation, rather the

Safety Element Update to improve policies and regulations associated with emergency response or evacuation plans and wildland fires.

## Housing Element Update

- a. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?*

Areas at risk for wildfire in the City are concentrated around the undeveloped hillsides and mountainous areas, such as the Santa Monica Mountains. The only State Responsibility Areas in the City are limited to a small area near the northeastern boundary of City (CalFIRE 2011). These areas are primarily developed with low-density, single-family residential uses. While the geographic distribution of development would largely occur in areas of the City that are currently zoned for multi-family residential and commercial development in proximity to transit, it is possible that individual project development sites are identified in any area where the zoning permits residential uses or as part of the Rezoning Program, including lower density residential sites in the vicinity of a Very High Fire Hazard Severity Zones (VHFHSZ). However, such development is not likely or anticipated on a level that would significantly conflict with an adopted emergency response plan or emergency evacuation plan.

As discussed in Section 9, *Hazards and Hazardous Materials*, construction activities could interfere with adopted emergency response or evacuation plans as a result of temporary construction activities within rights-of-way. However, temporary construction barricades or other obstructions used for project development that could impede emergency access would be subject to the City's permitting process, which requires a traffic control plan subject to City review and approval. Implementation of these plans would ensure that future development under the proposed project would not impair or physically interfere with adopted emergency response or evacuation procedures.

Increased housing development density in urban areas of the City under the proposed project could result in additional traffic within area roadways. However, in the event of a wildfire, implementation of the County's ERP would coordinate all the facilities and personnel of County government, along with the jurisdictional resources of the cities and special districts within the County, into an efficient organization capable of managing emergency evacuation for affected areas (see impact discussion *f.* under Section 9, *Hazards and Hazardous Materials*). The Los Angeles Department of Transportation and LAFD would be responsible for ensuring that future development does not impair adopted emergency response or evacuation plans. As part of standard development procedures, future housing development plans would be submitted for review and approval to ensure that all new development has adequate emergency access and escape routes in compliance with existing City regulations. Furthermore, the Housing Element Update would not introduce any features or policies that would preclude implementation of or alter these policies or procedures in any way or encourage housing development in VHFHSZ. Therefore, impacts would be less than significant.

**LESS THAN SIGNIFICANT IMPACT**

- b. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?*
- d. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?*

Portions of the City are subject to wildland fire risk, primarily in areas where single-family residential development abuts the undeveloped hillsides of the Santa Monica Mountains (City of Los Angeles 1996). Properties located within VHFHSZ as mapped by the CalFIRE and Fire Brush Clearance Zones are required to minimize fire risks during the high fire season through vegetation clearance, maintenance of landscape vegetation to minimize fuel supply that would spread the intensity of a fire, compliance with provisions for emergency vehicle access, use of approved building materials and design, and compliance with LAFD hazardous vegetation clearance requirements pursuant to the Los Angeles Fire Code (2017). The undeveloped portions of the Santa Monica Mountains are generally designated for Open Space and development opportunities in these areas are limited. Development opportunities in the hillside areas are further limited by single-family residential density regulations, slope density restrictions, and the topography.

In addition, the Housing Element Update would incentivize new housing development on urban infill sites within areas well served by high quality public transit. Therefore, project development under the proposed project would direct growth away from low-density neighborhoods, including hillside areas at risk of the spread of wildfire and subsequent downslope flooding and landslides. As such, development is not likely to expose project occupants to the uncontrolled spread of a wildfire or other associated risks including, but not limited to, flooding, landslides, and instability. Nonetheless, all development would be subject to applicable response plans and would be required to comply with the vegetation management, building materials, and emergency access requirements discussed under impact discussion *a.* of this section. In the event of a wildfire, implementation of the County's ERP would coordinate all the facilities and personnel of County government, along with the jurisdictional resources of the cities and special districts within the County, into an efficient organization capable of managing emergency evacuation for affected areas (see impact discussion *f.* under Section 9, *Hazards and Hazardous Materials*). Furthermore, project development would be required to be constructed according to the UBC requirements for fire-protection and would be subject to review and approval by the LAFD. The LAFD provides several fire developments services to the City related to enforcing codes concerning new construction and remodeling, including Fire Life Safety Plan Checks and Fire Life Safety Inspections.

Because the Housing Element Update would generally direct development away from the hillside areas with fire hazards and new development would be required to comply with fire safety provisions established by the Los Angeles Fire Code (2017), future development under the Housing Element Update would not pose a substantial risk to people or structures due to wildland fires. Impacts would be less than significant.

**LESS THAN SIGNIFICANT IMPACT**

- c. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?*

The Housing Element Update would prioritize the development of new housing in urban areas of the City near existing high-quality public transit infrastructure. As such, the proposed project would not encourage development in the low-density residential areas subject to wildfire risk. Project development would occur in areas that are well-served by existing roadways and utilities infrastructure. The proposed project would not be anticipated to require additional roads, fuel breaks, emergency water sources, power lines or other utilities that would exacerbate fire risk. As discussed in Section 16, *Transportation*, potential impacts related to the effective performance of the circulation system will be discussed in the EIR, as well as other transportation related issues, such as roads. Impacts would be less than significant.

**LESS THAN SIGNIFICANT IMPACT**

# 21 Mandatory Findings of Significance

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--	--------------------------------	--	------------------------------	-----------

Does the project:

- |  |   |   |   |   |
|--|---|---|---|---|
| <p>a. Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?</p> | ■ | □ | □ | □ |
| <p>b. Have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?</p>   | ■ | □ | □ | □ |
| <p>c. Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?</p>  | ■ | □ | □ | □ |

## Safety Element Update

In order to ensure compliance with state law, the City anticipates amending the Safety Element to formally integrate related long-range planning efforts. Furthermore, updates to the Safety Element would involve updates to safety policies and requirements to provide

consistency with the Housing Element Update, including those related to emergency response as part of the Local Hazard Mitigation Plan, which would provide guidance to minimize impacts associated with hazardous and unsafe conditions. Therefore, the Safety Element Update would not result in any adverse impacts related to mandatory findings of significance and would rather improve issues safety issues related to hazards and hazardous materials, transportation, and wildfires.

## **Housing Element Update**

- a. *Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?*

Project development may involve alteration, intensification, and redistribution of land uses in the City of Los Angeles. As discussed in Section 4, *Biological Resources*, proposed changes could have the potential to have a substantial adverse effect on species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations. As discussed in Section 5, *Cultural Resources*, Section 6, *Geology and Soils*, and Section 18, *Tribal Cultural Resources*, developments have the potential to impact historical, archaeological, paleontological, and tribal cultural resources. Since the Housing Element Update has the potential to degrade the quality of the environment, including plants, animals, and potential cultural and historical resources, this impact is potentially significant and will be further analyzed in an EIR.

### **POTENTIALLY SIGNIFICANT IMPACT**

- b. *Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?*

As discussed in Sections 1 through 20, the proposed project could result in significant impacts to aesthetics, air quality, biological resources, cultural resources, geology and soils, GHG emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, population and housing, public services, recreation, transportation, tribal cultural resources, and utilities and service systems. Potential cumulative impacts in these issue areas, for which potentially significant impacts have been identified, will be further analyzed in an EIR.

### **POTENTIALLY SIGNIFICANT IMPACT**



- c. *Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?*

In general, impacts to human beings are associated with air quality, hazards and hazardous materials, and noise. As discussed in Section 3, *Air Quality*, operation of project development could potentially generate criteria pollutant emissions exceeding the SCAQMD regional thresholds for operation and construction activities and may expose sensitive receptors in the City to substantial pollutant concentrations. As discussed in Section 9, *Hazards and Hazardous Materials*, there is the potential for future construction to involve the demolition or alteration of structures that could lead to a significant hazard to the public or environment by exposing future residents to potential on-site contamination if not properly identified. Therefore, since the Housing Element Update could potentially have harmful environmental effects that could affect humans either directly or indirectly, impacts would be potentially significant and these issues will be discussed in an EIR.

**POTENTIALLY SIGNIFICANT IMPACT**

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## List of Preparers

Rincon Consultants, Inc. prepared this Initial Study under contract to the City of Los Angeles. Persons involved in data gathering analysis, project management, and quality control are listed below.

### **RINCON CONSULTANTS, INC.**

Joe Power, AICP, Principal

Susanne Huerta, AICP, Project Manager/Supervising Planner

Brenna Vredevelde, Senior Biologist

Vanessa Villanueva, Environmental Planner

Emily Marino, Environmental Planner

Nik Kilpelainen, Environmental Planner

Beth Wilson, Environmental Planner



# Appendix B

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Scoping Comments

# Appendix B-1

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Agencies



Housing Element <housingelement@lacity.org>

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## SCH #: 2021010130, Los Angeles Citywide Housing Element 2021-2029 Update and Safety Element Update

3 messages

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**Gibson, Emily@DOT** <Emily.Gibson@dot.ca.gov>  
To: OPR State Clearinghouse <State.Clearinghouse@opr.ca.gov>  
Cc: "housingelement@lacity.org" <housingelement@lacity.org>

Wed, Feb 10, 2021 at 12:40 PM

Hello,

For your records, the attached letter is Caltrans District 7's response to the following project: **SCH #: 2021010130, Los Angeles Citywide Housing Element 2021-2029 Update and Safety Element Update**. The Lead Agency under CEQA, which is the City of Los Angeles, is CC'ed on this email.

Please let me know if you have any questions or need anything else from me.

Best regards,

### Emily Gibson

Associate Transportation Planner, Local Development-Intergovernmental Review

Caltrans District 7, Los Angeles

[Emily.Gibson@dot.ca.gov](mailto:Emily.Gibson@dot.ca.gov)

Work Cell Phone: 213-266-3562

*Note: Due to COVID-19, I am teleworking.*



**Response Letter\_03471\_SIGNED.pdf**

163K

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**OPR State Clearinghouse** <State.Clearinghouse@opr.ca.gov>  
To: "Gibson, Emily@DOT" <Emily.Gibson@dot.ca.gov>  
Cc: "housingelement@lacity.org" <housingelement@lacity.org>

Wed, Feb 10, 2021 at 2:06 PM

Thank you for your submittal, the SCH is in receipt of your *comment*.

[Quoted text hidden]

2/16/2021

City of Los Angeles Mail - SCH #: 2021010130, Los Angeles Citywide Housing Element 2021-2029 Update and Safety Element Update

**Housing Element** <housingelement@lacity.org>

Tue, Feb 16, 2021 at 10:16 AM

To: OPR State Clearinghouse <State.Clearinghouse@opr.ca.gov>

Cc: "Gibson, Emily@DOT" <Emily.Gibson@dot.ca.gov>

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]

**DEPARTMENT OF TRANSPORTATION**

DISTRICT 7 – Office of Regional Planning  
100 S. MAIN STREET, MS 16  
LOS ANGELES, CA 90012  
PHONE (213) 897-0475  
FAX (213) 897-1337  
TTY 711  
www.dot.ca.gov



Making Conservation  
a California Way of Life.

February 10, 2021

Cally Hardy  
City of Los Angeles  
Department of City Planning  
200 North Spring Street, Room 750  
Los Angeles, CA 90012

RE: Los Angeles Citywide Housing Element  
2021-2029 Update and Safety Element  
Update – Notice of Preparation of an  
Environmental Impact Report (NOP)  
SCH # 2021010130  
GTS # 07-LA-2021-03471

Dear Cally Hardy:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced NOP. The project involves updates to the City of Los Angeles General Plan Housing Element and Safety Element, and a Rezoning Program for the creation of additional housing units. The Housing Element Update will further the goal of meeting the existing and projected housing needs of all family income levels of the community; provide evidence of the City's ability to accommodate the Regional Housing Needs Assessment (RHNA) allocation through the year 2029; and identify a Rezoning Program to reach the required housing capacity. As of September 3, 2020, the City's Draft RHNA Allocation is 455,577 units. The City conservatively estimates that 419,261 to 429,261 units will be developed by 2029. Meanwhile, 36,316 units are considered already approved pipeline housing units. In addition, the Safety Element Update will formally integrate related long-range planning efforts to ensure compliance with State law. The City of Los Angeles is the Lead Agency under the California Environmental Quality Act (CEQA).

The project covers the City of Los Angeles, which includes several state facilities, such as the Interstate (I) 210, United States 101, State Route (SR) 134, SR-118, SR-170, I-405, I-10, I-110, I-105, I-5, and I-710. From reviewing the NOP, Caltrans has the following comments:

- Senate Bill 743 (2013) mandates that Vehicle Miles Traveled (VMT) be used as the primary metric in identifying transportation impacts of all future development projects under CEQA, starting July 1, 2020. For information on determining transportation impacts in terms of VMT on the State Highway System, see the *Technical Advisory on Evaluating Transportation Impacts in CEQA* by the California Governor's Office of Planning and Research (OPR), dated December 2018: [http://opr.ca.gov/docs/20190122-743\\_Technical\\_Advisory.pdf](http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf).
- The City can also refer to Caltrans' updated *Vehicle Miles Traveled-Focused Transportation Impact Study Guide* (TISG), dated May 2020 and released on Caltrans' website in July 2020: <https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-05-20-approved-vmt-focused-tisg-a11y.pdf>. Caltrans' new TISG is largely based on the OPR 2018 Technical Advisory.

- Caltrans looks forward to reviewing the VMT analysis for this project. As discussed in Caltrans' new TISG, Caltrans strongly recommends undertaking project VMT analysis, significance determination, and potential mitigation in a manner consistent with OPR's Technical Advisory.
- The updated TISG states, "Additional future guidance will include the basis for requesting transportation impact analysis that is not based on VMT. This guidance will include a simplified safety analysis approach that reduces risks to all road users and that focuses on multi-modal conflict analysis as well as access management issues." Since releasing the TISG, Caltrans has released interim safety analysis guidance, dated December 2020 and found here, for the County's reference: <https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-12-22-updated-interim-ldigr-safety-review-guidance-a11y.pdf>.
- Caltrans encourages lead agencies to complete traffic safety impact analysis in the CEQA review process so that, through partnerships and collaboration, California can reach zero fatalities and serious injuries by 2050.

The following information is included for your consideration.

The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. Furthermore, Caltrans encourages Lead Agencies to implement Transportation Demand Management (TDM) strategies that reduce VMT and Greenhouse Gas (GHG) emissions. For TDM strategies that the City can integrate into this project in order to reduce VMT to the greatest extent possible, please refer to:

- The 2010 *Quantifying Greenhouse Gas Mitigation Measures* report by the California Air Pollution Control Officers Association (CAPCOA), available at <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>, or
- *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8) by the Federal Highway Administration (FHWA), available at <https://ops.fhwa.dot.gov/publications/fhwahop12035/index.htm>.

Also, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. Caltrans recommends that housing unit construction be limited to traffic to off-peak periods to minimize the potential impact on State facilities. If construction traffic is expected to cause issues on any State facilities, please submit a construction traffic control plan detailing these issues for Caltrans' review.

If you have any questions about these comments, please contact Emily Gibson, the project coordinator, at [Emily.Gibson@dot.ca.gov](mailto:Emily.Gibson@dot.ca.gov), and refer to GTS # 07-LA-2021-03471.

Sincerely,



MIYA EDMONSON  
IGR/CEQA Branch Chief  
cc: Scott Morgan, State Clearinghouse



Housing Element <housingelement@lacity.org>

## Comment Letter from Councilmember Bonin: Wildfires and the Housing Element EIR

4 messages

**Jason Douglas** <jason.p.douglas@lacity.org> Tue, Feb 9, 2021 at 3:54 PM  
 To: Vince Bertoni <vince.bertoni@lacity.org>, Kevin Keller <kevin.keller@lacity.org>, Arthi Varma <arthi.varma@lacity.org>, Matthew Glesne <matthew.glesne@lacity.org>, Ann Sewill <ann.sewill@lacity.org>, Claudia Monterrosa <claudia.monterrosa@lacity.org>, Osama Younan <osama.younan@lacity.org>, Ralph Terrazas <ralph.terrazas@lacity.org>, Councilmember Bonin <councilmember.bonin@lacity.org>, housingelement@lacity.org  
 Cc: info@pacpalicc.org, info@brentwoodcommunitycouncil.org

Good Afternoon All,

Please see the attached correspondence / NOP Comment Letter from Councilmember Bonin regarding the Housing / Safety Element EIR as it relates to wildfire impacts analysis.

Thank you!

--



**Jason Patrick Douglas**  
 Senior Planning Deputy  
 Councilmember Mike Bonin  
 City of Los Angeles  
 213-473-7011 | [www.11thdistrict.com](http://www.11thdistrict.com)



[Sign Up for Mike's Email Updates](#)



**CD11 Comment Letter\_02.09.2021\_Housing Element CEQA and Wildfires.pdf**  
 842K

**Matthew Glesne** <matthew.glesne@lacity.org> Tue, Feb 9, 2021 at 4:58 PM  
 To: Housing Element <housingelement@lacity.org>, Cally Hardy <cally.hardy@lacity.org>, Blair Smith <blair.smith@lacity.org>

[Quoted text hidden]

--



**Matthew Glesne**  
 Preferred Pronouns: He, Him, His  
 Senior City Planner  
**Los Angeles City Planning**  
 200 N. Spring St., Room 750  
 Los Angeles, CA 90012  
 Planning4LA.org  
 T: (213) 978-2666



 **CD11 Comment Letter\_02.09.2021\_Housing Element CEQA and Wildfires.pdf**  
842K

**Cally Hardy** <cally.hardy@lacity.org>  
To: Jason Douglas <jason.p.douglas@lacity.org>  
Cc: Housing Element <housingelement@lacity.org>

Tue, Feb 9, 2021 at 5:09 PM

Jason:

Thank you, your email and attachments have been received for the record.

Regards,  
Cally

[Quoted text hidden]

--



LOS ANGELES  
CITY PLANNING

**Cally Hardy** (she/her/hers)  
City Planning Associate  
**Los Angeles City Planning**

200 N. Spring St., Room 750  
Los Angeles, CA 90012  
Planning4LA.org  
(213) 978-1643



**Bisnoff Email** <bisnoff@gmail.com>

Tue, Feb 9, 2021 at 7:01 PM

To: Jason Douglas <jason.p.douglas@lacity.org>  
Cc: Vince Bertoni <vince.bertoni@lacity.org>, Kevin Keller <kevin.keller@lacity.org>, Arthi Varma <arthi.varma@lacity.org>, Matthew Glesne <matthew.glesne@lacity.org>, Ann Sewill <ann.sewill@lacity.org>, Claudia Monterrosa <claudia.monterrosa@lacity.org>, Osama Younan <osama.younan@lacity.org>, Ralph Terrazas <ralph.terrazas@lacity.org>, Councilmember Bonin <councilmember.bonin@lacity.org>, Housing Element <housingelement@lacity.org>, PPCC <info@pacpalicc.org>, Brentwood Problems <info@brentwoodcommunitycouncil.org>

Jason,

We are extremely grateful the Councilman issued a request for the Housing Element to conduct a fire study. The Housing Element was greeted with utter disbelief at the obtuse "housing resource map" identifying the entire Fire Hazard Zone as a preferred location for high density housing,

Hopefully, we can move forward with a more informed approach thanks to Mike.

Thank you  
Michelle

**Michelle A. Bisnoff**

**Chair, Brentwood Community Council**

**Commissioner, City of Los Angeles Innovation and Performance Commission & Chair, Fund Committee**

**Board Member, Los Angeles County Animal Care Foundation**

*Disclaimer and Privacy Statement: While I am a member of the Brentwood Community Council, the foregoing may not represent the ratified position or views of the BCC.*

On Tue, Feb 9, 2021 at 3:55 PM Jason Douglas <jason.p.douglas@lacity.org> wrote:

[Quoted text hidden]





# MIKE BONIN

City of Los Angeles  
Councilmember, Eleventh District

Tuesday, February 9, 2021

Mr. Vince Bertoni  
Director of Planning  
Los Angeles City Planning  
200 North Spring Street, 5th Floor  
Los Angeles, California 90012  
Mail Stop 395

Dear Mr. Bertoni,

I am writing today to request a wildfire study in the Housing Element 2021-2029 and Safety Element Updates' Draft Environmental Impact Report (DEIR) due to my concern on the potential to increase our City's vulnerability to natural disasters in our Very High Fire Hazard Severity Zones (VHFHSZ).

On January 26 and 28, the Department of City Planning hosted two Environmental Impact Report (EIR) Scoping meetings on the potential environmental impacts of the Housing and Safety Element Updates. The initial study proposed that the following issue areas have no impact, or a less than significant impact: Agriculture and Forestry Resources, Energy, Mineral Resources, and Wildfire.

Wildfires, in particular, are of great concern to me and a significant threat to the life and property of my constituents. The Los Angeles region alone has experienced an average of 5 fires per year over the past several decades. Our District has been no stranger to wildfires as they have threatened residents in the region over the years:

- Erbes Fire - 250 acres in January, 2021
- Getty Fire - 745 acres in October, 2019
- Palisades Fire - 42 acres in October, 2019
- Wendy Fire - 91 acres in October, 2019
- Portola Fire - 20 acres in June, 2018
- Woolsey Fire - 96,949 acres in November, 2018
- Peak Fire - 186 acres in November, 2018
- Topanga Fire - 55 acres in June, 2017
- Stokes Fire - 41 acres in June, 2017
- Skirball Fire - 422 acres in December, 2017
- Potrero Fire - 50 acres in November, 2015

A contributing factor to wildfire vulnerability is development that encroaches into our District's Wildland Urban Interface (WUI) that creates a cumulative impact on our native vegetation, habitats, slope stability, scenic viewsheds, and watersheds to name a few. Continued expansion into the City's WUI should be analyzed to assess the appropriate land use policy and building codes required in these communities to mitigate potential wildfire risk.

**Westchester Office**

7166 W. Manchester Boulevard  
Los Angeles, CA 90045  
(310) 568-8772  
(310) 410-3946 Fax

**City Hall**

200 N. Spring Street, Room 475  
Los Angeles, CA 90012  
(213) 473-7011  
(213) 473-6926 Fax

**West Los Angeles Office**

1645 Corinth Avenue, Room 201  
Los Angeles, CA 90025  
(310) 575-8461  
(310) 575-8305 Fax



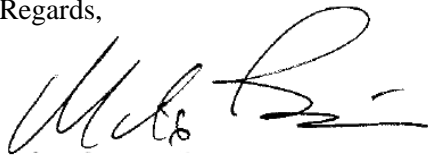
In particular, the CEQA analysis should consider how our hillside communities face far greater exposure to wildfires due to factors such as slope, prevailing winds, and vegetative fuel. Secondary impacts of wildfires that threaten these communities include the increased risk of debris flows, landslides, and flooding due to post-fire runoff, slope instability, or impaired drainage. Development in these areas may exacerbate wildfire conditions through extensive excavation, grading, and habitat destruction.

A CEQA analysis of wildfire should address the potential impacts development has on the community and environment in the VHFHSZ - particularly in hillside communities characterized by substandard infrastructure that may increase the vulnerability of residents and property to significant hazards, and impede emergency response and evacuation.

Thank you for the opportunity to comment and your consideration of this request. I am looking forward to reviewing the DEIR with a wildfire study when it becomes available to the public in late Spring of 2021, and working together to develop strategies in the Housing and Safety Element Updates to balance our housing needs with the City's goal to improve community resilience and recovery.

For further questions, please contact my Senior Planning Deputy, Jason P. Douglas at (213) 473-7011 or [jason.p.douglas@lacity.org](mailto:jason.p.douglas@lacity.org).

Regards,



**MIKE BONIN**  
Councilmember, 11<sup>th</sup> District

cc: Kevin Keller, Los Angeles City Planning  
Arthi Varma, Los Angeles City Planning  
Matthew Glesne, Los Angeles City Planning  
Ann Sewill, Housing + Community Investment Department  
Claudia Monterrosa, Housing + Community Investment Department  
Osama Younan, Department of Building and Safety  
Ralph M. Terrazas, Los Angeles Fire Department

MB: jpd



Housing Element &lt;housingelement@lacity.org&gt;

---

**Re: CDFW comments on the LA Citywide Housing and Safety Update NOP**

2 messages

**Cally Hardy** <cally.hardy@lacity.org>

Tue, Feb 9, 2021 at 5:08 PM

To: Felicia.Silva@wildlife.ca.gov

Cc: "Tang, Victoria@Wildlife" &lt;Victoria.Tang@wildlife.ca.gov&gt;, "Wilson-Olgin, Erinn@Wildlife" &lt;Erinn.Wilson-Olgin@wildlife.ca.gov&gt;, "Kwan-Davis, Ruby@Wildlife" &lt;Ruby.Kwan-Davis@wildlife.ca.gov&gt;, "Valand, Andrew@Wildlife" &lt;Andrew.Valand@wildlife.ca.gov&gt;, "Howell, Susan@Wildlife" &lt;Susan.Howell@wildlife.ca.gov&gt;, "state.clearinghouse@opr.ca.gov" &lt;state.clearinghouse@opr.ca.gov&gt;, Housing Element &lt;housingelement@lacity.org&gt;

Ms. Silva:

Thank you, your email and attachment have been received for the record.

Regards,  
Cally

On Tue, Feb 9, 2021 at 1:44 PM Silva, Felicia@Wildlife &lt;Felicia.Silva@wildlife.ca.gov&gt; wrote:

Good afternoon Ms. Hardy,

Please see the attached letter regarding CDFW's comments on the Notice of Preparation of a Draft Environmental Impact Report for the Los Angeles Citywide Housing Element 2021-2029 Update and Safety Element Update. If you have any questions or concerns relating to this letter, please feel free to contact CDFW at your convenience. Thank you for the opportunity to comment and have a good day.

Regards,

**Felicia Silva**

Environmental Scientist | California Department of Fish and Wildlife

South Coast | Region 5 | Habitat Conservation Planning Program

4665 Lampson Ave, Suite C | Los Alamitos, CA 90720

Temporary office number (562) 292-8105 | [Felicia.Silva@wildlife.ca.gov](mailto:Felicia.Silva@wildlife.ca.gov)

--

**Cally Hardy** (she/her/hers)  
City Planning Associate  
Los Angeles City Planning

2/16/2021

City of Los Angeles Mail - Re: CDFW comments on the LA Citywide Housing and Safety Update NOP



LOS ANGELES  
CITY PLANNING

200 N. Spring St., Room 750  
Los Angeles, CA 90012  
Planning4LA.org  
(213) 978-1643



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**Cally Hardy** <cally.hardy@lacity.org>  
To: Housing Element <housingelement@lacity.org>

Tue, Feb 9, 2021 at 5:18 PM

[Quoted text hidden]

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 **CDFW comments on LA Citywide Housing and Safety Update NOP.pdf**  
471K



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](http://www.wildlife.ca.gov)

**GAVIN NEWSOM, Governor**  
**CHARLTON H. BONHAM, Director**



February 9, 2021

Cally Hardy  
City of Los Angeles  
200 N Spring Street, Room 750  
Los Angeles CA, 90012  
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**Subject: Notice of Preparation of a Draft Environmental Impact Report for the Los Angeles Citywide Housing Element 2021-2029 Update and Safety Element Update Project, SCH #2021010130, City of Los Angeles, Los Angeles County**

Dear Ms. Hardy:

The California Department of Fish and Wildlife (CDFW) has reviewed the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) from the City of Los Angeles (City; Lead Agency) for the Los Angeles Citywide Housing Element 2021-2029 Update and Safety Element Update (Project). Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, 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's 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; California Environmental Quality Act (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", as defined by State law, of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 *et seq.*), or CESA-listed rare plant pursuant to 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.

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## Project Description and Summary

**Objective:** The Project involves updates to of the City of Los Angeles General Plan Housing Element and Safety Element. It also includes a Rezoning Program for the creation of additional housing units. The Housing Element Update will further the goal of meeting the existing and projected housing needs of all family income levels of the community; provide evidence of the City's ability to accommodate the Regional Housing Needs Assessment allocation through the year 2029; and identify a Rezoning Program to reach the required housing capacity. The Safety Element Update will formally integrate related long-range planning efforts to ensure compliance with State law.

**Location:** The Project would apply to the entire geographic area located within the boundaries of the City of Los Angeles, encompassing 467 square miles.

## Comments and Recommendations

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

### Specific Comments

- 1) Adequate Sites Inventory. CDFW recommends the City prepare a map of the following areas if present within or adjacent to the City boundary. In addition, the City should consider the Project's potential impacts on the following areas if present within or adjacent to the Project boundary:
  - a) Conservation easements or mitigation lands;
  - b) U.S. Fish and Wildlife Service [Threatened & Endangered Species Active Critical Habitat](#) (USFWS 2020);
  - c) City of Los Angeles Significant Ecological Areas (SEAs);
  - d) Wildlife corridors, such as those found in the Eastern Santa Monica Mountains;
  - e) Sensitive Natural Communities [see General Comment #3 (Biological Baseline Assessment)];
  - f) Aquatic and riparian resources including (but not limited to) rivers, channels, streams, wetlands, and vernal pools, and associated natural plant communities; and,
  - g) Urban forests, particularly areas with dense and large trees [see Specific Comment #4 (Loss of Bird and Raptor Nesting Habitat)].

CDFW recommends the City avoid sites that may have a direct or indirect impact on conservation easements or lands set aside as mitigation. CDFW recommends the DEIR include measures where future housing development facilitated by the Project mitigate (avoid if feasible) for impacts on biological resources occurring within SEAs and critical habitat, as well as mitigate for impacts on wildlife corridors, sensitive natural communities, aquatic and riparian resources, and urban forests.

- 2) Impacts on Wildlife Corridors and Wildlife. The [Eastern Santa Monica Mountains Habitat Linkage Planning Map](#) has identified habitat blocks and linkages in this area (SMMC, 2020). Based on review Figure 2 in the Initial Study, some of the City's areas identified as the

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“Highest Resource” may overlap with habitat blocks and linkages identified by the Eastern Santa Monica Mountains Habitat Linkage Map. CDFW is concerned that the Project would impact wildlife corridors. Additionally, development occurring adjacent to natural habitat areas such as wildlife corridors could have direct or indirect impacts on wildlife. Impacts could result from increased human presence, traffic, noise, and artificial lighting. Increased human-wildlife interactions could lead to injury or mortality of wildlife. For instance, as human population and communities expand into wildland areas, there has been a commensurate increase in direct and indirect interaction between mountain lions and people (CDFW 2013). As a result, the need to relocate or humanely euthanize mountain lions (depredation kills) may increase for public safety.

CDFW recommends the DEIR include measures where future housing development facilitated by the Project thoroughly analyze whether the project may impact wildlife corridors. Impacts include habitat loss and fragmentation, narrowing of a wildlife corridor, and introduction of barriers to wildlife movement. Additionally, CDFW recommends future development projects thoroughly analyze whether the project may have direct and indirect impacts wildlife resulting from increased human presence, traffic, noise, and artificial lighting.

- 3) Nesting Birds. CDFW recommends the DEIR include measures where future housing development facilitated by the Project avoids potential impacts to nesting birds. Project activities occurring during the bird and raptor breeding and nesting season could result in the incidental loss of fertile eggs or nestlings, or otherwise lead to nest abandonment.
  - a) Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (Code of Federal Regulations, Title 50, § 10.13). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). It is unlawful to take, possess, or needlessly destroy the nest or eggs of any raptor.
  - b) CDFW recommends that measures be taken to fully avoid impacts to nesting birds and raptors. Ground-disturbing activities (e.g., mobilizing, staging, drilling, and excavating) and vegetation removal should occur outside of the avian breeding season which generally runs from February 15 through August 31 (as early as January 1 for some raptors) to avoid take of birds, raptors, or their eggs.
  - c) If impacts to nesting birds and raptors cannot be avoided, CDFW recommends the DEIR include measures where future housing development facilitated by the Project mitigates for impacts. CDFW recommends surveys by a qualified biologist with experience conducting breeding bird and raptor surveys. Surveys are needed to detect protected native birds and raptors occurring in suitable nesting habitat that may be disturbed and any other such habitat within 300 feet of the project disturbance area, to the extent allowable and accessible. For raptors, this radius should be expanded to 500 feet and 0.5 mile for special status species, if feasible. Project personnel, including all contractors working on site, should be instructed on the sensitivity of the area. Reductions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.

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- 4) Loss of Bird and Raptor Nesting Habitat. The biggest threat to birds is habitat loss and conversion of natural vegetation into another land use such as development (e.g., commercial, residential, industrial). In the greater Los Angeles, urban forests and street trees, both native and some non-native species, provide habitat for a high diversity of birds (Wood and Esaian 2020). Some species of raptors have adapted to and exploited urban areas for breeding and nesting (Cooper et al. 2020). For example, raptors (*Accipitridae*, *Falconidae*) such as red-tailed hawks (*Buteo jamaicensis*) and Cooper's hawks (*Accipiter cooperii*) can nest successfully in urban sites. Red-tailed hawks commonly nest in ornamental vegetation such as eucalyptus (Cooper et al. 2020). According to iNaturalist, there are multiple observations of red-tailed hawks and Copper's hawks within the City.
- a) CDFW recommends the DEIR provide measures where future housing development facilitated by the Project avoids removal of any native trees, large and dense-canopied native and non-native trees, and trees occurring in high density (Wood and Esaian 2020). CDFW also recommends avoiding impacts to trees protected by the City's Heritage Tree Program and Tree Ordinance. CDFW also recommends avoiding impacts to understory vegetation (e.g., ground cover, subshrubs, shrubs, and trees).
  - b) If impacts to trees cannot be avoided, trees should be replaced to compensate for the temporal or permanent loss habitat within a project site. Depending on the status of the bird or raptor species impacted, replacement habitat acres should increase with the occurrence of a California Species of Special Concern. Replacement habitat acres should further increase with the occurrence of a CESA-listed threatened or endangered species.
  - c) CDFW recommends planting native tree species preferred by birds. This includes coast live oak (*Quercus agrifolia*) and California sycamore (*Platanus racemosa*) (Wood and Esaian 2020). CDFW recommends Audubon Society's [Plants for Birds](#) for more information on selecting native plants and trees beneficial to birds (Audubon Society 2020).
- 5) Bats. Numerous bat species are known to roost in trees and structures throughout Los Angeles County (Remington and Cooper 2014). In urbanized areas, bats use trees and man-made structures for daytime and nighttime roosts. Accordingly, CDFW recommends the DEIR provide measures where future housing development facilitated by the Project avoids potential impacts to bats.
- a) Bats are considered non-game mammals and are afforded protection by state law from take and/or harassment (Fish & G. Code, § 4150; Cal. Code of Regs., § 251.1). Project construction and activities, including (but not limited to) ground disturbance, vegetation removal, and any activities leading to increased noise levels may have direct and/or indirect impacts on bats and roosts.
  - b) CDFW recommends a project-level biological resources survey provide a thorough discussion and adequate disclosure of potential impacts to bats and roosts from project construction and activities including (but not limited to) ground-disturbing activities (e.g., mobilizing, staging, drilling, and excavating) and vegetation removal. If necessary, to reduce impacts to less than significant, a project-level environmental document should provide bat-specific avoidance and/or mitigation measures [CEQA Guidelines,



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§ 15126.4(a)(1)].

### General Comments

- 1) Disclosure. An environmental document should provide an adequate, complete, and detailed disclosure about the effect which a proposed project is likely to have on the environment (Pub. Resources Code, § 20161; CEQA Guidelines, §15151). Adequate disclosure is necessary so CDFW may provide comments on the adequacy of proposed avoidance, minimization, or mitigation measures, as well as to assess the significance of the specific impact relative to the species (e.g., current range, distribution, population trends, and connectivity).
- 2) Mitigation Measures. Public agencies have a duty under CEQA to prevent significant, avoidable damage to the environment by requiring changes in projects through the use of feasible alternatives or mitigation measures [CEQA Guidelines, §§ 15002(a)(3), 15021]. Pursuant to CEQA Guidelines section 15126.4, an environmental document shall describe feasible measures which could mitigate for impacts below a significant level under CEQA.
  - a) Level of Detail. Mitigation measures must be feasible, effective, implemented, and fully enforceable/imposed by the lead agency through permit conditions, agreements, or other legally binding instruments (Pub. Resources Code, § 21081.6(b); CEQA Guidelines, §§ 15126.4, 15041). A public agency shall provide the measures that are fully enforceable through permit conditions, agreements, or other measures (Pub. Resources Code, § 21081.6). CDFW recommends that the City prepare mitigation measures that are specific, detailed (i.e., responsible party, timing, specific actions, location), and clear in order for a measure to be fully enforceable and implemented successfully via a mitigation monitoring and/or reporting program (CEQA Guidelines, § 15097; Pub. Resources Code, § 21081.6). Adequate disclosure is necessary so CDFW may provide comments on the adequacy and feasibility of proposed mitigation measures.
  - b) Disclosure of Impacts. If a proposed mitigation measure would cause one or more significant effects, in addition to impacts caused by the Project as proposed, the environmental document should include a discussion of the effects of proposed mitigation measures [CEQA Guidelines, § 15126.4(a)(1)]. In that regard, the environmental document should provide an adequate, complete, and detailed disclosure about a project's proposed mitigation measure(s). Adequate disclosure is necessary so CDFW may assess the potential impacts of proposed mitigation measures.
- 3) Biological Baseline Assessment. An adequate biological resources assessment should provide a complete assessment and impact analysis of the flora and fauna within and adjacent to a project site and where a project may result in ground disturbance. The assessment and analysis should place emphasis upon identifying endangered, threatened, sensitive, regionally, and locally unique species, and sensitive habitats. Impact analysis will aid in determining any direct, indirect, and cumulative biological impacts, as well as specific mitigation or avoidance measures necessary to offset those impacts. CDFW recommends avoiding any sensitive natural communities found on or adjacent to a project. CDFW also considers impacts to Species of Special Concern a significant direct and cumulative adverse effect without implementing appropriate avoid and/or mitigation measures. A project-level

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environmental document should include the following information:

- a) Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region [CEQA Guidelines, § 15125(c)]. An environmental document should include measures to fully avoid and otherwise protect Sensitive Natural Communities from project-related impacts. CDFW considers these communities as threatened habitats having both regional and local significance. Plant communities, alliances, and associations with a state-wide ranking of S1, S2, S3 and S4 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by visiting [Vegetation Classification and Mapping Program - Natural Communities](#) webpage (CDFW 2020a);
- b) A thorough, recent, floristic-based assessment of special status plants and natural communities following CDFW's [Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities](#) (CDFW 2018). Adjoining habitat areas should be included where project construction and activities could lead to direct or indirect impacts off site;
- c) Floristic, alliance- and/or association-based mapping and vegetation impact assessments conducted at a project site and within the neighboring vicinity. The [Manual of California Vegetation](#) (MCV), second edition, should also be used to inform this mapping and assessment (Sawyer et al. 2009). Adjoining habitat areas should be included in this assessment where project activities could lead to direct or indirect impacts off site. Habitat mapping at the alliance level will help establish baseline vegetation conditions;
- d) A complete, recent, assessment of the biological resources associated with each habitat type on site and within adjacent areas that could also be affected by a project. CDFW's [California Natural Diversity Database](#) (CNDDDB) in Sacramento should be contacted to obtain current information on any previously reported sensitive species and habitat (CDFW 2020b). An assessment should include a nine-quadrangle search of the CNDDDB to determine a list of species potentially present at a project site. A lack of records in the CNDDDB does not mean that rare, threatened, or endangered plants and wildlife do not occur in the project site. Field verification for the presence or absence of sensitive species is necessary to provide a complete biological assessment for adequate CEQA review [CEQA Guidelines, § 15003(i)];
- e) A complete, recent, assessment of rare, threatened, and endangered, and other sensitive species on site and within the area of potential effect, including California Species of Special Concern, and California Fully Protected Species (Fish & G. Code, §§ 3511, 4700, 5050, and 5515). Species to be addressed should include all those which meet the CEQA definition of endangered, rare, or threatened species (CEQA Guidelines, § 15380). Seasonal variations in use of a project site should also be addressed such as wintering, roosting, nesting, and foraging habitat. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, may be required if suitable habitat is present. See CDFW's [Survey and Monitoring Protocols and Guidelines](#) for established survey protocol for select species (CDFW 2020c). Acceptable species-specific survey procedures may be developed in consultation with CDFW and the U.S. Fish and Wildlife

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Service; and,

- f) A recent wildlife and rare plant survey. CDFW generally considers biological field assessments for wildlife to be valid for a one-year period, and assessments for rare plants may be considered valid for a period of up to three years. Some aspects of a proposed project may warrant periodic updated surveys for certain sensitive taxa, particularly if build out could occur over a protracted time frame or in phases.
  - g) A biological resources survey should include identification and delineation of any rivers, streams, and lakes and their associated natural plant communities/habitats. This includes any culverts, ditches, storm channels that may transport water, sediment, pollutants, and discharge into rivers, streams, and lakes.
- 4) Data. CEQA requires that information developed in environmental impact reports be incorporated into a database which may be used to make subsequent or supplemental environmental determinations [Pub. Resources Code, § 21003, subd. (e)]. Accordingly, please report any special status species and natural communities detected by completing and submitting [CNDDDB Field Survey Forms](#) (CDFW 2020d). The City should ensure data collected at a project-level has been properly submitted, with all data fields applicable filled out. The data entry should also list pending development as a threat and then update this occurrence after impacts have occurred.
- 5) Biological Direct, Indirect, and Cumulative Impacts. CDFW recommends providing a thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts. The DEIR should address the following:
- a) A discussion regarding Project-related indirect impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands [e.g., preserve lands associated with a Natural Community Conservation Plan (NCCP, Fish & G. Code, § 2800 et. seq.)]. Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas, should be fully evaluated in the DEIR;
  - b) A discussion of both the short-term and long-term effects to species population distribution and concentration and alterations of the ecosystem supporting the species impacted [CEQA Guidelines, § 15126.2(a)];
  - c) A discussion of potential adverse impacts from lighting, noise, temporary and permanent human activity, and exotic species, and identification of any mitigation measures;
  - d) A discussion on Project-related changes on drainage patterns; the volume, velocity, and frequency of existing and post-Project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and, post-Project fate of runoff from the Project sites. The discussion should also address the potential water extraction activities and the potential resulting impacts on the habitat (if any) supported by the groundwater. Mitigation measures proposed to alleviate such Project impacts should be included;

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- e) An analysis of impacts from proposed changes to land use designations and zoning, and existing land use designation and zoning located nearby or adjacent to natural areas that may inadvertently contribute to wildlife-human interactions. A discussion of possible conflicts and mitigation measures to reduce these conflicts should be included in the DEIR; and,
  - f) A cumulative effects analysis, as described under CEQA Guidelines section 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant and wildlife species, habitat, and vegetation communities. If the City determines that the Project would not have a cumulative impact, the environmental document should indicate why the cumulative impact is not significant. The City's conclusion should be supported by facts and analyses [CEQA Guidelines, § 15130(a)(2)].
- 6) Project Description and Alternatives. To enable CDFW to adequately review and comment on the proposed Project from the standpoint of the protection of plants, fish, and wildlife, we recommend the following information be included in the DEIR:
- a) A complete discussion of the purpose and need for, and description of, the proposed Project;
  - b) CEQA Guidelines section 15126.6(a) states that an environmental document shall describe a reasonable range of potentially feasible alternatives to the Project, or to the location of the Project, which would feasibly attain most of the basic objectives of the Project but would avoid or substantially lessen any of the significant effects of the Project. CEQA Guidelines section 15126.6(f)(2) states if the Lead Agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion and should include reasons in the environmental document; and,
  - c) A range of feasible alternatives to Project component location and design features to avoid or otherwise minimize direct and indirect impacts to sensitive biological resources and wildlife movement areas. CDFW recommends the City consider configuring Project construction and activities, as well as the development footprint, in such a way as to fully avoid impacts to sensitive and special status plants and wildlife species, habitat, and sensitive vegetation communities. CDFW also recommends the City consider establishing appropriate setbacks from sensitive and special status biological resources. Setbacks should not be impacted by ground disturbance or hydrological changes for the duration of the Project and from any future development. As a general rule, CDFW recommends reducing or clustering the development footprint to retain unobstructed spaces for vegetation and wildlife and provide connections for wildlife between properties and minimize obstacles to open space.

Project alternatives should be thoroughly evaluated, even if an alternative would impede, to some degree, the attainment of the Project objectives or would be more costly (CEQA Guidelines, § 15126.6).

- d) Where the Project may impact aquatic and riparian resources, CDFW recommends the City consider alternatives that would fully avoid impacts to such resources. CDFW also recommends alternatives that would allow not impede, alter, or otherwise modify existing

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surface flow; watercourse and meander; and water-dependent ecosystems and vegetation communities. Project-related designs should consider elevated crossings to avoid channelizing or narrowing of streams. Any modifications to a river, creek, or stream may cause or magnify upstream bank erosion, channel incision, and drop in water level and cause the stream to alter its course of flow.

- 7) CESA. CDFW considers adverse impacts to a species protected by CESA to be significant without mitigation under CEQA. As to CESA, take of any endangered, threatened, candidate species, or CESA-listed plant species that results from the Project is prohibited, except as authorized by state law (Fish & G. Code §§ 2080, 2085; Cal. Code Regs., tit. 14, §786.9). Consequently, if the Project or any Project-related activity during the life of the Project will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, CDFW recommends that the Project proponent seek appropriate take authorization under CESA prior to implementing the Project. Appropriate authorization from CDFW may include an Incidental Take Permit (ITP) or a consistency determination in certain circumstances, among other options [Fish & Game Code, §§ 2080.1, 2081, subds. (b) and (c)]. Early consultation is encouraged, as significant modification to a Project and mitigation measures may be required in order to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, may require that CDFW issue a separate CEQA document for the issuance of an ITP unless the Project CEQA document addresses all Project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA ITP.
- 8) Jurisdictional Waters. As a Responsible Agency under CEQA, CDFW has authority over activities in streams and/or lakes that will divert or obstruct the natural flow, or change the bed, channel, or bank (including vegetation associated with the stream or lake) of a river or stream, or use material from a streambed. For any such activities, the project applicant (or "entity") must provide written notification to CDFW pursuant to Fish and Game Code Section 1600 *et seq.*
  - a) CDFW's issuance of a Lake and Streambed Alteration (LSA) Agreement for a project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. As a Responsible Agency, CDFW may consider the environmental document of the local jurisdiction (Lead Agency) for the project. To minimize additional requirements by CDFW pursuant to section 1600 *et seq.* and/or under CEQA, the environmental document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the LSA Agreement. Please visit CDFW's [Lake and Streambed Alteration Program](#) webpage for information about LSA Notification (CDFW 2020e).
  - b) In the event the project area may support aquatic, riparian, and wetland habitats; a preliminary delineation of the streams and their associated riparian habitats should be included in the environmental document. The delineation should be conducted pursuant to the U.S. Fish and Wildlife Service (USFWS) wetland definition adopted by CDFW (Cowardin et al. 1970). Be advised that some wetland and riparian habitats subject to CDFW's authority may extend beyond the jurisdictional limits of the U.S. Army Corps of

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Engineers' Section 404 permit and Regional Water Quality Control Board Section 401 Certification.

- c) In project areas which may support ephemeral or episodic streams, herbaceous vegetation, woody vegetation, and woodlands also serve to protect the integrity of these resources and help maintain natural sedimentation processes; therefore, CDFW recommends effective setbacks be established to maintain appropriately-sized vegetated buffer areas adjoining ephemeral drainages.
  - d) Project-related changes in upstream and downstream drainage patterns, runoff, and sedimentation should be included and evaluated in the environmental document.
  - e) As part of the LSA Notification process, CDFW requests a hydrological evaluation of the 100, 50, 25, 10, 5, and 2-year frequency storm event for existing and proposed conditions. CDFW recommends the environmental document evaluate the results and address avoidance, minimization, and/or mitigation measures that may be necessary to reduce potential significant impacts.
- 9) Wetland Resources. CDFW, as described in Fish and Game Code section 703(a), is guided by the Fish and Game Commission's (Commission) policies. The [Wetlands Resources](#) policy the Commission "...seek[s] to provide for the protection, preservation, restoration, enhancement and expansion of wetland habitat in California (CFGC 2020). Further, it is the policy of the Fish and Game Commission to strongly discourage development in or conversion of wetlands. It opposes, consistent with its legal authority, any development or conversion that would result in a reduction of wetland acreage or wetland habitat values. To that end, the Commission opposes wetland development proposals unless, at a minimum, project mitigation assures there will be 'no net loss' of either wetland habitat values or acreage. The Commission strongly prefers mitigation which would achieve expansion of wetland acreage and enhancement of wetland habitat values."
- a) The Wetlands Resources policy provides a framework for maintaining wetland resources and establishes mitigation guidance. CDFW encourages avoidance of wetland resources as a primary mitigation measure and discourages the development or type conversion of wetlands to uplands. CDFW encourages activities that would avoid the reduction of wetland acreage, function, or habitat values. Once avoidance and minimization measures have been exhausted, a project must include mitigation measures to assure a "no net loss" of either wetland habitat values, or acreage, for unavoidable impacts to wetland resources. Conversions include, but are not limited to, conversion to subsurface drains, placement of fill or building of structures within the wetland, and channelization or removal of materials from the streambed. All wetlands and watercourses, whether ephemeral, intermittent, or perennial, should be retained and provided with substantial setbacks, which preserve the riparian and aquatic values and functions for the benefit to on-site and off-site wildlife populations. CDFW recommends mitigation measures to compensate for unavoidable impacts be included in an environmental document and these measures should compensate for the loss of function and value.
  - b) The Fish and Game Commission's Water policy guides CDFW on the quantity and quality of the waters of this State that should be apportioned and maintained respectively so as to produce and sustain maximum numbers of fish and wildlife; to provide

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maximum protection and enhancement of fish and wildlife and their habitat; encourage and support programs to maintain or restore a high quality of the waters of this State; prevent the degradation thereof caused by pollution and contamination; and, endeavor to keep as much water as possible open and accessible to the public for the use and enjoyment of fish and wildlife. CDFW recommends avoidance of water practices and structures that use excessive amounts of water, and minimization of impacts that negatively affect water quality, to the extent feasible (Fish & G. Code, § 5650).

- 10) Translocation/Salvage of Plants and Animal Species. Translocation and transplantation is the process of moving an individual from a project site and permanently moving it to a new location. CDFW generally does not support the use of translocation or transplantation as the primary mitigation strategy for unavoidable impacts to rare, threatened, or endangered plant or animal species. Studies have shown that these efforts are experimental and the outcome unreliable. CDFW has found that permanent preservation and management of habitat capable of supporting these species is often a more effective long-term strategy for conserving sensitive plants and animals and their habitats.
- 11) Compensatory Mitigation. An environmental document should include mitigation measures for adverse Project related direct or indirect impacts to sensitive plants, animals, and habitats. Mitigation measures should emphasize avoidance and reduction of project-related impacts. For unavoidable impacts, on-site habitat restoration or enhancement should be discussed in detail. If on-site mitigation is not feasible or would not be biologically viable and therefore not adequately mitigate the loss of biological functions and values, off-site mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed. Areas proposed as mitigation lands should be protected in perpetuity with a conservation easement, financial assurance and dedicated to a qualified entity for long-term management and monitoring. Under Government Code, section 65967, the Lead Agency must exercise due diligence in reviewing the qualifications of a governmental entity, special district, or nonprofit organization to effectively manage and steward land, water, or natural resources on mitigation lands it approves.
- 12) Long-term Management of Mitigation Lands. For proposed preservation and/or restoration, an environmental document should include measures to protect the targeted habitat values from direct and indirect negative impacts in perpetuity. The objective should be to offset the project-induced qualitative and quantitative losses of wildlife habitat values. Issues that should be addressed include (but are not limited to) restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, and increased human intrusion. An appropriate non-wasting endowment should be set aside to provide for long-term management of mitigation lands.

## Conclusion

We appreciate the opportunity to comment on the NOP for the Los Angeles Citywide Housing Element 2021-2029 Update and Safety Element Update to assist the City of Los Angeles in identifying and mitigating Project impacts on biological resources. If you have any questions or comments regarding this letter, please contact Felicia Silva, Environmental Scientist, at [Felicia.Silva@wildlife.ca.gov](mailto:Felicia.Silva@wildlife.ca.gov).

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Sincerely,

DocuSigned by:

*Erinn Wilson-Olgin*

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ec: CDFW

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State Clearinghouse, Sacramento – [State.Clearinghouse@opr.ca.gov](mailto:State.Clearinghouse@opr.ca.gov)

## References

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Cally Hardy  
City of Los Angeles  
February 9, 2021  
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Housing Element <housingelement@lacity.org>

**Fwd: 063 – LM – Environmental Document Review – SCH # 2021010130**

2 messages

**Cally Hardy** <cally.hardy@lacity.org>  
To: Housing Element <housingelement@lacity.org>

Thu, Jan 28, 2021 at 10:41 AM

----- Forwarded message -----

From: **Saunders, Joseph@CHP** <JCSaunders@chp.ca.gov>  
Date: Thu, Jan 28, 2021 at 10:40 AM  
Subject: 063 – LM – Environmental Document Review – SCH # 2021010130  
To: [cally.hardy@lacity.org](mailto:cally.hardy@lacity.org) <cally.hardy@lacity.org>  
Cc: [state.clearinghouse@opr.ca.gov](mailto:state.clearinghouse@opr.ca.gov) <state.clearinghouse@opr.ca.gov>, Mora, Leah@CHP <LeMora@chp.ca.gov>

Good morning,

No impact to Southern Division’s local operations and/or public safety by SCH#2021010130 was identified.

Thank you,

Joseph Saunders, Sergeant



Southern Division

Staff Services

411 N. Central Avenue, suite 410

Glendale, CA 91203

(818) 240-8200

(818) 240-1496 (fax)

Email: [jcsaunders@chp.ca.gov](mailto:jcsaunders@chp.ca.gov)

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**Cally Hardy** (she/her/hers)  
 City Planning Associate  
**Los Angeles City Planning**  
 200 N. Spring St., Room 750  
 Los Angeles, CA 90012  
 Planning4LA.org  
 (213) 978-1643




---

**2 attachments**

 **2021010130.pdf**  
 579K

 **Area-Section EIR RESPONSE CHECKLIST.DOCX**  
 17K

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**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:31 PM

To: JCSaunders@chp.ca.gov

Cc: Cally Hardy <cally.hardy@lacity.org>, state.clearinghouse@opr.ca.gov, "Leah@CHP" <LeMora@chp.ca.gov>

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
 The Housing Element Team

[Quoted text hidden]

**M e m o r a n d u m**

Date: January 27, 2021

To: Southern Division

From: **DEPARTMENT OF CALIFORNIA HIGHWAY PATROL**  
Special Projects Section

File No.: 063.A10212.A14630.Nop.Doc

Subject: ENVIRONMENTAL DOCUMENT REVIEW AND RESPONSE  
SCH# 2021010130

Special Projects Section (SPS) recently received the referenced “Notice of Preparation” environmental impact document from the State Clearinghouse (SCH).

Due to the project’s geographical proximity to Southern Division, please use the attached checklist to assess its potential impact to local Area operations and public safety. If it is determined that departmental input is advisable, your written comments referencing the above SCH number must be sent to the lead agency and emailed to [state.clearinghouse@opr.ca.gov](mailto:state.clearinghouse@opr.ca.gov). Your written comments must be received by the lead agency no later than **February 15, 2021**. For reference, additional information can be found in General Order 41.2, Environmental Impact Documents.

For project tracking purposes, SPS must be notified of Southern Division’s assessment of the project (including negative reports). Please e-mail a copy of Division’s response to Associate Governmental Program Analyst Leah Mora at [LeMora@chp.ca.gov](mailto:LeMora@chp.ca.gov). For questions or concerns, please contact Mrs. Mora at (916) 843-3370.

*Denise Dobson For*

L. NARVAEZ, SSM III  
Commander

Attachments: Checklist  
Project File



**ENVIRONMENTAL IMPACT REPORT  
EVALUATION/RESPONSE CHECKLIST  
FOR AREA/SECTION**

Reference: General Order 41.2

	Action	Reference GO 41.2
<input type="checkbox"/>	Review memorandum for the due date(s).	
<input type="checkbox"/>	Determine if the proposed project might impact local operations and/or public safety. Examples include: housing developments, large commercial projects, large recreational developments or expansions, landfill or quarry operations, hazardous materials storage and/or dump sites, highway construction/improvement projects, new schools, airport improvements, annexations/incorporations, off-highway vehicle facilities, and Indian gaming facilities.	Page 5
<input type="checkbox"/>	Review environmental impact documents to identify issues or concerns with possible impact to departmental operations (i.e., increased response times, enforcement, emergency services, service calls, telecommunications, public safety).	
<b>Responses</b>		
<input type="checkbox"/>	<u>If comments are advisable:</u>	
<input type="checkbox"/>	Correspondence should focus primarily on traffic safety, congestion, or other impacts to the CHP's mission; however, <b>Areas shall not indicate to the lead agency that additional personnel, facilities, vehicles, etc., are a means to mitigate departmental service issues.</b>	Page 7
<input type="checkbox"/>	Ensure the State Clearinghouse number (SCH#) is included in all correspondence.	
<input type="checkbox"/>	Comments shall be provided directly to the lead agency and emailed to State Clearinghouse at <a href="mailto:state.clearinghouse@opr.ca.gov">state.clearinghouse@opr.ca.gov</a> no later than the designated due date. Provide a copy to Special Projects Section (SPS) via electronic mail (e-mail).	
<input type="checkbox"/>	For project tracking purposes, SPS must be notified of Area/Section's assessment of the project. After mailing your comments to the SCH or lead agency, send a scanned copy via e-mail to SPS.	
<input type="checkbox"/>	<u>If no impact is determined:</u>	
<input type="checkbox"/>	Via e-mail, please respond "no impact to _____ Area's local operations and/or public safety by SCH# _____ was identified," by the designated SCH due date to the SPS analyst listed on the Environmental Document Review and Response memorandum. Ensure the SCH# is included.	



Housing Element <housingelement@lacity.org>

# Los Angeles Citywide Housing Element 2021-2029 Update

2 messages

**Raza, Adriana** <araza@lacsds.org>  
To: "housingelement@lacity.org" <housingelement@lacity.org>

Wed, Mar 10, 2021 at 6:30 AM

Cally,

Attached please find a pdf copy of the subject NOP Response Letter.

## Adriana Raza

Customer Service Specialist | Will Serve Desk

562-908-4288 ext. 2717 | Facilities Planning Department

[araza@lacsds.org](mailto:araza@lacsds.org)



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

[Website](#) | [Facebook](#) | [Twitter](#) | [Instagram](#) | [YouTube](#)

**LA\_Citywide\_Housing\_Element\_2021-2029\_Update.pdf**  
382K

**Housing Element** <housingelement@lacity.org>  
To: "Raza, Adriana" <araza@lacsds.org>

Thu, Mar 25, 2021 at 9:29 AM

Thank you, your email and attachment have been received.

Regards,  
The Housing Element Team  
[Quoted text hidden]



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

**Robert C. Ferrante**

Chief Engineer and General Manager

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

March 9, 2021

Ref. DOC 6034825

Ms. Cally Hardy, City Planning Associate  
Department of City Planning  
City of Los Angeles  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

Dear Ms. Hardy:

**NOP Response for the Citywide Housing Element  
2021–2029 Update, Case Numbers: CPC-2020-1365-GPA; ENV-2020-6762-EIR**

The Los Angeles County Sanitation Districts (Districts) received a Notice of Preparation of a Draft Environmental Impact Report (NOP) for the subject project on January 15, 2021. Portions of the City of Los Angeles (City) are located within the jurisdictional boundaries of Districts Nos. 1, 2, 3, 4, 5, 8, 9 and 16. We offer the following comments regarding sewerage service:

- The Districts should review individual developments within the City to determine if Districts' facilities will be affected by the project and whether or not sufficient trunk sewer capacity exists to serve each project.

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717 or at [araza@lacsd.org](mailto:araza@lacsd.org).

Very truly yours,

Adriana Raza  
Customer Service Specialist  
Facilities Planning Department

AR:ar



Housing Element &lt;housingelement@lacity.org&gt;

---

**Re: CEQA Response Letter Request for Citywide Housing Element 2021-2029**

1 message

---

**Cally Hardy** <cally.hardy@lacity.org>  
To: Sunbula Azieh <sunbula.azieh@lacity.org>  
Cc: Housing Element <housingelement@lacity.org>

Wed, Mar 10, 2021 at 8:54 AM

Sunbula,

Thank you for your email. The Scoping period for this project closed on February 15. No consultation or response is needed on our part at this time; however, if you wish to comment on the NOP we can receive the comments for the environmental case file. Additionally, we will provide an opportunity for review and comment on the DEIR when it is released later this spring.

Regards,  
Cally

On Mon, Mar 1, 2021 at 1:28 PM Sunbula Azieh <sunbula.azieh@lacity.org> wrote:

Hello Ms. Hardy,

Wastewater Engineering Services Division has recently received the attached letter from your office for the Citywide Housing Element 2021-2029 Project. Does your office require a response or is there another update of this document that your office requires a response?

Please contact me at your earliest convenience to let me know if you require a response for this document or if there is an update to it.

Best regards,  
Sunny

--

*Sunbula Azieh*  
Wastewater Engineering Services Division - LA Sanitation  
City of Los Angeles - Department of Public Works  
2714 Media Center Dr  
Los Angeles, CA 90065  
E-mail: [Sunbula.Azieh@lacity.org](mailto:Sunbula.Azieh@lacity.org)  
Tel: (323) 342-6231  
Fax: (323) 342-6210



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LOS ANGELES  
CITY PLANNING

**Cally Hardy** (she/her/hers)  
City Planning Associate  
**Los Angeles City Planning**

200 N. Spring St., Room 750  
Los Angeles, CA 90012  
Planning4LA.org  
(213) 978-1643





Housing Element &lt;housingelement@lacity.org&gt;

---

## LAUSD Comment Letter - Housing Element

4 messages

**Smith, Eimon** <cp-eimon.smith@lausd.net>

Fri, Feb 12, 2021 at 3:14 PM

To: "housingelement@lacity.org" &lt;housingelement@lacity.org&gt;

Cc: "Grazioli, Albert" &lt;albert.grazioli@lausd.net&gt;, "GODEK, GWENN" &lt;gwenn.godek@lausd.net&gt;

Hello,

Please see the attached comment letter regarding the City's Housing Element Update.

**Eimon Smith**

CEQA Project Manager | Contract Professional

LAUSD | Office of Environmental Health &amp; Safety

O: (213) 241-3417 | 21-225-02

C: (323) 787-2556

[E-mail](#) | [Website](#)*Please note my new email address is [cp-eimon.smith@lausd.net](mailto:cp-eimon.smith@lausd.net)**Preferred pronouns: She / her*

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**LAUSD\_CityHousingElementUpdate\_CommentLetter\_20210212.pdf**  
101K

**Housing Element** <housingelement@lacity.org>

Tue, Feb 16, 2021 at 10:29 AM

To: "Smith, Eimon" &lt;cp-eimon.smith@lausd.net&gt;

Cc: "Grazioli, Albert" &lt;albert.grazioli@lausd.net&gt;, "GODEK, GWENN" &lt;gwenn.godek@lausd.net&gt;, Matthew Glesne &lt;matthew.glesne@lacity.org&gt;, Blair Smith &lt;blair.smith@lacity.org&gt;, Ari Briski &lt;ari.briski@lacity.org&gt;

Thank you for your email. Your comments and/or attachments have been received and filed.

I am looping in others from the team, we will be in touch shortly regarding your request for a coordination meeting.

Regards,  
Cally  
[Quoted text hidden]

---

**Housing Element** <housingelement@lacity.org>

Tue, Feb 16, 2021 at 10:29 AM

To: Ari Briski <ari.briski@lacity.org>, Blair Smith <blair.smith@lacity.org>, Matthew Glesne <matthew.glesne@lacity.org>

FYI  
[Quoted text hidden]

---

 **LAUSD\_CityHousingElementUpdate\_CommentLetter\_20210212.pdf**  
101K

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**Smith, Eimon** <cp-eimon.smith@lausd.net>

Tue, Feb 16, 2021 at 11:27 AM

To: Housing Element <housingelement@lacity.org>

Cc: "Grazioli, Albert" <albert.grazioli@lausd.net>, "GODEK, GWENN" <gwenn.godek@lausd.net>, Matthew Glesne <matthew.glesne@lacity.org>, Blair Smith <blair.smith@lacity.org>, Ari Briski <ari.briski@lacity.org>

Thank you Cally. We look forward to setting a meeting to discuss our shared initiatives. Please feel free to reach out to me to coordinate a time and date for this discussion.

### Eimon Smith

CEQA Project Manager | Contract Professional  
LAUSD | Office of Environmental Health & Safety  
O: (213) 241-3417 | 21-225-02  
C: (323) 787-2556  
[E-mail](#) | [Website](#)

Please note my new email address is [cp-eimon.smith@lausd.net](mailto:cp-eimon.smith@lausd.net)  
Preferred pronouns: She / her



---

**From:** [cally.hardy@lacity.org](mailto:cally.hardy@lacity.org) <[cally.hardy@lacity.org](mailto:cally.hardy@lacity.org)> **On Behalf Of** Housing Element

**Sent:** Tuesday, February 16, 2021 10:29 AM

**To:** Smith, Eimon <[cp-eimon.smith@lausd.net](mailto:cp-eimon.smith@lausd.net)>

**Cc:** Grazioli, Albert <[albert.grazioli@lausd.net](mailto:albert.grazioli@lausd.net)>; GODEK, GWENN <[gwenn.godek@lausd.net](mailto:gwenn.godek@lausd.net)>; Matthew Glesne <[matthew.glesne@lacity.org](mailto:matthew.glesne@lacity.org)>; Blair Smith <[blair.smith@lacity.org](mailto:blair.smith@lacity.org)>; Ari Briski <[ari.briski@lacity.org](mailto:ari.briski@lacity.org)>

**Subject:** Re: LAUSD Comment Letter - Housing Element

**CAUTION: EXTERNAL EMAIL**

2/16/2021

City of Los Angeles Mail - LAUSD Comment Letter - Housing Element

[Quoted text hidden]

# Los Angeles Unified School District

## Office of Environmental Health and Safety

AUSTIN BEUTNER  
*Superintendent of Schools*

CARLOS A. TORRES  
*Director, Environmental Health and Safety*

JENNIFER FLORES  
*Deputy Director, Environmental Health and Safety*

February 12, 2021

**City of Los Angeles, Department of City Planning**

ATTN: Cally Hardy, City Planning Associate

200 N. Spring Street, Room 750

Los Angeles, CA 90012

*Submitted via: [housingelement@lacity.org](mailto:housingelement@lacity.org)*

PROJECT: Housing Element Update

CASE NUMBERS: CPC-2020-1365-GPA; ENV-2020-6762-EIR

This letter provides comments submitted on behalf of the Los Angeles Unified School District (LAUSD or District) regarding the City of Los Angeles' (City's) Housing Element Update (Project). The District supports the City's Housing Element goals to increase housing production and preservation, ensure neighborhood livability, prevent discrimination, and end homelessness.

The District has similar goals for housing production and development within the District's boundaries. To this extent, the District would like to coordinate with the City to discuss several considerations associated with the Housing Element and residential development within the City.

The City's goals regarding the recommended rezoning in the Housing Element is to limit the continued 'concentrations of poverty' in areas is consistent with the District's desire to provide residential developments for mixed income employees. Specifically, the District would like to maintain flexibility with the housing distribution and workforce requirements.

The District's Facilities Real Estate & Asset Development Department and Office of Environmental Health & Safety would like to engage the City's Executive Planning team in these conversations regarding the District's development within the City and other mutually beneficial initiatives.

Regards,



Eimon Smith  
LAUSD Office of Environmental Health and Safety  
CEQA Project Manager, Contract Professional

c: Al Grazioli, Director, LAUSD Facilities Real Estate & Asset Development  
Gwenn Godek, CEQA Advisor, Contract Professional, LAUSD Office of Environmental Health and Safety



## NATIVE AMERICAN HERITAGE COMMISSION

January 14, 2021

Cally Hardy  
City of Los Angeles  
200 North Spring Street, Room 750  
Los Angeles, CA 90012

CHAIRPERSON  
**Laura Miranda**  
Luiseño

VICE CHAIRPERSON  
**Reginald Pagaling**  
Chumash

SECRETARY  
**Merri Lopez-Keifer**  
Luiseño

PARLIAMENTARIAN  
**Russell Atebery**  
Karuk

COMMISSIONER  
**William Mungary**  
Paiute/White Mountain  
Apache

COMMISSIONER  
**Julie Tumamait-Stenslie**  
Chumash

COMMISSIONER  
[Vacant]

COMMISSIONER  
[Vacant]

COMMISSIONER  
[Vacant]

EXECUTIVE SECRETARY  
**Christina Snider**  
Pomo

**NAHC HEADQUARTERS**  
1550 Harbor Boulevard  
Suite 100  
West Sacramento,  
California 95691  
(916) 373-3710  
[nahc@nahc.ca.gov](mailto:nahc@nahc.ca.gov)  
[NAHC.ca.gov](http://NAHC.ca.gov)

**Re: 2021010130, Los Angeles Citywide Housing Element 2021-2029 Update and Safety Element Project, Los Angeles County**

Dear Ms. Hardy:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, § 15064.5 (b) (CEQA Guidelines §15064.5 (b))). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1))). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

**Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.**

## AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

- 1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:** Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

  - a.** A brief description of the project.
  - b.** The lead agency contact information.
  - c.** Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
  - d.** A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).
- 2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report:** A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).

  - a.** For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).
- 3. Mandatory Topics of Consultation If Requested by a Tribe:** The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

  - a.** Alternatives to the project.
  - b.** Recommended mitigation measures.
  - c.** Significant effects. (Pub. Resources Code §21080.3.2 (a)).
- 4. Discretionary Topics of Consultation:** The following topics are discretionary topics of consultation:

  - a.** Type of environmental review necessary.
  - b.** Significance of the tribal cultural resources.
  - c.** Significance of the project's impacts on tribal cultural resources.
  - d.** If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).
- 5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process:** With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).
- 6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document:** If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

  - a.** Whether the proposed project has a significant impact on an identified tribal cultural resource.
  - b.** Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

- 7. Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
- a.** The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
  - b.** A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).

**8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).

**9. Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).

**10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**

- a.** Avoidance and preservation of the resources in place, including, but not limited to:
  - i.** Planning and construction to avoid the resources and protect the cultural and natural context.
  - ii.** Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
- b.** Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
  - i.** Protecting the cultural character and integrity of the resource.
  - ii.** Protecting the traditional use of the resource.
  - iii.** Protecting the confidentiality of the resource.
- c.** Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
- d.** Protecting the resource. (Pub. Resource Code §21084.3 (b)).
- e.** Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
- f.** Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).

**11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:

- a.** The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
- b.** The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
- c.** The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).



The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: [http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation\\_CalEPAPDF.pdf](http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf)

## SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: [https://www.opr.ca.gov/docs/09\\_14\\_05\\_Updated\\_Guidelines\\_922.pdf](https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf).

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
  - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
  - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

## NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center ([http://ohp.parks.ca.gov/?page\\_id=1068](http://ohp.parks.ca.gov/?page_id=1068)) for an archaeological records search. The records search will determine:
  - a. If part or all of the APE has been previously surveyed for cultural resources.
  - b. If any known cultural resources have already been recorded on or adjacent to the APE.
  - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
  - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
  - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.

- b.** The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.
- 3.** Contact the NAHC for:
- a.** A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
  - b.** A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
- 4.** Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
- a.** Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, § 15064.5(f) (CEQA Guidelines § 15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
  - b.** Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
  - c.** Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code § 7050.5, Public Resources Code § 5097.98, and Cal. Code Regs., tit. 14, § 15064.5, subdivisions (d) and (e) (CEQA Guidelines § 15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address:  
[Andrew.Green@nahc.ca.gov](mailto:Andrew.Green@nahc.ca.gov).

Sincerely,



Andrew Green  
Cultural Resources Analyst

cc: State Clearinghouse



Housing Element <housingelement@lacity.org>

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## South Coast AQMD Staff NOP Comments for the Citywide Housing Element 2021-2029 Update and Safety Element Update

2 messages

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**Lijin Sun** <LSun@aqmd.gov>  
To: "housingelement@lacity.org" <housingelement@lacity.org>

Tue, Feb 9, 2021 at 7:35 AM

Dear Ms. Hardy,

Attached are South Coast AQMD staff's comments on the Notice of Preparation of a Draft Environmental Impact Report for the Citywide Housing Element 2021-2029 Update and Safety Element Update ([South Coast AQMD Control Number: LAC210121-02](#)). Please contact me if you have any questions regarding these comments.

Thank you,

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

South Coast Air Quality Management District


[21865 Copley Drive, Diamond Bar, CA 91765](#)

Direct: (909) 396-3308

Fax: (909) 396-3324

*\*Please note that the building is closed to the public.*

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 **LAC210121-02 NOP Citywide Housing Element 2021-2029 Update and Safety Element Update\_20210209.pdf**  
128K

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**Housing Element** <housingelement@lacity.org>  
To: Lijin Sun <LSun@aqmd.gov>

Tue, Feb 9, 2021 at 9:29 AM

Thank you for your email. Your comments and attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178  
(909) 396-2000 • [www.aqmd.gov](http://www.aqmd.gov)

SENT VIA E-MAIL:

[housingelement@lacity.org](mailto:housingelement@lacity.org)

Cally Hardy, City Planning Associate  
City of Los Angeles, Planning Department  
200 N. Spring Street, Room 750  
Los Angeles, California 90012

February 9, 2021

**Notice of Preparation of a Draft Environmental Impact Report for the  
Citywide Housing Element 2021-2029 Update and Safety Element Update  
(Case Number: CPC-2020-1365-GPA) (Proposed Project)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. Our comments are recommendations on the analysis of potential air quality impacts from the Proposed Project that should be included in the Draft Environmental Impact Report (EIR). Please send a copy of the Draft EIR upon its completion and public release directly to South Coast AQMD as copies of the Draft EIR submitted to the State Clearinghouse are not forwarded. **In addition, please send all appendices and technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all emission calculation spreadsheets, and air quality modeling and health risk assessment input and output files (not PDF files). Any delays in providing all supporting documentation for our review will require additional review time beyond the end of the comment period.**

### **CEQA Air Quality Analysis**

Staff recommends that the Lead Agency use South Coast AQMD's CEQA Air Quality Handbook and website<sup>1</sup> as guidance when preparing the air quality and greenhouse gas analyses. It is also recommended that the Lead Agency use the CalEEMod<sup>2</sup> land use emissions software, which can estimate pollutant emissions from typical land use development and is the only software model maintained by the California Air Pollution Control Officers Association.

South Coast AQMD has developed both regional and localized significance thresholds. South Coast AQMD staff recommends that the Lead Agency quantify criteria pollutant emissions and compare the emissions to South Coast AQMD's CEQA regional pollutant emissions significance thresholds<sup>3</sup> and localized significance thresholds (LSTs)<sup>4</sup> to determine the Proposed Project's air quality impacts. The localized analysis can be conducted by either using the LST screening tables or performing dispersion modeling.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips, and hauling trips). Operation-related air quality impacts may include, but are not limited to, emissions from

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<sup>1</sup> South Coast AQMD's CEQA Handbook and other resources for preparing air quality analyses can be found at: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>.

<sup>2</sup> CalEEMod is available free of charge at: [www.caleemod.com](http://www.caleemod.com).

<sup>3</sup> South Coast AQMD's CEQA regional pollutant emissions significance thresholds can be found at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>.

<sup>4</sup> South Coast AQMD's guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

stationary sources (e.g., boilers and air pollution control devices), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis. Furthermore, emissions from the overlapping construction and operational activities should be combined and compared to South Coast AQMD's regional air quality CEQA *operational* thresholds to determine the level of significance.

If the Proposed Project generates diesel emissions from long-term construction or attracts diesel-fueled vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment<sup>5</sup>.

The California Air Resources Board's (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective*<sup>6</sup> is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process with additional guidance on strategies to reduce air pollution exposure near high-volume roadways available in CARB's technical advisory<sup>7</sup>.

The South Coast AQMD's *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*<sup>8</sup> includes suggested policies that local governments can use in their General Plans or through local planning to prevent or reduce potential air pollution impacts and protect public health. It is recommended that the Lead Agency review this Guidance Document as a tool when making local planning and land use decisions.

### **Mitigation Measures**

In the event that the Proposed Project results in significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize these impacts. Any impacts resulting from mitigation measures must also be analyzed. Several resources to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project include South Coast AQMD's CEQA Air Quality Handbook<sup>1</sup>, South Coast AQMD's Mitigation Monitoring and Reporting Plan for the 2016 Air Quality Management Plan<sup>9</sup>, and Southern California Association of Government's Mitigation Monitoring and Reporting Plan for the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy<sup>10</sup>.

South Coast AQMD staff is available to work with the Lead Agency to ensure that air quality, greenhouse gas, and health risk impacts from the Proposed Project are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at [lsun@aqmd.gov](mailto:lsun@aqmd.gov).

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS

LAC210121-02 Control Number

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<sup>5</sup> South Coast AQMD's guidance for performing a mobile source health risk assessment can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>.

<sup>6</sup> CARB's *Air Quality and Land Use Handbook: A Community Health Perspective* can be found at: <http://www.arb.ca.gov/ch/handbook.pdf>.

<sup>7</sup> CARB's technical advisory can be found at: <https://www.arb.ca.gov/ch/landuse.htm>.

<sup>8</sup> South Coast AQMD. 2005. *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*. Available at: <http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf>.

<sup>9</sup> South Coast AQMD's 2016 Air Quality Management Plan can be found at: <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf> (starting on page 86).

<sup>10</sup> Southern California Association of Governments' 2020-2045 RTP/SCS can be found at: [https://www.connectsocial.org/Documents/PEIR/certified/Exhibit-A\\_ConnectSoCal\\_PEIR.pdf](https://www.connectsocial.org/Documents/PEIR/certified/Exhibit-A_ConnectSoCal_PEIR.pdf).

# Appendix B-2

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Organizations



Housing Element <housingelement@lacity.org>

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## Letter to DCP - concerns about housing element approach

4 messages

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**Anthony Dedousis** <anthony@abundanthousingla.org>

Fri, Feb 5, 2021 at 8:00 AM

To: housingelement@lacity.org, Cally Hardy <cally.hardy@lacity.org>

Cc: Matthew Glesne <matthew.glesne@lacity.org>, vince.bertoni@lacity.org, Leonora Camner <leonora@abundanthousingla.org>

Dear Cally,

I'm writing to [share a coalition letter to the Department of City Planning](#), regarding 14 community organizations' concerns about Planning's approach to the housing element, as detailed in [the initial study for the EIR](#).

Planning's analysis suggests that the City can achieve over 80% of its RHNA target with no significant zoning or policy changes, and that the remaining 20% can be accommodated via already-in-progress community plan updates and changes to the City's Density Bonus program. We think that the assumptions are incorrect, and that continuing down this path would fail to comply with AFFH requirements (since it would create little new housing in high-income, exclusionary areas, and perpetuate patterns of segregation).

We would appreciate the opportunity to discuss our concerns with you whenever you're available. I can be reached at 516-660-7402.

Please confirm receipt of this letter when you have an opportunity. Thanks very much for your help.

Regards,

Anthony

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### **Anthony Dedousis**

Director, Policy and Research

Abundant Housing LA

[515 S Flower Street, 18th Floor](#)

[Los Angeles, CA 90071](#)

516-660-7402

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**Housing Element** <housingelement@lacity.org>

Fri, Feb 5, 2021 at 9:53 AM

To: Anthony Dedousis <anthony@abundanthousingla.org>

Cc: Cally Hardy <cally.hardy@lacity.org>, Matthew Glesne <matthew.glesne@lacity.org>, Leonora Camner <leonora@abundanthousingla.org>

Hi Anthony,

Thank you, your comments and attachments have been received and filed.

Nick Burns had previously reached out and we set up a meeting with him on this coming Monday from 3-4 to discuss. Would it make sense for you to join that call?

Regards,

Cally

[Quoted text hidden]

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**Anthony Dedousis** <anthony@abundanthousingla.org>

Fri, Feb 5, 2021 at 11:15 AM

To: Housing Element <housingelement@lacity.org>

Cc: Cally Hardy <cally.hardy@lacity.org>, Matthew Glesne <matthew.glesne@lacity.org>, Leonora Camner <leonora@abundanthousingla.org>

Hi Cally,

Thanks very much - I'd be happy to join that meeting. Appreciate you looping me in.

Regards,

Anthony

[Quoted text hidden]

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**Cally Hardy** <cally.hardy@lacity.org>

Fri, Feb 5, 2021 at 11:44 AM

To: Anthony Dedousis <anthony@abundanthousingla.org>

Cc: Housing Element <housingelement@lacity.org>, Matthew Glesne <matthew.glesne@lacity.org>, Leonora Camner <leonora@abundanthousingla.org>

Great, I will add you to the calendar invite now.

Best,

Cally

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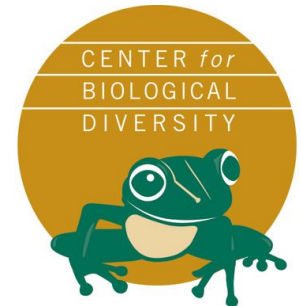
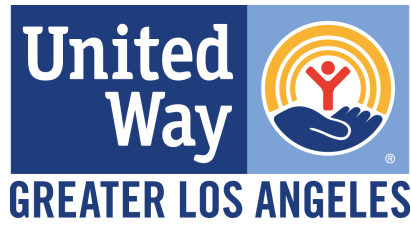


**Cally Hardy** (she/her/hers)  
City Planning Associate  
**Los Angeles City Planning**

200 N. Spring St., Room 750  
Los Angeles, CA 90012  
Planning4LA.org  
(213) 978-1643







February 4, 2021

Mr. Vince Bertoni  
Director of Planning  
Los Angeles Department of City Planning  
200 North Spring Street  
Los Angeles, CA 90012

Dear Mr. Bertoni,

Thank you for the opportunity to comment on the process of updating the housing element of Los Angeles' general plan. We are writing on behalf of a coalition of organizations representing the policy, academic, environmental, business, social justice, and affordable housing communities. We support efforts to expand the availability of housing at all levels of income, and ensure that cities meet their obligations to affirmatively further fair housing. **We are concerned that the current community planning and housing element update processes are not on track to achieve this goal.**

Exclusionary zoning and land use practices have led to an undersupply of affordable medium- and high-density housing near jobs and transit, and have perpetuated segregated living patterns and the exclusion of historically disadvantaged communities. The housing and homelessness crisis, together with this year's COVID-19 pandemic, severe wildfires, and civil unrest, illustrate the need for a totally new approach to solving our city and region's housing crisis.

For these reasons, we support a housing element update in Los Angeles that is equitable and balanced, promotes socioeconomic integration, and takes a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

Additionally, it is critical that housing element updates affirmatively further fair housing (AFFH), which is required by state law under AB 686 (2018). According to the State Department of Housing and Community Development (HCD), a housing element must "ensure that sites zoned to accommodate housing for lower-income households are not concentrated in lower resource areas and segregated concentrated areas of poverty, but rather dispersed throughout the community, including in areas with access to greater resources, amenities, and opportunity."<sup>1</sup> Cities should accommodate at least a pro-rata portion of the lower-income RHNA target in high-opportunity census tracts (e.g. if 30% of a jurisdiction's land area is located in high-opportunity tracts, then at least 30% of the lower-income RHNA should be allocated to such tracts.) This includes high-opportunity neighborhoods that have frequently used exclusionary land use rules to shut out lower-income households and affordable housing.

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<sup>1</sup> HCD, [AB 686 Summary of Requirements in Housing Element Law, April 2020](#), pg. 6

We have called for Planning to develop a distribution of the Regional Housing Needs Assessment (RHNA) target of 455,000 homes to each of Los Angeles' community plan areas (CPA) for purposes of the sites inventory. Each CPA's target should be based on a formula that includes objective, quantifiable criteria like housing costs, median income, access to transit, proximity to job centers, access to public resources (e.g. parks, schools), patterns of historical exclusion and segregation, and environmental quality.

Planning's methodology should also include CPA-level housing growth targets by income level. Los Angeles' target of 184,000 homes that are affordable to lower-income households must be distributed fairly across CPAs; all neighborhoods, particularly high-opportunity neighborhoods that have historically blocked new housing through exclusionary zoning, must accommodate more affordable housing.

This equitable distribution of housing growth would reduce traffic and carbon emissions, increase access to jobs and transit, open up exclusionary neighborhoods to Angelenos of all backgrounds, and foster economic recovery from the COVID-19 pandemic, while also ensuring that the City's housing element update complies with AB 686's requirement to affirmatively further fair housing. This would also align with [Council President Martinez's recent motion calling for "an equitable distribution of new housing around the city based on high quality jobs, transit, and historic housing production."](#)

**It is therefore disappointing that Planning does not intend to pursue the equitable distribution approach in the housing element update**, despite receiving significant feedback from many members of the Housing Element Task Force in support of this approach. Planning recently released [an Initial Study](#) for the housing element update which contains numerous inadequacies that merit serious concern. Planning's analysis suggests that the City can achieve over 80% of its RHNA target with no significant zoning or policy changes, and that the remaining 20% can be accommodated via already-in-progress community plan updates and changes to the City's Density Bonus program.

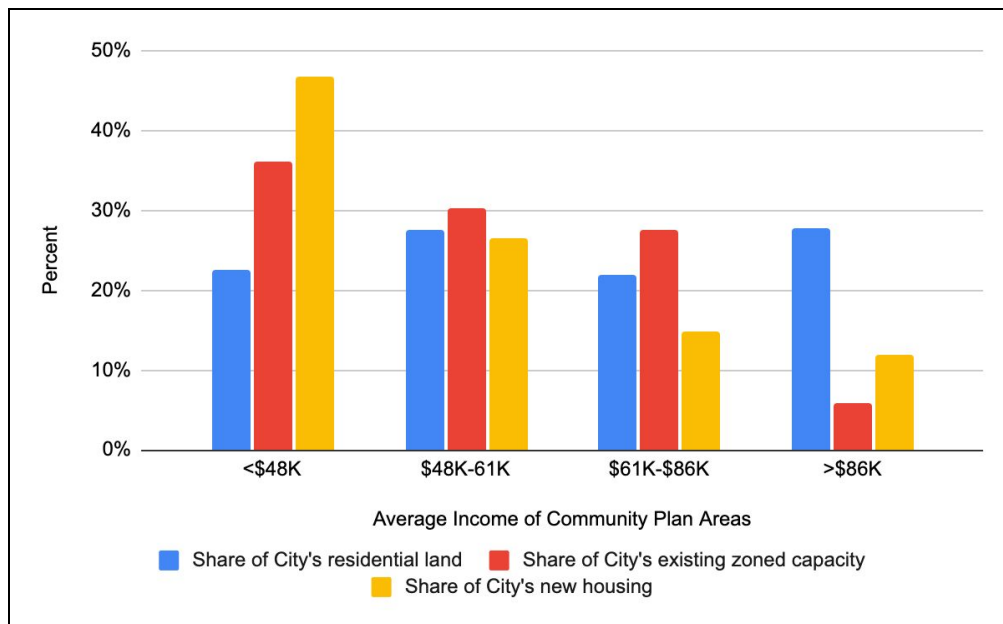
We believe that the facts do not support these conclusions. Additionally, this approach to the housing element update would perpetuate an unsatisfactory status quo, doing little to meaningfully address unaffordable housing costs, lengthy commutes, poor air quality, excessive water use, displacement of lower-income renters, and segregated neighborhoods. **We must not continue down this path.**

We wish to draw your attention to the following shortcomings of Planning's "status quo" proposal and analysis:

- **Planning's "status quo" proposal fails to affirmatively further fair housing.** By planning for most housing growth on parcels where multifamily development is already allowed, the City is steering housing opportunities away from the [75% of the City's residentially-zoned land that is restricted to single-family housing only](#). This perpetuates

historic patterns of segregation and exclusion, and continues to push housing opportunities for lower-income households towards lower-income neighborhoods.

- About one-quarter of the City’s residentially-zoned land is in CPAs where the median annual household income is below \$48,000. But 36% of the City’s zoned capacity is located in these low-income CPAs, helping to explain why 47% [of new housing built in Los Angeles between 2013 and 2019](#) was built in low-income CPAs. Just 12% of new housing was built in high-income CPAs (those with a median annual household income above \$86,000), despite these areas making up 28% of the City’s residentially-zoned land.<sup>2</sup>



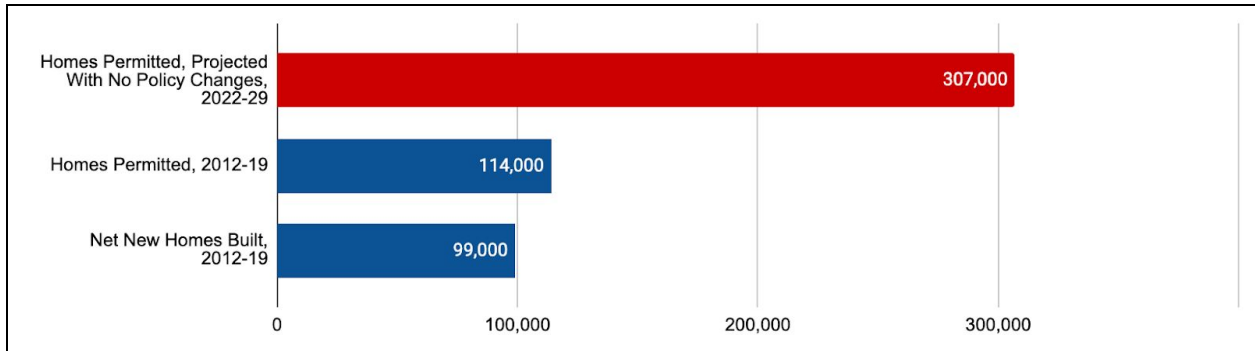
- Planning anticipates that under current zoning (including the nearly-completed Downtown, Hollywood, and Boyle Heights community plan updates), Los Angeles has a realistic development capacity to build 307,000 more homes by the end of the eight-year 6th cycle in 2029.<sup>3</sup> However, Los Angeles only permitted about 114,000 homes during the eight-year period ending in 2019,<sup>4</sup> leading to a net increase of 99,000 homes during that time.<sup>5</sup> Planning offers no convincing rationale for why they expect housing production to nearly triple without significant policy or zoning changes. Additionally, their scoping document fails to document how Planning staff arrived at their 307,000-home estimate, nor does it provide an estimate of likelihood of development, a critical factor in assessing realistic development capacity.

<sup>2</sup> Analysis of Dario Alvarez, Pacific Urbanism, and Professor Paavo Monkkonen, UCLA Luskin

<sup>3</sup> Initial Study, pg. 15

<sup>4</sup> Initial Study, pg. 15

<sup>5</sup> California Department of Finance, Report E-5, 2020



- Planning’s anticipated site inventory, where they expect the development of 307,000 more homes to occur, appears to contain a large number of parcels zoned for multifamily residential development. This suggests that a large number of existing rent-stabilized housing units would be redeveloped under Planning’s “status quo” approach, increasing lower-income renter households’ risk of displacement. **Planning should decline to include parcels containing RSO housing units in the site inventory, instead identifying additional areas for housing production via rezoning.**
- Since Planning has made overly optimistic assumptions regarding how much of the RHNA target can be achieved without zoning changes, Planning expects that only 93,000 homes need to be accommodated through rezoning and changes to the City’s Density Bonus program. Planning anticipates accommodating much of this 93,000-home gap through a series of community plan updates that are already in progress.<sup>6</sup> However, many draft community plan updates highlighted in the Initial Study, including updates for the Westside, Hollywood, Southwest Valley, Southeast Valley, and Purple Line Transit Neighborhood Plan, are unambitious and do little to create significant amounts of new housing capacity. This approach also allows high-resource neighborhoods whose community plan update processes have not yet started, like Brentwood-Pacific Palisades and Westwood, to avoid zoning reforms that are necessary to accommodate the City’s RHNA goal. This is unfair.
- The “status quo” approach does not reflect the input given by the Housing Element Task Force, a diverse group of community leaders, special needs service providers, affordable and market-rate housing developers, and other housing and community development professionals who represent a wide range of expertise. The Housing Element Task Force requested that the City:
  - “update the citywide growth strategy to ensure equity is a core part of future land use decisions,”
  - “develop citywide housing goals by Community Plan areas to ensure more equitable distribution of affordable housing,”
  - “strategically increase housing opportunities in lower density areas,”
  - “provide land use incentives/preferences in high resource areas for affordable housing developments,”

<sup>6</sup> Initial Study, pg. 19-20

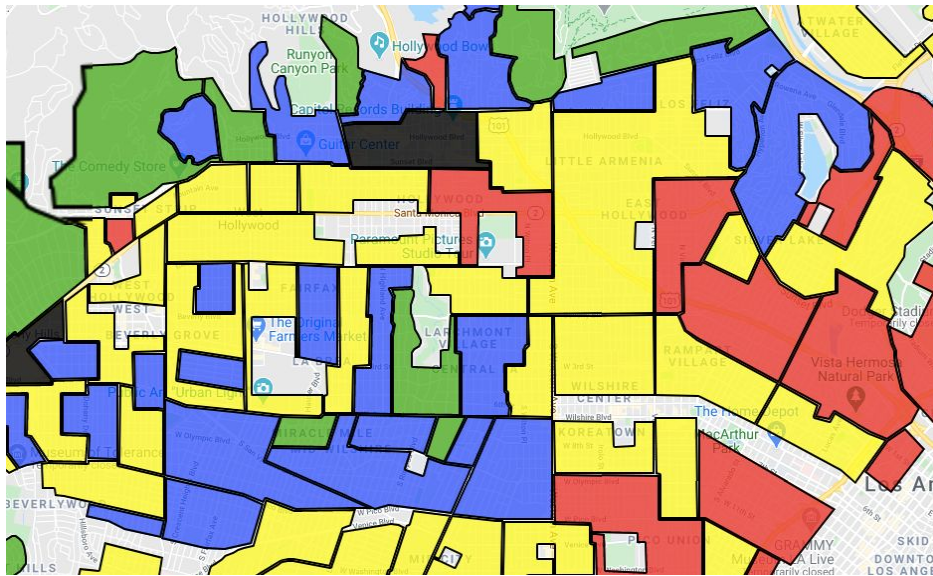
- “increase access to opportunities and proactively desegregate the City by planning for more affordable and mixed-income housing in high resource areas,”
- “facilitate missing middle housing options through the new zoning code.”
- The “status quo” plan is directly opposite to the goals developed on the Task Force because it perpetuates patterns of segregation and fails to meaningfully increase housing production in lower-density and higher-opportunity areas.

Finally, it is worth noting that the racist practice of redlining, which divided our city’s neighborhoods by race and income, strongly influenced zoning laws that remain on the books today, defining where affordable housing may and may not be built. On the maps below, you can see that single-family zoning today is frequently concentrated in areas that were labeled “desirable” (green and blue) in the 1930s, and that new apartment production is generally allowed only in areas that were labeled as “declining” or “hazardous” (yellow and red) when redlining was legal. Consequently, Planning’s proposed site inventory map appears to promote most housing growth in areas that were once labeled as “declining” or “hazardous”.

**Clearly, a “status quo” approach to the housing element that fails to undertake meaningful zoning reform would simply reinforce the barriers that redlining created in our communities decades ago.**

### Home Owners' Loan Corporation map of Los Angeles, 1930s

*“Desirable” areas in **green and blue**, “declining” or “hazardous” areas in **yellow and red***



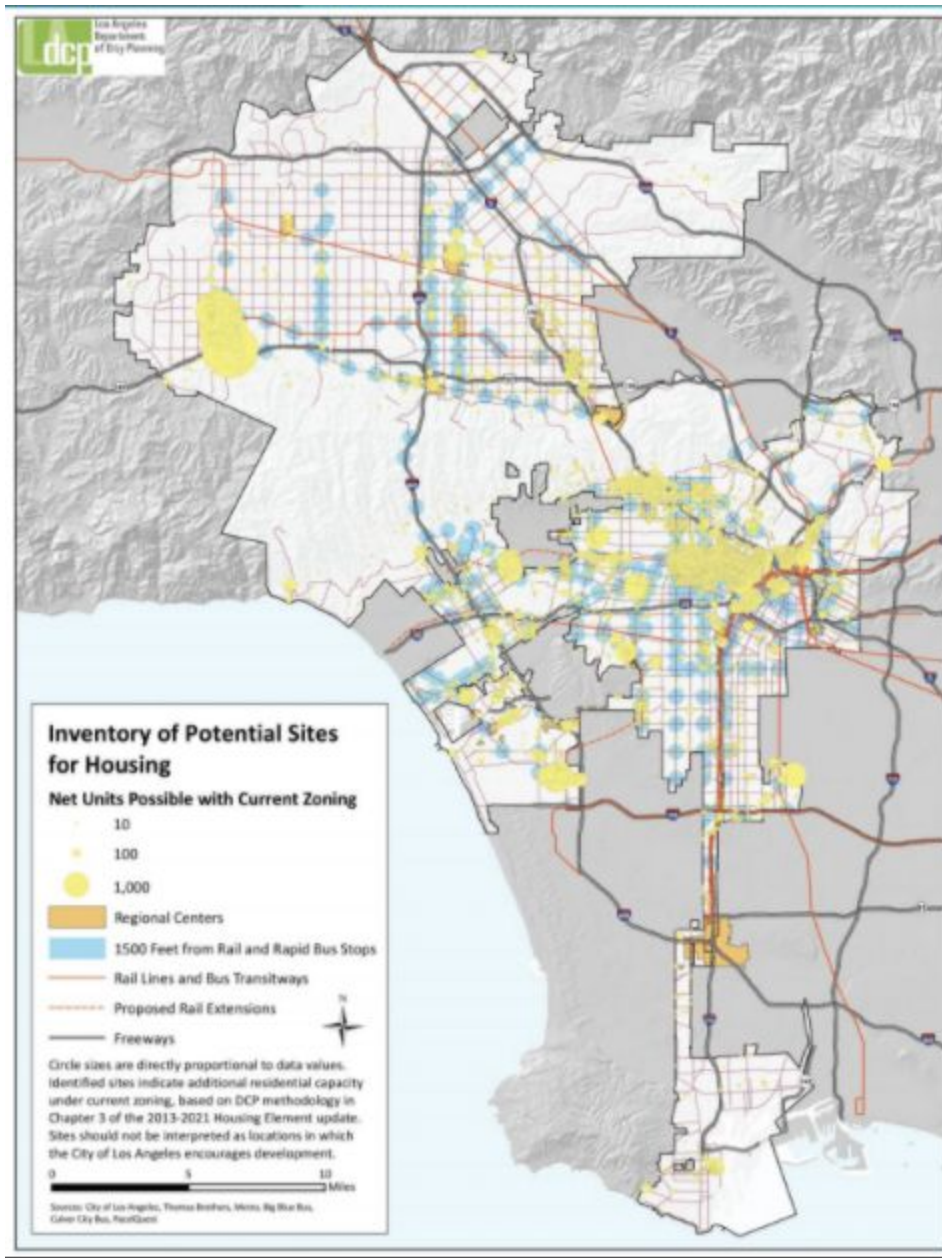
### Zoning map of Los Angeles, 2019

*Areas where apartments banned in **pink**; areas where apartments allowed in **blue**.*



## Inventory of Potential Sites for Housing

Los Angeles Department of City Planning, 2020



**For all these reasons, we strongly oppose Planning’s “status quo” approach to the housing element update.** Fortunately, there is still time to change course and create an equitable, transformative housing element.

While housing element updates are due to HCD by October 15, 2021, the City could request that HCD approve a housing element conditionally. This would give Planning additional time to make necessary revisions. Recently, HCD approved [San Diego’s housing element update on a conditional basis](#), giving San Diego an additional six months to “amend the element and



address requirements related to affirmatively furthering fair housing and making findings to demonstrate the likelihood of redevelopment on nonvacant sites.” There’s no reason why Los Angeles shouldn’t take advantage of the opportunity to get the housing element right, especially given that HCD is likely to scrutinize the same issues that we’ve identified above.

We request the opportunity to meet with you to discuss this matter, and we urge you to instruct the Department of City Planning to revise its approach to the housing element update. Thank you for your consideration.

Sincerely,

Leonora Camner  
Executive Director  
Abundant Housing LA

Anthony Dedousis  
Director of Policy and Research  
Abundant Housing LA

Marilu Guevara  
Executive Director  
League of Women Voters of Los Angeles

Chris Carson  
Advocacy Chair  
League of Women Voters, City of Los Angeles

Shane Phillips  
Project Manager, Housing Initiative  
UCLA Lewis Center

Brian Hanlon  
President and CEO  
California YIMBY

Stephen M. Albert, A.I.A.  
Housing Element Task Force Member  
The Albert Group

Paavo Monkkonen  
Associate Professor of Urban Planning and  
Public Policy  
UCLA Luskin School of Public Affairs

Joel John Roberts  
CEO  
PATH Ventures

Sahar Khundmiri  
Advocacy Manager  
Safe Place for Youth

Sonja Trauss  
President  
YIMBY Law

Dario Alvarez  
President  
Pacific Urbanism

A. Lenise Kouture  
CEO and President  
International Black Restaurant and  
Hospitality Association

Lauren Borchard and Mehmet Berker  
Founders  
Friends of the Purple Line

Bryn Lindblad  
Deputy Director  
Climate Resolve

J.P. Rose  
Staff Attorney  
Center for Biological Diversity

David Howden  
Director, Los Angeles  
Corporation for Supportive Housing

Lois Starr  
Acting Executive Director  
PATH Ventures

Louis Abramson, PhD  
Chair, Homelessness Committee  
Central Hollywood Neighborhood Council

Jason Riffe  
Director, Housing Initiatives  
United Way Greater Los Angeles



Housing Element <housingelement@lacity.org>

## Re: ACT-LA Letter re: Site Inventory for Housing Element

1 message

**Cally Hardy** <cally.hardy@lacity.org>

Mon, Feb 8, 2021 at 5:28 PM

To: Laura Raymond <lraymond@allianceforcommunitytransit.org>

Cc: Matthew Glesne <matthew.glesne@lacity.org>, Meredith Abood <maya.abood@lacity.org>, Claudia Monterrosa <claudia.monterrosa@lacity.org>, Jackie Cornejo <jackie.cornejo@lacity.org>, Blair Smith <blair.smith@lacity.org>, Greg Bonett <gbonett@publiccounsel.org>, Cynthia Strathmann <cstrathmann@saje.net>, Mahdi Manji <mmanji@innercitylaw.org>, Joe Donlin <jdonlin@saje.net>, Brady Collins <brady@kiwa.org>, Alexandra Suh <alexandra@kiwa.org>, Doug Smith <dsmith@publiccounsel.org>, Alfonso Directo <adirecto@allianceforcommunitytransit.org>, Housing Element <housingelement@lacity.org>

Laura:

Thank you for your email. Your comments have been received for the record.

Best,  
Cally

On Mon, Feb 8, 2021 at 12:23 PM Laura Raymond <lraymond@allianceforcommunitytransit.org> wrote:

Hi Matt, Cally, Maya, Jackie, Claudia and Blair,

ACT-LA has been working in coalition on recommendations for the Site Inventory in the 2021- 2029 Housing Element. Attached you will find our coalition's letter regarding these recommendations.

Please let us know if you have questions or concerns. This letter follows [our earlier letter on policies and programs](#).

Many thanks,

Laura

--

**Laura Raymond** (she/her)

Director | Alliance for Community Transit - Los Angeles

cell: (646) 344-0381

website: [www.allianceforcommunitytransit.org](http://www.allianceforcommunitytransit.org)



LOS ANGELES  
CITY PLANNING

**Cally Hardy** (she/her/hers)

City Planning Associate

**Los Angeles City Planning**

200 N. Spring St., Room 750

Los Angeles, CA 90012

Planning4LA.org

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2/16/2021

City of Los Angeles Mail - Re: ACT-LA Letter re: Site Inventory for Housing Element



February 8, 2021

**Re: Sites Inventory for the 2021-29 Housing Element**

Dear Los Angeles Department of City Planning and Housing and Community Investment Department:

To follow up on our letter submitted to you on October 20, 2020 regarding the Program and Policy Recommendations portion of the Housing Element<sup>1</sup>, the Alliance for Community Transit - Los Angeles (ACT-LA) offers these recommendations for the “sites inventory” section of the Housing Element.

As mentioned previously, ACT-LA is a city-wide coalition of 40 organizations working at the forefront of racial, environmental, and economic justice. Our coalition members include tenants’ rights organizations, affordable housing developers, workers’ centers, public interest law firms, and public health advocates, among others. Our mission is to uplift communities—through affordable housing opportunities, good jobs and access to high quality public transit—as the Southland transforms into a more sustainable region. Given our commitment to equity, we believe that low-income communities and communities of color must be centered in decisions that seek to transform our neighborhoods.

It is worth mentioning that since our last letter, the impact of COVID-19 on Angelenos has only worsened. The long-term impact on low-income communities and communities of color that have been hardest hit by both the virus and the related economic fallout cannot be overstated. Our city’s existing affordable housing and homelessness crises, particularly in low-income communities of color, will only be worsened by this public health pandemic.

Developing the Housing Element in the midst of this disaster demands that we take bold action to meet our region’s Regional Housing Needs Assessment (RHNA) numbers in a manner that addresses the lasting impacts of redlining, segregation, and gentrification. **The obligation to affirmatively further fair housing should be a core aim of the sites inventory - not an afterthought.** Site allocation should “serve the purpose of replacing segregated living patterns with truly integrated and balanced living patterns.” The housing element land inventory and identification of sites must be consistent with a jurisdiction’s duty to affirmatively further fair housing - which means “taking meaningful actions, in addition to combatting discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics.”

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<sup>1</sup><http://allianceforcommunitytransit.org/las-housing-element-update-could-be-transformative-were-calling-on-the-city-to-take-bold-action-to-improve-housing-affordability/>

The Los Angeles Department of City Planning (DCP) has a stated goal of furthering our fair housing obligations through the Housing Element update. However, the draft methodology discussed in the January site selection task force meeting suggests that the current approach to producing the site inventory will focus on existing capacity, and that only after all existing sites are identified will the result be considered from a perspective of affirmatively furthering fair housing. We believe this approach is backwards.

There are many things the city can do to more meaningfully address its obligation to affirmatively further fair housing through the housing element. The city should ensure that the housing element site inventory does not catalyze displacement of tenants, and that the inventory facilitates prioritization of public land for affordable housing. The city should also adopt complementary policies to ensure that adopting an appropriate site inventory does not have unintended consequences. These policies include a universal replacement requirement and a commitment to implementing any program to rezone in an equitable manner. All of this is necessary if the city's housing element is to truly create better access to housing opportunities and avoid contributing to displacement pressure in historically disinvested communities.

**a. Adopt a universal replacement requirement to protect rent-stabilized housing and housing occupied by, or affordable to, lower-income households.**

As a prerequisite to adopting the site inventory, the city should adopt a universal replacement requirement for all new projects that destroy existing rent stabilized housing or housing occupied by, or affordable to, lower-income households. The city currently has a patchwork of replacement requirements with significant gaps. A universal requirement will clarify the applicability of replacement obligations and remove incentives for developers to avoid value-capture programs where replacement requirements already exist. This policy is a necessary prerequisite to the sites inventory because, without it, the city will face a dilemma: on the one hand, by listing existing tenant-occupied housing on the inventory, it will protect those units by applying the replacement requirement in housing element law to these sites; on the other hand, listing these sites on the inventory could make them a target for redevelopment - creating a risk of displacement for the tenants and a loss of affordable housing for the city. Ultimately rent-stabilized buildings and affordable housing must not be destroyed during this push for increased housing capacity. As discussed below, a universal replacement requirement will allow the city to develop an inventory of sites that are truly appropriate for development - which should not include sites currently occupied by tenants.

**b. Ensure that the Housing Element Site Inventory does not catalyze displacement.**

The purpose of the site inventory is to identify sites that are suitable for development. Adding a site to the inventory triggers provisions under that Housing Accountability Act and other state laws that limit the city's ability to deny development projects on the site. It follows that the site inventory should only include sites that the city truly wants developed or redeveloped. The inventory should not include sites currently occupied by tenants, where redevelopment would mean displacement. Including these sites on the inventory puts a target on the backs of tenants and housing that is in dire short supply: naturally

occurring affordable housing. This cannot be the path we choose to meet our RHNA goals, especially during such a precarious time for LA's renters. The city should categorically exclude all sites currently occupied by tenants from the site inventory.

**c. Prioritize public land for affordable housing to help achieve RHNA targets.**

The sites inventory should acknowledge the importance of publicly-owned sites to achieving affordable housing targets. Given RHNA gaps have historically been most significant for affordable housing, the sites inventory should analyze and highlight the capacity for affordable housing on public land. Local and state policy encourages public land to be used first for affordable housing, so identifying development capacity on land owned by the city or other public entities can support the city's long-term planning and compliance with these policies.

**d. Commit to principles of equity that will guide any program to rezone.**

If the city's site inventory does not include adequate sites to meet the 6th cycle RHNA allocation, the city will be required to adopt a program to rezone to create adequate capacity. Any program to rezone should be guided by principles of equity. It should carefully avoid catalyzing displacement and focus on affirmatively furthering fair housing. From the outset, the city should commit to conducting any program to rezone in a manner that addresses exclusionary zoning, prioritizes production of affordable housing, and does not exacerbate displacement pressures in lower-income communities.

The Los Angeles Department of City Planning (DCP) has a stated goal of furthering our fair housing obligations through the Housing Element update. The site inventory process is a key manner in which to address exclusionary zoning that has long plagued LA, leading to segregation and racial inequities. If the site inventory reveals inadequate capacity to meet LA's RHNA obligation, any program to rezone should include value-capture mechanisms, anti-displacement protections, and focus on high resource, low density census tracts and avoid rezoning in census tracts that are vulnerable to displacement or sites currently occupied by tenants. Anything less will fail to address historic exclusionary zoning and risk displacing low-income communities.

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At its core, the State Housing Element Law should be understood as a tool to dismantle racial segregation and further fair housing. For the city's inventory of sites to effectively advance this goal, the methodology behind creating the inventory must reflect these goals from the outset - not as an afterthought. To do this the sites inventory, and any subsequent program to rezone, should be crafted to steer the bulk of new housing production towards high-income, low-density, historically exclusionary neighborhoods while preventing displacement in communities facing gentrification and avoiding redevelopment of sites occupied by tenants.

Thank you for the opportunity to weigh in on the site inventory. We look forward to reviewing a draft inventory of sites and expect to provide further comments at that time.

Sincerely,

ACT-LA





Housing Element &lt;housingelement@lacity.org&gt;

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**Fwd: BACH Letter re: Housing and Safety Elements, Case No. ENV-2020-6762-EIR, CPC-2020-1365-GPA**

1 message

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**Cally Hardy** <cally.hardy@lacity.org>  
To: Housing Element <housingelement@lacity.org>

Tue, Feb 16, 2021 at 11:11 AM

----- Forwarded message -----

From: **Brentwood Residents Coalition** <brc90049@aol.com>  
Date: Tue, Feb 16, 2021 at 12:51 AM  
Subject: BACH Letter re: Housing and Safety Elements, Case No. ENV-2020-6762-EIR, CPC-2020-1365-GPA  
To: cally.hardy@lacity.org <cally.hardy@lacity.org>, housing.element@lacity.org <housing.element@lacity.org>  
Cc: mike.bonin@lacity.org <mike.bonin@lacity.org>, len.nguyen@lacity.org <len.nguyen@lacity.org>, jason.p.douglas@lacity.org <jason.p.douglas@lacity.org>, durrah.wagner@lacity.org <durrah.wagner@lacity.org>

Dear Ms. Hardy:

Brentwood Alliance of Canyons and HillsideS (BACH) submits the attached comments in response to the Initial Study for the General Plan's Housing and Safety Elements update.

Please enter our letter into the record and add us to the notification list for all updates, meeting notices, hearings, etc.

Thank you for your attention to this matter.

Sincerely,

Wendy-Sue Rosen  
Brentwood Alliance of Canyons & HillsideS  
[rosenfree@aol.com](mailto:rosenfree@aol.com)

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LOS ANGELES  
CITY PLANNING

**Cally Hardy** (she/her/hers)  
City Planning Associate  
**Los Angeles City Planning**  
200 N. Spring St., Room 750  
Los Angeles, CA 90012  
[Planning4LA.org](http://Planning4LA.org)  
(213) 978-1643



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 **BACH Comments on Housing & Safety Elements 2-15-2021.pdf**  
448K



February 15, 2021

Attention: Cally Hardy, City Planning Associate  
Department of City Planning  
200 North Spring Street, Room 750  
Los Angeles, CA 90012  
VIA E-MAIL  
housing.element@lacity.org

Re: BACH Scoping Comments for Update of General Plan's Housing and Safety Elements  
Case No. ENV-2020-6762-EIR, CPC-2020-1365-GPA

Dear Ms. Hardy:

This letter concerning the scope of the EIR for the proposed update to the Los Angeles General Plan's Housing and Safety Elements is submitted by the Brentwood Alliance of Canyons and HillSides (BACH). BACH is an alliance of homeowner and residential associations located in the Santa Monica Mountains founded in response to the growing threat of climate change and the unprecedented risk of wildfire from continued encroachment of development into the fragile Santa Monica Mountains ecosystem.<sup>1</sup>

### **The IS Ignores the Significant Impacts of Development in the Wildland-Urban Interface**

The City's initial study (IS) for the project, identifying areas to be addressed in an environmental impact report (EIR) pursuant to the California Environmental Quality Act (CEQA), raises many serious questions and causes for concern, which require extensive environmental analysis, as explained below.

The update of the Housing and Safety Elements gives the City the opportunity to align the City's Housing and Safety Elements with State policy for the reduction of greenhouse gases, and protection of biodiversity, wildlife and wildlife corridors. The update is also essential to the balancing of the City's goal of meeting existing and projected housing needs with the emerging consensus that further development of hillside areas within the Wildland-Urban Interface/Intermix (WUI)<sup>2</sup> creates unacceptable safety risks related to wildfires. Environmental experts warn that governmental entities like the City can no longer downplay the impacts of hillside development on

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<sup>1</sup> BACH members, including Bel Air Skycrest Property Owners' Association, Brentwood Hills Homeowners Association, Brentwood Residents Coalition and Mountaingate Open Space Maintenance Association, support and promote sustainable communities, habitat, wildlife connectivity, open space, trails, public safety, and the urban tree canopy.

<sup>2</sup> The WUI is defined as a zone adjacent to or of transition between wildlands and human development and its associated infrastructure designated Very High Fire Hazard Severity Zones, defined as areas in which severe wildfire hazards are increasingly likely due to flammable native and non-native wildland vegetation, hazardous weather patterns, steep topography, and human intrusion.

climate change, the on-going risk of drought and wildfires, and the resulting adverse impacts on public safety, wildlife, and biodiversity.

BACH is particularly concerned that the IS fails to address the impact of hillside development in areas designated by the State as Very High Fire Hazard Severity Zones (VHFHSZ)<sup>3</sup> in a comprehensive and substantive way. The initial study states that updating the Housing Element will have a less than significant impact in the Wildfire analysis category—thereby failing to recognize or even consider that development in hillside areas poses significantly increased wildfire risks. Indeed, the IS itself rebuts the notion that wildfire impacts are insignificant by stating that several recent state laws will likely require updates to some aspects of the General Plan, such as the Safety Element, but not the Housing Element.<sup>4</sup> But the Housing Element covers the City’s hillside areas, where future development creates (at the very least) significant wildfire-related impacts subject to updated CEQA Guidelines analyses. Among other things, these will require that the City consider restrictions on hillside development due to enhanced wildfire risk, as well as consideration and analysis of new CEQA Guidelines environmental impacts. (IS, p. 141.)

There is no justification for the conclusion that development in fire-prone hillside areas does not present significant wildfire risks. The only basis for that conclusion in the IS amounts to nothing more than wishful thinking based on factually-unsupported speculation that future hillside development will be de minimis:

- “Because the Housing Element Update would generally direct development away from the hillside areas with fire hazards and new development would be required to comply with fire safety provisions established by the Los Angeles Fire Code (2017), future development under the Housing Element Update would not pose a substantial risk to people or structures due to wildland fires. Impacts would be less than significant.” (IS, p. 144.)
- “such development is not likely or anticipated on a level that would significantly conflict with an adopted emergency response plan or emergency evacuation plan.” (IS, p. 142.)

The failure to consider future development is especially problematic because California faces the dangerous new reality of a year-round fire “season” and environmental conditions that make the consequences of wildfires greater than ever before. Over the past year, California has experienced the largest and most destructive wildfire season recorded in its modern history with more than 4

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<sup>3</sup> VHFHSZ is a state law designation requiring mapping of severe wildfire hazards based on “fuel loading, slope, fire weather, and other relevant factors including areas where Santa Ana winds have been identified by CAL FIRE as a major cause of wildfire spread.”

<sup>4</sup> As stated in the Initial Study, “Several recent state laws require the City to make updates to other sections of the General Plan alongside the update to the Housing Element. These laws place a particular emphasis on the Safety Element, with an expanded focus on planning for flooding, wildfires, and climate change impacts.”

million acres burned.<sup>5</sup> That is why experts warn that California's building codes<sup>6</sup> are not keeping up with the severe, wind-driven wildfires that are becoming the norm.<sup>7</sup>

The vague and unsupported statements in the IS do not constitute substantial evidence to support the IS's conclusion that there are not potentially significant impacts in the Wildfire analysis category.

The IS's failure to recognize the significant impacts of further development in hillside areas is contrary to the Governor's fire policy goals and climate change mandates. In response to the State's devastating wildfires over the last few years, the Governor's office released a report recommending local governments deprioritize new development in areas of the most extreme fire risk.<sup>8</sup>

The research report, "Rapid growth of the U.S. wildland-urban interface raises wildfire risk,"<sup>9</sup> found that when houses are built near natural vegetation types, they pose two problems related to wildfires. First, there will be more wildfires due to human ignitions. Second, the wildfires that do occur will pose a greater risk to lives and homes and will be more difficult to fight.

Underscoring this reality is evidence from recent fires, such as the Woolsey Fire, demonstrating that traditional fire-fighting methods are no longer effective. Fuel breaks, 12-lane freeways and bodies of water no longer stop wind-driven wildfires.<sup>10</sup> It is now clear that destructive wildfires create their own weather systems with the potential to devastate thousands of acres of land, wreaking havoc on anything in their paths.<sup>11</sup> Consequently, governmental entities must rethink whether new development should be allowed in fire-prone areas and if so, where and with what mitigation measures. Updating the City's Housing and Safety Elements thereby requires full environmental review of wildfire-related risks and impacts if any development may be allowed in fire-prone hillside areas.

Wildfire risks posed by development in hillside areas was emphasized in a January 2019 letter to the Governor from five leading environmental organizations, including the Sierra Club, Center for

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<sup>5</sup> Alex Wigglesworth and Joseph Serna, California fire season shatters record with more than 4 million acres burned, LA Times, Oct. 4, 2020, available at: <https://www.latimes.com/california/story/2020-10-04/california-fire-season-record-4-million-acres-burned>.

<sup>6</sup> Emily Guerin, Fire-Resistant Is Not Fire-Proof, California Homeowners Discover, NPR Weekend Edition Sunday, Dec. 9, 2018, available at: <https://www.npr.org/2018/12/09/673890767/fire-resistant-is-not-fire-proof-california-homeowners-discover>.

<sup>7</sup> See CAL FIRE chart at: [https://www.fire.ca.gov/media/4jandlhh/top20\\_acres.pdf](https://www.fire.ca.gov/media/4jandlhh/top20_acres.pdf).

<sup>8</sup> See *Wildfires and Climate Change: California's Energy Future*, A Report from Governor Newsom's Strike Force, April 12, 2019, available at: <https://www.gov.ca.gov/wp-content/uploads/2019/04/Wildfires-and-Climate-Change-California%E2%80%99s-Energy-Future.pdf>.

<sup>9</sup> See Radeloff, Helmers, Kramer, et al., *Rapid Growth of the U.S. wildland-urban interface raises wildfire risk*, Proceedings of the National Academy of Sciences of the United States of America, March 27, 2018, available at: <https://www.pnas.org/content/115/13/3314>.

<sup>10</sup> Bettina Boxall, California is spending \$32 million on a fire prevention strategy that doesn't work in high winds, LA Times, Sept. 11, 2019, available at: <https://www.latimes.com/projects/wildfire-california-fuel-breaks-newsom-paradise/>.

<sup>11</sup> Amanda Schmidt, How destructive wildfires create their own weather, AccuWeather, available at: <https://www.accuweather.com/en/weather-news/how-destructive-wildfires-create-their-own-weather/346337>.

Biological Diversity, John Muir Project, California Chaparral Institute and the Leonardo DiCaprio Foundation. The letter states: “To stop the destruction of our communities by wildfire we must focus on strategies that will work in our rapidly changing environment: **reduce the flammability of existing communities and prevent new ones from being built in very high fire hazard severity zones.**”<sup>12</sup>

Similarly, leading fire research scientist Alexandra Syphard worries that the current focus on fuel reduction gives “people a false sense of security.” While fuel reduction is essential to partially offset the risks created by *existing* development in the hillsides, new development exacerbates wildfire risks far beyond the reach of fuel-modification mitigation measures. She warns that to stem the escalating loss of life and property, the state needs to curb development in high fire-hazard zones, help homeowners ember-proof their houses and do a better job of enforcing defensible space regulations.<sup>13</sup>

To save lives and property the City should therefore incorporate expert recommendations in the updated Housing and Safety Elements to (1) institute home-hardening policies to reduce the flammability of existing communities, and (2) prohibit new development in Very High Fire Hazard Severity Zones.

### **CEQA Guidance**

In updating the Housing and Safety Elements, the City must review Wildfire impacts under the revised CEQA Guidelines, which now requires analysis of a project’s environmental impacts based on location in a wildfire hazard area. California courts recognize that where projects may exacerbate existing environmental conditions or hazards “an evaluation of how future residents or users could be affected by exacerbated conditions” is required. (*California Building Industry Assn. v. Bay Area Air Quality Management Dist.* (2015) 62 Cal.4th 369.) The CEQA Guidelines have therefore been updated to require an analysis of a project’s wildfire impacts for projects “in or near state responsibility areas or lands classified as very high fire hazard severity zones” to determine whether the project would:

- Substantially impair adopted emergency response or evacuation plans,
- Exacerbate wildfire risks due to slope, prevailing winds, or other factors and expose project occupants to pollutant concentrations from a wildfire or uncontrollable spread of wildfire,
- Require installation/maintenance of wildfire associated infrastructure (roads, fire breaks, water resources, power lines, other utilities) that may exacerbate fire risks or result in environmental impacts, or
- Expose people or structures to significant post-fire risks, such as downslope or downstream flooding/landslides, slope instability, drainage changes.

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<sup>12</sup> Joint letter from environmental groups to Governor Newsom, Jan. 11, 2019, available at: [https://www.sierraclub.org/sites/www.sierraclub.org/files/sce/sierra-club-california/PDFs/GovNewsom\\_Wildfires\\_2019.pdf](https://www.sierraclub.org/sites/www.sierraclub.org/files/sce/sierra-club-california/PDFs/GovNewsom_Wildfires_2019.pdf).

<sup>13</sup> Bettina Boxall, California is spending \$32 million on a fire prevention strategy that doesn’t work in high winds, LA Times, Sept. 11, 2019, available at: <https://www.latimes.com/projects/wildfire-california-fuel-breaks-newsom-paradise/>.

Based on the revised Guidelines, the City *must* include a comprehensive analysis of the potentially significant impacts of allowing development in VHFHSZ areas when updating the Housing and Safety Elements.

The risk that new development in fire-prone hillside areas will have additional environmental impacts is further supported by evidence that is now widely available. Numerous studies show that human ignition sources are the number one cause of wildfires in our hillsides. Lead author and U.S. Geological Survey wildfire expert Jon Keeley's "study shows human interaction with the landscape, no matter the climate, is causing most fires."<sup>14</sup> In fact, 95% of fires are caused by human-ignition sources.<sup>15</sup> According to the IS, the Housing Element will increase the number of units developed around the city, including in Open Space, fire-prone hillsides in the wildland-urban interface/intermix and other vulnerable areas. If additional housing units, commercial and/or multi-use development populates our very high fire hazard severity zones the City will experience more frequent and intense wildfire damage and destruction.

Evacuation routes become a major concern when considering building in fire-prone areas. Many of our hillside roads are substandard with limited ingress and egress making it difficult for those escaping a wildfire event to get out, and emergency vehicles that fight fires to get in concurrently.<sup>16</sup> Councilmember Bonin underscored this concern in his September 22, 2020 motion asking for a report on the capacity, safety, and viability of existing and potential evacuation routes in VHFHSZs, to identify the policies and development standards, including land use and building restrictions, necessary to support these evacuation routes and for the City Planning Commission to submit its report after reviewing the update to the Safety Element of the General Plan.<sup>17</sup>

Despite the mountains of available evidence to the contrary, the IS only briefly speculates that "the Housing Element Update would generally direct development away from the hillside areas with fire hazards" (IS, p. 144) and "such development is not likely or anticipated on a level that would significantly conflict with an adopted emergency response plan or emergency evacuation plan." (IS, p. 142.) This speculation does not resolve the revised Guideline impact analysis questions and cannot substitute for a proper review and analysis. The IS's conclusion that there will be no significant impacts in the Wildfire analysis category is not supported by substantial evidence.

The IS also fails to recognize that development in VHFHSZs implicates global warming concerns. The Los Angeles Green New Deal states: "We have to confront the greatest threat to our physical security and our health – a war on our shores with rising tides, and in our mountains with burning forests. Our fight is to protect our families, and our city, from the impacts of climate change."

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<sup>14</sup> Michael Bastasch, Study: Humans, Not Global Warming, Sparked Almost All Of California's Wildfires, Climate Change Dispatch, Aug. 13, 2018, available at: <https://climatechangedispatch.com/study-humans-not-global-warming-sparked-almost-all-of-californias-wildfires>.

<sup>15</sup> Joseph Serna, Rong-Gong Lin II and James F. Peltz, How do wildfires start and spread?, LA Times, Oct. 29, 2019, available at: <https://www.latimes.com/california/story/2019-10-29/how-do-wildfires-start>.

<sup>16</sup> Evan Wyloge, How we analyzed California's wildfire evacuation routes, AP News, April 27, 2019, available at <https://apnews.com/article/6f621c1c54734d0b95d374556c2cf5c0>.

<sup>17</sup> See Council Motion 20-1213 (Bonin), available at: <https://cityclerk.lacity.org/lacityclerkconnect/index.cfm?fa=ccfi.viewrecord&cfnumber=20-1213>.

Consequently, the Housing and Safety Elements must consider where housing can be built and where it cannot be built without adversely impacting global warming and wildfire risks. If we continue to build in the WUI, the City will be complicit in the loss of lives, habitat, wildlife and property from wildfires, and contribute to the billions of dollars incurred from these losses.

A coalition of dozens of leading international environmental and scientific groups developed the science-based 30x30 global target years ago as an interim step to safeguarding half of the planet in its natural state, to counter climate change, and to end our worsening biodiversity crisis. Reaching that goal means more neighborhood green space and more wilderness. Consistent with the 30x30 policy, Governor Newsom has ordered state agencies to conserve 30% of state land and coastal water by no later than 2030.<sup>18</sup>

But the IS ignores the 30x30 recommendations. The IS indicates that the update may allow rezoning and provide development incentives in existing low-density residential zones to create opportunities for missing middle housing typologies. (IS, p. 19.) It appears that this would apply to fire-prone hillside areas. But development in such hillside areas directly conflicts with the State and City's climate goals, increases the risk of wildfires, and gobbles up the very open space necessary to sustain biodiversity and allow wildlife and wildlife corridors and habitat to flourish.

Question: Please specify whether the update would allow rezoning and provide development incentives in fire-prone hillsides areas?

Request: Please provide a map of the areas being considered for rezoning.

Request: Please provide a wildfire study analyzing the significant impacts of developing in VHFHSZ.

Request: Please analyze and provide a study of the impacts of adding 419,261 to 429,261 units in areas with special environmental considerations, such as areas located near Open Space, Hillside areas, Very High Fire Hazard Severity Zones, or Coastal Zones?

According to the Floodplain Management Plan, climate change is already impacting water resources. Resource managers have observed the following impacts:

- Historical hydrologic patterns can no longer be solely relied upon to forecast the water future;
- Precipitation and runoff patterns are changing, increasing the uncertainty for water supply and quality, flood management and ecosystem functions;
- Extreme climatic events will become more frequent, necessitating improvement in flood protection, drought preparedness and emergency response.

Question: How will the City mitigate the above impacts as it plans to add over 400,000 units?

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<sup>18</sup> Andrew Sheeler, Nearly a third of California land must be conserved under new order signed by Gavin Newsom, Sacramento Bee, Oct. 7, 2020, available at: <https://www.sacbee.com/news/politics-government/capitol-alert/article246289850.html>.

According to the California Emergency Management Agency's *California Adaptation Planning Guide*, the most likely climate change impacts in the South Coast climate impact region, which includes Los Angeles, are as follows (Cal EMA, 2012):

- Increased temperatures
- Reduced overall precipitation
- Sea level rise
- Reduced tourism
- Reduced water supply
- Wildfire risk
- Public health (heat and air quality)
- Coastal erosion

The EIR must include consideration of these potentially significant environmental impacts in the appropriate analysis categories.

The following reports should be considered during the update of the Housing and Safety Elements and throughout the environmental review process for those elements of the General Plan. Please note and discuss conflicts between the Housing and Safety Elements and these policies, goals, and any planned actions detailed within the reports.

### ***1. L.A.'s Green New Deal***

Los Angeles' Green New Deal is based on the City's commitment to the Paris Agreement and charts a course for the City's specific emission reduction targets. It calls for cutting greenhouse gas emissions (GHGs) to 50% below 1990 levels by 2025; 73% below 1990 levels by 2035; and becoming carbon neutral by 2050.

Yet, according to the IS, project development would generate GHG emissions during construction through the use of petroleum-fueled construction equipment and worker vehicle trips to and from construction sites. Once completed, new development will generate new GHG emissions through the use of electricity and natural gas, vehicle trips of occupants, waste generation, water use, and wastewater generation. Although project development would be required to implement RCM-GHG-1 through RCM-GHG-5, GHG emissions generated under the proposed project could potentially have a significant impact on the environment. As such, potential GHG emissions generated by project development, and the consistency of project development with applicable plans, policies, or regulations aimed at reducing such GHG emissions, will be further analyzed in an EIR. (IS, p. 80.)

Question: How does the City plan to offset the above-referenced GHG emissions?

Question: How will the City ensure implementation of the Green Building Code, CALGreen, Construction Waste, and Renewable Portfolio Standard?

Request: Please analyze conflicts between goals set out in the Housing Element with the City's existing goals to reduce greenhouse gas emissions, and how these goals do or do not comply with California Governor Gavin Newsom's 30x30 mandate to conserve 30% of California's land and coastal waters by 2030.



Request: Please provide a map of where the Housing Element's more than 400,000 units will be built and designate on the map areas that are either "state responsibility areas" or lands classified as "very high fire hazard severity zones."

Request: Please provide a comprehensive analysis of how the addition of over 400,000 units will impact climate change.

## ***2. Local Hazard Mitigation Plan***

The Hazard Mitigation Plan (HMP) rightly asserts that wildfire is determined by climate variability, local topography, and human intervention. Climate change has the potential to affect multiple elements of the wildfire system: fire behavior, ignitions, fire management, and vegetation fuels. Hot dry spells create the highest fire risk. Increased temperatures may intensify wildfire danger by warming and drying out vegetation. Climate change may increase winds that spread fires. Faster fires are harder to contain, and thus are more likely to expand into residential neighborhoods.

The HMP outlines secondary impacts of wildfires. The Housing and Safety Elements must analyze each of these impacts. (See City of Los Angeles 2018 Local Hazard Mitigation Plan, p. 13-11.) According to the HMP, environmental impacts from wildfires can be severe. (City of Los Angeles 2018 Local Hazard Mitigation Plan, p. 13-13, listing severe impacts due to wildfire.)

Question: How will the update of the Housing and Safety Elements incorporate these findings and what standard of practice will be implemented to mitigate potentially severe wildfire impacts (for example, more high frequency flood events)?

Question: Will the City coordinate more frequent model calibration and the development of new forecast-based tools?

Request: Please provide mapping of both potential landslide and flooding areas particularly where property could be and is located.

## ***3. Resilient Los Angeles***

Resilient Los Angeles is a plan that includes strategies to help fortify our infrastructure, protect our economy, and make our city safer against sudden and unexpected events—from earthquakes to flooding—and address our underlying chronic stresses, such as economic security, climate change, and aging infrastructure.

This plan outlines educational efforts to reduce fire risk and how to respond when a fire or mudslide does occur to help communities stay safe and ensure that firefighters can focus resources on preventing loss of lives and damage to property. Increasing community-level knowledge around wildfire and mudslide risk will help build capacity within neighborhoods to protect against and be prepared for these events, including proactive risk reduction, evacuation, response, and recovery actions.

Question: How will the update of the Housing and Safety Element incorporate the goals and actions outlined in the Resilient LA report?

#### 4. *The California Climate Adaptation Planning Guide*

The State’s Climate Adoption Planning Guide outlines the climate change impact concerns for the South Coast climate impact region, which includes Los Angeles. The EIR should consider and analyze conflicts between the Housing and Safety Elements and the Climate Adaptation Planning Guide.

#### 5. *Review of California Wildfire Evacuation From 2017-2019*

The report Review of California Wildfire Evacuation From 2017-2019, revealed that in most cases, “local agencies and resources were overwhelmed by the speed and scale of the fires.” The report documented 11 wildfires focusing on the evacuation process. The report concluded that few agencies have the public resources to adequately and swiftly evacuate all populations in danger.

The report also found that areas containing difficult roads faced challenges in evacuating, and neighborhoods with single exits and roads with debris were difficult to evacuate, often leading to severe congestion.

The 11 case studies also revealed several strong similarities related to: human involvement in starting and spreading the fires; windy and dry conditions that exacerbated fire spread; varied and usually ineffective communication methods; considerable congestion due to personal vehicles; rapid filling of shelters; and a lack of formalized re-entry plans.

The chart below highlights similarities in the 11 fires reviewed in the study.

**Table 4: Key Similarities Across All Major 2017 to 2019 California Wildfires**

	Key Similarities Across Wildfires
<b>Cause</b>	Humans, either directly or indirectly, were involved in the fires’ ignition and spread.
<b>Fire Behavior</b>	High levels of dry vegetation and high winds exacerbated the spread of fires.
<b>Communication</b>	Jurisdictions had a variety of communication options they could employ, but not all were selected for each wildfire, leading to communication challenges.
<b>Evacuation</b>	Areas with single road entry, windy roads, or debris-blocked roads were difficult to evacuate. Most people evacuated via personal vehicle, and most evacuees experienced significant congestion. Local transportation agencies assisted (or were willing to assist) in most evacuations.
<b>Sheltering</b>	The ARC and local organizations were instrumental in providing aid via shelters. Shelters filled quickly with evacuees.
<b>Reentry</b>	Residents were offered resources for reentry from a variety of organizations (e.g., public agencies, private organizations), but formalized plans were lacking.

As reported in the Associated Press,<sup>19</sup> USA Today-California Network analysis of California communities and evacuation routes shows that some areas in the state are far outside the norm when it comes to the number of lanes of roadway available for the size of the population. Among the worst are Pacific Palisades, Eagle Rock and Highland Park.

Question: How does the EIR mitigate evacuation concerns in areas with substandard roadways?

Question: Will the City be utilizing an evacuation study to determine road capacity prior to allowing any additional density in the VHFHSZ?

Question: Given that experts and the above study clearly illustrate the difficulties with evacuation in hillside areas with substandard roadways, how can the City justify continuing to build in VHFHSZs?

## ***6. 2020 Los Angeles Biodiversity Report***

The recently released 2020 Los Angeles Biodiversity Report<sup>20</sup> is intended to assist the City reach the goal of no net biodiversity loss as set forth in Mayor Garcetti's Green New Deal plan. It sets forth guidelines for City Planning Staff identifying various Resource and Conservation goals and objectives, including, but not limited to maintaining, preserving, and protecting natural plant and wildlife habitat diversity, wildlife corridors, and linkages. The guidelines recognize the threat of urbanization as it encroaches on these unique and sensitive habitats such as the Santa Monica Mountains. The report also points out that cities are changing rapidly, yet they are just beginning to address climate change and urban ecology in a substantive way.

Question: How will these goals and policies be enforced when over the next 8 years there is a goal of building over 400,000 units with the option to rezone potentially environmental sensitive areas?

Question: Does the update of the Housing Element include implementation of the Biodiversity Report to help meet the goals of the Green New Deal? And, if so, how?

The IS states that “it is possible that individual project development sites are also identified in any area where the zoning permits residential uses or as part of the Rezoning Program, including lower density residential sites in the vicinity of native habitats or candidates, sensitive, or special status species.” (IS, p. 52.)

According to the “L.A. City Biodiversity Index,”<sup>21</sup> Los Angeles lies within a designated “global biodiversity hotspot,” one of only 36 in the world. This designation means that biodiversity is both highly concentrated and highly threatened in LA. Cities in biodiversity hotspots often have high numbers of legally protected species, but also high rates of extirpation. The Index has more than 37

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<sup>19</sup> Evan Wyloge, How we analyzed California’s wildfire evacuation routes, AP News, April 27, 2019, available at: <https://apnews.com/article/6f621c1c54734d0b95d374556c2cf5c0>.

<sup>20</sup> See <http://www.lacitysan.org/cs/groups/public/documents/document/y250/mduy/~edisp/cnt052553.pdf>.

<sup>21</sup> See [https://www.lacitysan.org/san/faces/home/portal/s-lsh-es/s-lsh-es-si/s-lsh-es-si-bd?\\_afLoop=2119574357889247&\\_afWindowMode=0&\\_afWindowId=null&\\_adf.ctrl-state=13azogixdr\\_1](https://www.lacitysan.org/san/faces/home/portal/s-lsh-es/s-lsh-es-si/s-lsh-es-si-bd?_afLoop=2119574357889247&_afWindowMode=0&_afWindowId=null&_adf.ctrl-state=13azogixdr_1).

plant and animal species listed as threatened or endangered, and an unknown number of species that have been extirpated within its boundary.

Request: The EIR must consider wildlife corridors when analyzing biological resources. New development in the hillsides could also have a significant impact on vegetation and trees that support nesting birds. According to the IS, “Such disturbance could constitute a violation of the CFGC and/or MBTA. (IS, p. 53.)

Question: How does the City plan to mitigate the impact of construction on nesting birds?

Question: What mitigations, if any, will prevent hundreds of trees from being destroyed during construction, over and beyond LA’s “Tree Replacement In Lieu” fee option?

### ***7. Floodplain Management Plan (Agency Submittal Draft 2020)***

According to the 2020 Floodplain Management Plan, much of the flood risk in the City of Los Angeles associated with urban drainage is not mapped, and therefore it should be assumed that adding more housing units without adequate drainage (especially in the hillsides) will cause increased flooding. As the Plan states, “Any overstatement of flood risk in areas that are subject to urban flooding may represent a portion of the risk not accounted for due to the lack of mapping of that risk.” (Floodplain Management Plan, p. 7-41.) Yet, the IS concludes that project development would not be anticipated to substantially alter drainage patterns. Consequently, the proposed project would not alter the drainage pattern of the City to an extent that would result in substantial erosion, siltation, or flooding on- or off-site. (IS, p. 94.)

Request: Please provide a mapping of urban drainage prior to adding more housing in urban and low-density areas.

The IS also concludes that while most project development would not be anticipated to substantially alter drainage patterns, the project could result in hillside development with the potential to redirect or impede flood flows. (IS, p. 96.)

Question: How will the City mitigate the potential impacts of any future development that would redirect or impede flood flows?

The Floodplain Management Plan considers the implications of climate change and warns that future flooding behavior cannot be judged on past behavior if climate conditions are changing and if broad precipitation patterns change over time. (Floodplain Management Plan p. 10-2.)

Question: What measures is the City taking to address the increasing risk of flooding? How does it plan to integrate the information into the update of the Housing and Safety Elements? The EIR should consider and analyze all plans intended to mitigate flood risk.

\* \* \* \* \*

In sum, state law mandates that the City update both the General Plan’s Housing *and* Safety Elements to account for potentially significant wildfire risks created by new development in fire-prone hillside areas, particularly within those areas designated by the State as VHFHSZs. In so

doing, the City must incorporate the goals, objectives and policies of the Local Hazard Mitigation Program to protect communities from unreasonable risks associated with geologic hazards, flooding, and wildland and urban fires.

More specifically, the City must (1) implement goals, objectives and policies to harden *existing* structures within VHFHSZs and (2) prohibit new development in VHFHSZs. But if the City nevertheless fails to prohibit new development in VHFHSZs, it must at the very least require *evacuation studies* and *roadway capacity analyses* before any new development is approved to ensure any new development within a VHFHSZ will not impair concurrent emergency access—both ingress for firefighters and egress for evacuating residents.

Sincerely,

Brentwood Alliance of Canyons and Hillside:

Bel Air Skycrest Property Owners' Association

*Lais Becker*, Community Liaison

Brentwood Hills Homeowners Association

*Eric Edmunds*, President

Brentwood Residents Coalition

*Wendy-Sue Rosen*, President

Mountaingate Open Space Maintenance Association

*Stephen Drimmer*, President

cc: Councilmember Mike Bonin



Housing Element <housingelement@lacity.org>

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## Extension of Deadline for Housing Element Update

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**Bisnoff Email** <bisnoff@gmail.com>

Tue, Jan 19, 2021 at 10:01 AM

To: Housing Element <housingelement@lacity.org>

Cc: Chris Spitz <ppfriends3@hotmail.com>

Dear Cally,

Due to the time crunch the City Planning Department placed on the Berggruen Project Scoping EIR comment period, the Brentwood Community Council is asking for an extension of 14 days to submit a response to the Housing Element EIR.

Will planning be able to extend the deadline?

Many thanks

Michelle

**Michelle A. Bisnoff**

**Chair, Brentwood Community Council**

**Commissioner, City of Los Angeles Innovation and Performance Commission & Chair, Fund Committee**

**Board Member, County of Los Angeles Animal Care Foundation**

*Disclaimer and Privacy Statement: While I am member of the Brentwood Community Council, the foregoing may not represent the ratified position or views of the BCC.*



Housing Element &lt;housingelement@lacity.org&gt;

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## Extension of Deadline for Housing Element Update

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**Bisnoff Email** <bisnoff@gmail.com>

Tue, Jan 19, 2021 at 4:20 PM

To: Housing Element &lt;housingelement@lacity.org&gt;

Dear Cally,

On Page 27 of the initial study for the Housing Element update, you did not select wildfire as a potential environmental impact.

Given 75% of our community is located in a Very High Fire Hazard Severity Zone, how was this determined?

We see in the current Housing Elements that Planning foolishly selected parcels for upzoning in area that burned to the ground in the Getty Fire.

Are we expected to advocate with regard to fire zones - it seems a forgone conclusion it is not safe to upzone in those locations?

Thank you

Michelle Bisnoff

*Michelle A. Bisnoff**Chair, Brentwood Community Council**Commissioner, City of Los Angeles Innovation and Performance Commission & Chair, Fund Committee**Board Member, Los Angeles County Animal Care Foundation*

*Disclaimer and Privacy Statement: While I am member of the Brentwood Community Council, the foregoing may not represent the ratified position or views of the BCC.*

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Housing Element <housingelement@lacity.org>

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## Extension of Deadline for Housing Element Update

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**Housing Element** <housingelement@lacity.org>  
To: Bisnoff Email <bisnoff@gmail.com>

Thu, Jan 28, 2021 at 4:21 PM

Michelle:

Thank you for your email. Unfortunately, due to the mandatory state deadline for adoption of the Housing Element Update, we are unable to extend the scoping period. Please know that there will be additional opportunity for public review and comment on the Draft EIR when it is released later this Spring.

Additionally, regarding your question about wildfire impacts, you may find the analysis supporting that determination starting on page 141 of the Initial Study. The purpose of this comment period is to provide an opportunity for you to comment on what analysis you believe should be included in the EIR, including alternatives and mitigation. These comments may include any basis you have that you believe impacts scoped out should be included in the EIR. We will be sure to note your comment and take it into account as we conduct the environmental analysis.

Regards,  
The Housing Element Team  
[Quoted text hidden]





Housing Element &lt;housingelement@lacity.org&gt;

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## Extension of Deadline for Housing Element Update

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**Bisnoff Email** <bisnoff@gmail.com>

Tue, Feb 2, 2021 at 1:17 PM

To: Housing Element &lt;housingelement@lacity.org&gt;

3 things are clear:

1. The Industrial Element has not been reviewed since 2009. We now have extensive mass transit running through those areas. It is not reasonable to fail to include industrial areas near transit for housing. You want to unsafely cram everything into OUR community because some idiot decided to claim our entire fire zone in a "High Opportunity Area".
2. The Housing Element recklessly maps Very High Fire Zone Areas as "High Opportunity Areas". Why would you ever include State designated Very High Fire Hazard Severity Zones as "high opportunity" - nothing in your analysis explains this at all.
3. The Advisory Board for the Housing Element with 29 members and only 1 of them supports Single Family Zoning - and you're going to give a fair review of our neighborhood?

This process is specifically meant to harm our community. It will end in litigation due to the absolute disregard for safety, including traffic intersections with a D or F rating where there is no room to improve the road, but people on your "Advisory Board" are targeting us for 50,000 units of increased density.

When people sue the City, we can pull out this email so it's clear the Housing Element team was aware of our concerns long before we filed our public EIR comments.

*Michelle A. Bisnoff*

*Chair, Brentwood Community Council*

*Commissioner, City of Los Angeles Innovation and Performance Commission & Chair, Fund Committee*

*Board Member, Los Angeles County Animal Care Foundation*

*Disclaimer and Privacy Statement: While I am member of the Brentwood Community Council, the foregoing may not represent the ratified position or views of the BCC.*

[Quoted text hidden]



Housing Element <housingelement@lacity.org>

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## Extension of Deadline for Housing Element Update

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**Housing Element** <housingelement@lacity.org>  
To: Bisnoff Email <bisnoff@gmail.com>

Thu, Feb 4, 2021 at 2:03 PM

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team  
[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

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## Housing Element Public Comment on EIR

2 messages

**Bisnoff Email** <bisnoff@gmail.com>

Thu, Feb 11, 2021 at 11:06 AM

To: Housing Element &lt;housingelement@lacity.org&gt;

Dear Cally,  
Please find the attached public comment on behalf of the Brentwood Community Council regarding the City's Housing Element EIR.

Respectfully submitted,  
Michelle Bisnoff

*Michelle A. Bisnoff*

*Chair, Brentwood Community Council*

*Commissioner, City of Los Angeles Innovation and Performance Commission & Chair, Fund Committee*

*Board Member, Los Angeles County Animal Care Foundation*

*Disclaimer and Privacy Statement: While I am member of the Brentwood Community Council, the foregoing may not represent the ratified position or views of the BCC.*

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**BCC EIR Scoping Letter - Housing Element FINAL Draft Feb 8 2021\_Executed.pdf**

334K

**Housing Element** <housingelement@lacity.org>

Tue, Feb 16, 2021 at 10:20 AM

To: Bisnoff Email &lt;bisnoff@gmail.com&gt;

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



February 8, 2021

VIA E-MAIL

housing.element@lacity.org

Attention: Cally Hardy, City Planning Associate

Department of City Planning

200 North Spring Street, Room 750

Los Angeles, CA 90012

**Re: Case No. ENV-2020-6762-EIR  
CPC-2020-1365-GPA**

Dear Ms Hardy:

On behalf of the Brentwood Community Council (BCC), I wish to submit the following comments concerning the scope of the EIR for the above Citywide Housing Element 2021-2029 Update and Safety Element Update. The Brentwood Community Council represents 14 resident organizations, 3 business districts and 35,000 residents of Los Angeles and we believe every effort has been made to obtain the widest possible scope of opinion. These comments are based upon a review by the BCC Land Use Committee (Committee), other interested members of the BCC and members of the Brentwood community of: (i) the Notice of Preparation of a Draft Environmental Impact Report and Notice of Scoping Meeting dated January 13, 2021 (NOP), (ii) the January 2021 Initial Study (IS) prepared by Rincon Consultants Inc. and (iii) the January 28, 2021 Scoping Meeting conducted by the Planning Department.

The NOP requests identification of environmental issues, environmental impacts, and information that should be considered and analyzed in the EIR. The NOP defines the “Housing Element Update” or “Project” to include the Housing Element 2021-2029 Update, the Safety Element Update, and rezone program, and those terms are used herein to include those items. The IS lays out the potential environmental impacts to be studied in the EIR. The purpose of this letter is to respond to the NOP and the IS, and help assure that the Project EIR adequately analyzes and assesses potential significant environmental impacts.

Throughout the Initial Study there are references to a proposed draft Housing Element (DHE), but to our knowledge no such draft has been made available to the public for review, and the IS does not include the DHE. The complete absence of any proposed text of the DHE makes meaningful public comment on potentially significant environmental impacts extraordinarily difficult at this stage. Without an opportunity to review the DHE it is not possible for the Committee to ascertain potential significant impacts that may arise from the adoption of the DHE. The California Office of Planning and Research properly recognizes an EIR for a general plan element update will not provide meaningful information if it is prepared before actual policy language is developed. Accordingly, the EIR scoping process should not be concluded until the public is afforded a reasonable

opportunity to review the DHE and provide additional comments concerning the scope of the EIR, as any environmental review of the Project without a DHE will render the process incomplete and inadequate. A revised NOP should be circulated that provides for another round of NOP responses by community members and responsive agencies once Project documents have been updated to include the DHE to ensure that a thorough environmental analysis may be performed.<sup>1</sup>

The BCC agrees that each potentially significant environmental impact identified in the IS must be thoroughly and objectively analyzed and evaluated so that the City and the public will have an honest assessment of the Project's impact upon the environment. The BCC further believes that the Project EIR should specifically analyze and evaluate the topics specified below relative to each subject matter proposed for it to cover.

**Land Use and Planning** - The IS concludes the Project could potentially cause a significant environmental impact due to a conflict with other land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. The Project EIR should specifically address the potential impact upon Very High Fire Hazard Severity Zones (VHFHSZ) if any such zones are included within the Rezoning Program for possible increased housing density. Finally, the EIR should separately analyze the cumulative effects of the Project's land use designations, policies and programs on the environment for each of the City's 35 separate community plan areas.

**Housing and Population.** The IS indicates that the Project goal is to relieve overcrowding and the existing housing cost burden, and to provide housing for the existing unsheltered and unhoused population. The IS also recognizes that the Project could nevertheless result in additional population growth beyond what is forecast in the Regional Housing Needs Assessment (RHNA) for the City, potentially creating a significant environmental impact. The Project EIR should analyze the potential impact of such additional population growth for each community plan area within the Rezoning Program.

The NOP states the objectives of the Project solely from the supply side of the housing issue. The Project EIR should analyze whether existing and projected vacancies with respect to all types and economic levels of housing in the City will materially impact the need for additional housing capacity for any income level. The Project EIR should analyze whether housing for very low and low income groups can be achieved without funding subsidies and whether establishing new multi-family housing zones alone will increase available affordable housing.

The Project EIR should study the potential environmental impacts of maintaining current single-unit R1 zoning throughout the City and whether the Rezoning Program can be accomplished without changing existing R1 zones. Under what environmental criteria should single-unit R1 zones and zoning be maintained? If single-unit R1 zoning is maintained, what are the environmental impacts to those areas that will be zoned to accommodate new housing under the city's RHNA allocations?

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<sup>1</sup> The State's General Plan Guidelines (Guidelines) states "CEQA should not just be a post hoc rationalization of decisions that have already been made. (*Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal. 3d 376, 395)"; and "an EIR will not provide meaningful information if it is prepared before actual policy language is developed." The Guidelines also state: "the lead agency cannot defer its analysis of any significant effect of the general plan to later-tiered EIRs (*Stanislaus Natural Heritage Project v. County of Stanislaus* (1996) 48 Cal.App.4th 182)."

The IS states the City's target additional zoning capacity for housing units will be 501,642, including a 25% buffer above the RHNA allocation for very low and low income housing. The HE EIR will only study the potential environmental impacts of an additional zoning capacity of 429,000 housing units. The HE EIR should study potential environmental impacts of an increased zoning capacity of 501.642 housing units. **Services.**

**Fire Services.** The IS indicates the Project could have a potentially significant impact by placing an unanticipated burden on fire protection services or affecting response times or service ratios. The EIR should specifically address the potential impact of the Project upon providing fire protection services in VHFHSZs, particularly if the increase in housing unit outpaces the ability of the City to expand fire services.

**Police Services.** The IS indicates the Project could have a potentially significant impact by placing an unanticipated burden on police services or affecting response times or service ratios. The police budget is presently being cut, leaving the community with under-funded first responders. The EIR should specifically address the potential impact of the Project upon providing police services should the increase in housing units outpace the ability of the City to expand police services.

**Schools.** As part of the EIR's study of the impact of increased density on public schools, how will the EIR address specific differences within the City - for example, schools with enrollment under capacity vs. schools at, or, over-enrolled?

**Parks.** As part of the EIR's study of the impact of increased density the public parks and recreation system, how will the EIR address specific differences within the City – by each of the different Community Plan areas.

**Transportation.** The Initial Study identifies a number of circumstances where the Project could result in increased trips compared to existing conditions. Trips generated as a result of project development have the potential to impact intersection and roadway segments throughout the City. The proposed project may also conflict with applicable plans and policies addressing the circulation system.

- The EIR should analyze the potential traffic impacts the Project will have upon areas within the Rezoning Program.
- In connection with studying impacts on transportation, the EIR should identify and address neighborhoods that are already unable to accommodate their existing density, i.e., with already established unacceptable service level burdens on roadways.
- The EIR should examine and address the utilization of unused or underused properties near new major transit options located in light industrial or industrial zones as an alternative or supplement to utilizing existing residential communities for increased housing.?
- The EIR should analyze the environmental impact of increased residential density on transportation level of service within a 0.5 mile radius of such impacted roads and intersections.
- The EIR should study and analyze the impact of converting industrial zoning to mixed use/residential within 0.50 mile of mass transit..

**Wildfire.** The IS concludes that the Project will have less than significant impacts upon risks associated with wildfires. This conclusion is based upon an expectation that the Project would not introduce any features, policies or procedures that would in any way encourage housing development in VHFHSZ. Unless the Project will exempt all VHFHSZ from the Rezoning Program, the EIR should analyze the impact it will have upon risks associated with wildfires. Accordingly, the EIR should analyze and describe whether the Project should specifically state that no “Opportunity Sites” are appropriate in VHFHSZ, and study wildfire in the event the Project does not state that no “Opportunity Sites” are appropriate in VHFHSZs. To the extent the Housing Element seeks to adopt any increased housing in VHFHSZ, the EIR should analyze whether that can that be accomplished without a potentially significant negative safety and/or environmental impact?

In studying wildfire, we believe the EIR should address the following topics that relate to wildfires:

- The Los Angeles City Council adopted by unanimous vote on November 10, 2020 (Council File No. 20-1213) a Motion relative to evacuation routes in VHFHSZ and directed the Department of City Planning, that requires, among other things:
  - To report back on the capacity, safety, and viability of existing and potential evacuation routes in Very High Fire Hazard Severity Zones and identify the policies and development standards, including land use and building restrictions, necessary to support those evacuation routes;
  - To amend the General Plan by incorporating the Local Hazard Mitigation Plan and Office of Planning and Research’s “Fire Hazard Planning” provisions into the Safety Element concurrent with the ongoing update of the Housing Element; and
  - To address State and Local goals for climate adaptation and resilience.

The EIR should analyze, incorporate, and implement the above-described report of DCP, the above-described amendments, and the above-described goals for climate adaptation and resilience, into the Project. The EIR should describe why the EIR is not defective and deficient if it proceeds without full compliance with the City Council Motion.

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- The EIR should explain whether the goals, policies, programs, and procedures of the Project that promote housing development will prevail over the concerns for the safety of lives and property in VHFHSZ.

- The EIR should explain the apparent inconsistencies between State laws and the General Plan with respect to housing objectives and the safety of lives and property in VHFHSZ.<sup>2</sup>
- The statements on pages 141 – 144 of the IS imply that up zoning and the allocation of Sites Inventory will not occur in HFHSZ. However, the following appears on page 142 of the IS:

“While the geographic distribution of development would largely occur in areas of the City that are currently zoned for multi-family residential and commercial development in proximity to transit, it is possible that individual project development sites are identified in any area where the zoning permits residential uses or as part of the Rezoning Program, including lower density residential sites in the vicinity of a Very High Fire Hazard Severity Zones (VHFHSZ). However, such development is not likely or anticipated on a level that would significantly conflict with an adopted emergency response plan or emergency evacuation plan.”

Moreover, the IS indicates on page 25 that VHFHSZs are possible locations for additional units. If any development or up zoning is a possibility in HFHSZ, the EIR should analyze the type and amount of development that might significantly impact the human lives, property, or biological resources in all such VHFHSZs.

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- The EIR should analyze how, when wildfires do occur, any densification in VHFHSZ poses a greater risk to lives and homes and results in traffic congested evacuation routes and the fire being more difficult to combat.
- The NOP states that the City anticipates amending the Safety Element to “address recently adopted State requirements pertaining to climate change and wildfire.” The EIR should address what the environmental impact of climate change will be on the ability to meet RHNA targets?
- The EIR should study and analyze how, and to what extent, any proposed rezoning will impact fire and evacuation risks in VHFHSZs. The EIR should explain the statement on page 147 of the Initial Study “In general, impacts to human beings are associated with air quality, hazards and hazardous materials, and noise” in view of the obvious impacts on the lives, property, and biological resources (plants and animals) from housing densification in VHFHSZ.
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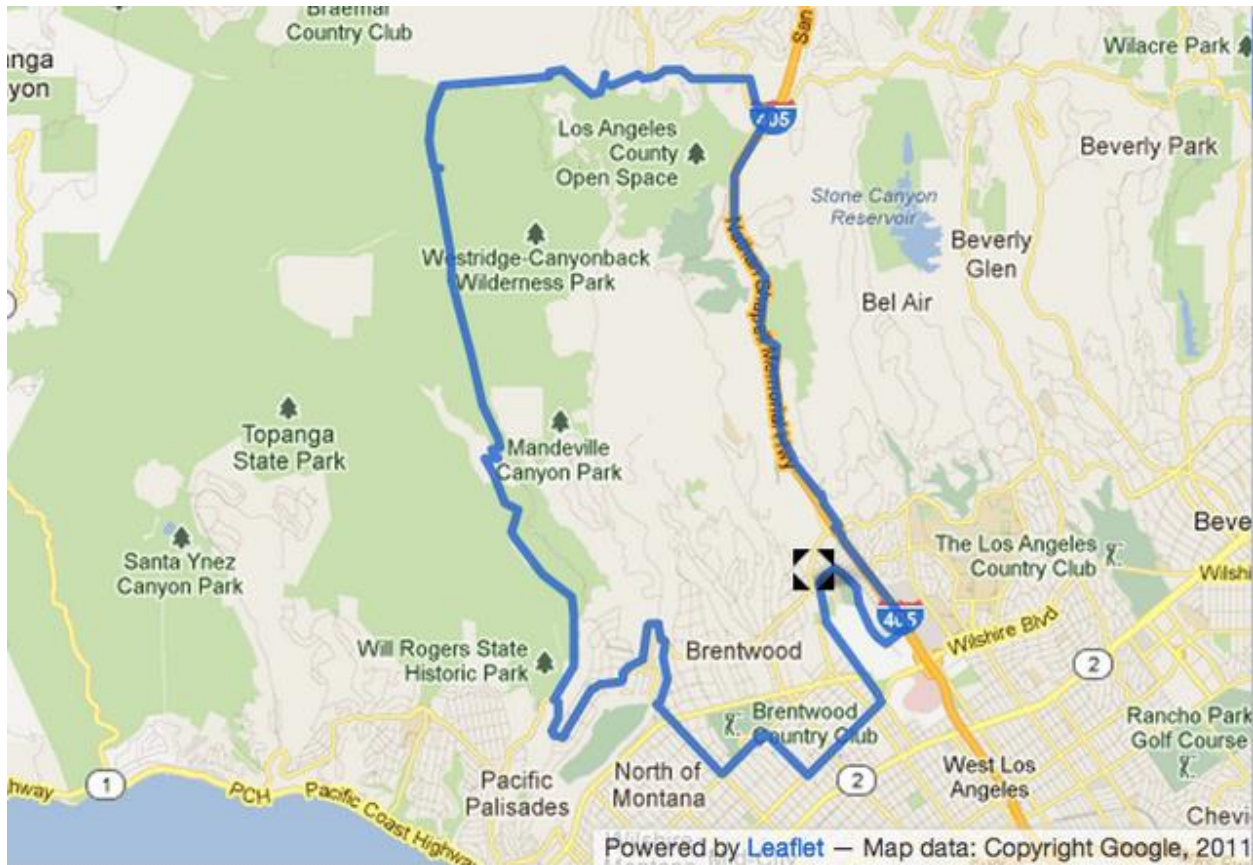
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**Hazards and Hazardous Materials.** What are the environmental impacts of concentrating new housing in areas that are, under existing conditions, disproportionately impacted by environmental hazards, including air pollution and ground toxins?

**General – EIR.** The IS states on page 11 that “the City’s Inventory of Sites will target identifying a capacity of at least 501,642 units.” The State’s General Plan Guidelines states: “The EIR must describe the existing local and regional physical environment, as they exist when the notice of preparation of the EIR is published, emphasizing those features that are likely to be affected by the plan and the environmental constraints and resources that are rare or unique to the area (CEQA Guidelines §§ 15125(a), 15125(c)). It should describe existing infrastructure, such as roads, water systems, and sewage treatment facilities, along with their capacities and current levels of use.” Since the effects of such a large number of units would reverberate throughout many other parts of the General Plan, the EIR should analyze to what degree the Project will increase: water demand; road demand; school demand; power and other utility demand; sewage treatment demand; and the infrastructure in general, and the potential impacts from building the housing prior to supplying the required infrastructure. In addition, what are the local and regionwide environmental impacts of failing to allocate new housing to areas that are proximate to job centers or well served by public transit?

**Other matters raised in response to the NOP.** In addition to the matters identified above for study in the EIR as a result of our review of the IS, the NOP also requests that “information” be identified for consideration and analysis in respect of the EIR. With respect to that request, we note the following:

The state’s exaggerated targets for additional housing that will be incorporated in the 2021-2029 HE unfortunately mask the real story: Decades of overachieving in market-rate housing has not reduced housing costs for lower income households. The state has shown, with decades of data, that it cannot dictate to the market. The market is going to take care of itself. The state’s responsibility is to take care of those left behind in the market’s wake. Based on housing permit progress reports published by the Dept. of Housing and Community Development in July 2020, cities and counties in the four most populous regions continue to strongly outperform on the state’s assigned market-rate housing targets, but fail to achieve even 20% of their low-income housing target. In the Bay Area where permit records have been kept since 1997, there is evidence that this housing permit imbalance has propagated through decades of housing cycles. Accordingly, the EIR should study and explain how the goals, policies, programs, and procedures of the Housing Element Update will encourage affordable housing compared with market rate and luxury housing.

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The NOP states that the rezoning program will prioritize opportunities for rezoning or development incentives in areas that are located in a Transit Priority Area, near major job centers, and in higher resource areas. The EIR should define and thoroughly explain the criteria for a Transit Priority Area, a major job center, and a

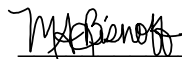
higher resource area. The EIR should explain how an objective of mandating “affordable housing” in an area of the City that is more expensive because it has more natural resources and amenities is consistent with our market-driven, capitalist system.

The EIR should thoroughly explain the timing and procedures behind the statements on page 19 of the IS that discuss the inclusion in the HE of a program to rezone for 93,230 additional units in light of: (i) the Housing Element needs to be updated in 2021, (ii) the Rezoning Program through updates to Community Plans needs to be done by 2024, (iii) many Community Plans have no chance of being updated by 2024, (iv) other Community Plans have already been updated without regard to the upcoming HE, and (v) the actual number of additional units being required by RHNA are substantially less. The EIR should explain how the “inventory of potential sites for rezoning” referred to on page 23 of the IS is consistent with an intention to not tie the hands of communities subsequently updating their Community Plans.

We request, as part of this EIR scoping process, that the City undertake to lay out a clear timeline and sequence respecting the updating and eventual implementation of the Housing Element throughout the many diverse neighborhoods that make up Los Angeles, including the incorporation of up zoning into each of the City’s 35 Community Plans. In addition, we request that the EIR address how the City will incorporate its own surplus inventory of 800,000sf of infill for up zoning.

Sincerely,

BRENTWOOD COMMUNITY COUNCIL



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Michelle A. Bisnoff  
Chairperson

**Housing Element** <housingelement@lacity.org>

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**FW: Housing Element scoping letter.docx**

2 messages

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**Carolyn Jordan** <cjordan@glaserweil.com>  
To: "housingelement@lacity.org" <housingelement@lacity.org>  
Cc: Nancy Freedman <gjf165@gmail.com>

Mon, Feb 15, 2021 at 3:50 PM

Dear Cally Hardy - Please find attached the Brentwood Community Council's comment letter regarding the Initial Study for the EIR for the City of Los Angeles' Housing Element update. My apologies in advance if our council has already submitted the letter. Given the holiday, the submission deadline, and a family emergency of one of our members, I am sending the attached along in the abundance of caution. I am copying a member of our community council who assists in maintaining our records.

Take you for all your efforts on this major undertaking for the City.

Should my work signature appear below, my apologies. I am assisting in my role as Vice Chair to the Brentwood Community Council. I cannot always manage to disable my work signature.

Best.

Carolyn Jordan, Vice Chair, Brentwood Community Council

Although Glaser Weil attorneys and staff are working remotely in order to reduce the risks associated with COVID-19, we will continue doing our utmost to provide prompt, professional service to and on behalf of our clients. Thank you for your understanding.

This email has been scanned for viruses and malware, and may have been automatically archived by Mimecast, a leader in email security and cyber resilience. Mimecast integrates email defenses with brand protection, security awareness training, web security, compliance and other essential capabilities. Mimecast helps protect large and small organizations from malicious activity, human error and technology failure; and to lead the movement toward building a more resilient world. To find out more, visit our website.

**Housing Element scoping letter.docx**

471K

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**Housing Element** <housingelement@lacity.org>  
To: Carolyn Jordan <cjordan@glaserweil.com>  
Cc: Nancy Freedman <gjf165@gmail.com>

Tue, Feb 16, 2021 at 10:50 AM

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



# BRENTWOOD Community Council

**149 S. Barrington Ave., Box 194, Los Angeles, CA 90049**

[www.brentwoodcommunitycouncil.org](http://www.brentwoodcommunitycouncil.org)

February 16, 2021

VIA E-MAIL

housing.element@lacity.org.

Attention: Cally Hardy, City Planning Associate

Dept. of City Planning

200 N. Spring Street, Room 750

Los Angeles, CA 90012

Re: Case No. ENV-2020-6762-EIR  
CPC-2020-1365-GPA

Dear Ms Hardy:

On behalf of the Brentwood Community Council (BCC), I wish to submit the following comments concerning the scope of the EIR for the above Citywide Housing Element 2021-2029 Update and Safety Element Update. These comments are based upon a review by the BCC Land Use Committee (Committee), other interested members of the BCC and members of the Brentwood community of: (i) the Notice of Preparation of a Draft Environmental Impact Report and Notice of Scoping Meeting dated January 13, 2021 (NOP), (ii) the January 2021 Initial Study (IS) prepared by Rincon Consultants Inc. and (iii) the January 28, 2021 Scoping Meeting conducted by the Planning Department.

The NOP requests identification of environmental issues, environmental impacts, **and information** that should be considered and analyzed in the EIR. The NOP defines the "Housing Element Update" or "Project" to include the Housing Element 2021-2029 Update, the Safety Element Update, and rezone program, and those terms are used herein to include those items. The IS lays out the potential environmental impacts to be studied in the EIR. The purpose of this letter is to respond to the NOP and the IS, and help assure that the Project EIR adequately analyzes and assesses potential significant environmental impacts.

Throughout the Initial Study there are references to a proposed draft Housing Element (DHE), but to our knowledge no such draft has been made available to the public for review, and the IS does not include the DHE. The complete absence of any proposed text of the DHE makes meaningful public comment on potentially significant environmental impacts extraordinarily difficult at this stage. Without an opportunity to review the DHE it is not possible for the Committee to ascertain potential significant

impacts that may arise from the adoption of the DHE. The California Office of Planning and Research properly recognizes an EIR for a general plan element update will not provide meaningful information if it is prepared before actual policy language is developed. Accordingly, the EIR scoping process should not be concluded until the public is afforded a reasonable opportunity to review the DHE and provide additional comments concerning the scope of the EIR, as any environmental review of the Project without a DHE will render the process incomplete and inadequate. A revised NOP should be circulated that provides for another round of NOP responses by community members and responsive agencies once Project documents have been updated to include the DHE to ensure that a thorough environmental analysis may be performed.<sup>1</sup>

The BCC agrees that each potentially significant environmental impact identified in the IS must be thoroughly and objectively analyzed and evaluated so that the City and the public will have an honest assessment of the Project's impact upon the environment. The BCC further believes that the Project EIR should specifically analyze and evaluate the topics specified below relative to each subject matter proposed for it to cover.

**Land Use and Planning** - The IS concludes the Project could potentially cause a significant environmental impact due to a conflict with other land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. The Project EIR should specifically address the potential impact upon Very High Fire Hazard Severity Zones (VHFHSZ) if any such zones are included within the Rezoning Program for possible increased housing density. Finally, the EIR should separately analyze the cumulative effects of the Project's land use designations, policies and programs on the environment for each of the City's 35 separate community plan areas.

**Housing and Population.** The IS indicates that the Project goal is to relieve overcrowding and the existing housing cost burden, and to provide housing for the existing unsheltered and unhoused population. The IS also recognizes that the Project could nevertheless result in additional population growth beyond what is forecast in the Regional Housing Needs Assessment (RHNA) for the City, potentially creating a significant environmental impact. The Project EIR should analyze the potential impact of such additional population growth for each community plan area within the Rezoning Program.

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<sup>1</sup> The State's General Plan Guidelines (Guidelines) states "CEQA should not just be a post hoc rationalization of decisions that have already been made. (*Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal. 3d 376, 395)"; and "an EIR will not provide meaningful information if it is prepared before actual policy language is developed." The Guidelines also state: "the lead agency cannot defer its analysis of any significant effect of the general plan to later-tiered EIRs (*Stanislaus Natural Heritage Project v. County of Stanislaus* (1996) 48 Cal.App.4th 182)."



The NOP states the objectives of the Project solely from the supply side of the housing issue. The Project EIR should analyze whether existing and projected vacancies with respect to all types and economic levels of housing in the City will materially impact the need for additional housing capacity for any income level. The Project EIR should analyze whether housing for very low and low income groups can be achieved without funding subsidies and whether establishing new multi-family housing zones alone will increase available affordable housing.

The Project EIR should study the potential environmental impacts of maintaining current single-unit R1 zoning throughout the City and whether the Rezoning Program can be accomplished without changing existing R1 zones. Under what environmental criteria should single-unit R1 zones and zoning be maintained? If single-unit R1 zoning is maintained, what are the environmental impacts to those areas that will be zoned to accommodate new housing under the city's RHNA allocations?

The IS states the City's target additional zoning capacity for housing units will be 501,642, including a 25% buffer above the RHNA allocation for very low and low income housing. The HE EIR will only study the potential environmental impacts of an additional zoning capacity of 429,000 housing units. The HE EIR should study potential environmental impacts of an increased zoning capacity of 501.642 housing units. **Services.**

**Fire Services.** The IS indicates the Project could have a potentially significant impact by placing an unanticipated burden on fire protection services or affecting response times or service ratios. The EIR should specifically address the potential impact of the Project upon providing fire protection services in VHFHSZs, particularly if the increase in housing unit outpaces the ability of the City to expand fire services.

**Police Services.** The IS indicates the Project could have a potentially significant impact by placing an unanticipated burden on police services or affecting response times or service ratios. The police budget is presently being cut, leaving the community with under-funded first responders. The EIR should specifically address the potential impact of the Project upon providing police services should the increase in housing units outpace the ability of the City to expand police services.

**Schools.** As part of the EIR's study of the impact of increased density on public schools, how will the EIR address specific differences within the City - for example, schools with enrollment under capacity vs. schools at, or, over-enrolled?

**Parks.** As part of the EIR's study of the impact of increased density the public parks and recreation system, how will the EIR address specific differences within the City – by each of the different Community Plan areas.

**Transportation.** The Initial Study identifies a number of circumstances where the Project could result in increased trips compared to existing conditions. Trips generated as a result of project development have the potential to impact intersection and roadway segments throughout the City. The proposed project may also conflict with applicable plans and policies addressing the circulation system.

- The EIR should analyze the potential traffic impacts the Project will have upon areas within the Rezoning Program.
- In connection with studying impacts on transportation, the EIR should identify and address neighborhoods that are already unable to accommodate their existing density, i.e., with already established unacceptable service level burdens on roadways.
- The EIR should examine and address the utilization of unused or underused properties near new major transit options located in light industrial or industrial zones as an alternative or supplement to utilizing existing residential communities for increased housing.?
- The EIR should analyze the environmental impact of increased residential density on transportation level of service within a 0.5 mile radius of such impacted roads and intersections.
- The EIR should study and analyze the impact of converting industrial zoning to mixed use/residential within 0.50 mile of mass transit..

**Wildfire.** The IS concludes that the Project will have less than significant impacts upon risks associated with wildfires. This conclusion is based upon an expectation that the Project would not introduce any features, policies or procedures that would in any way encourage housing development in VHFHSZ. Unless the Project will exempt all VHFHSZ from the Rezoning Program, the EIR should analyze the impact it will have upon risks associated with wildfires. Accordingly, the EIR should analyze and describe whether the Project should specifically state that no “Opportunity Sites” are appropriate in VHFHSZ, and study wildfire in the event the Project does not state that no “Opportunity Sites” are appropriate in VHFHSZs. To the extent the Housing Element seeks to adopt any increased housing in VHFHSZ, the EIR should analyze whether that can that be accomplished without a potentially significant negative safety and/or environmental impact?

In studying wildfire, we believe the EIR should address the following topics that relate to wildfires:

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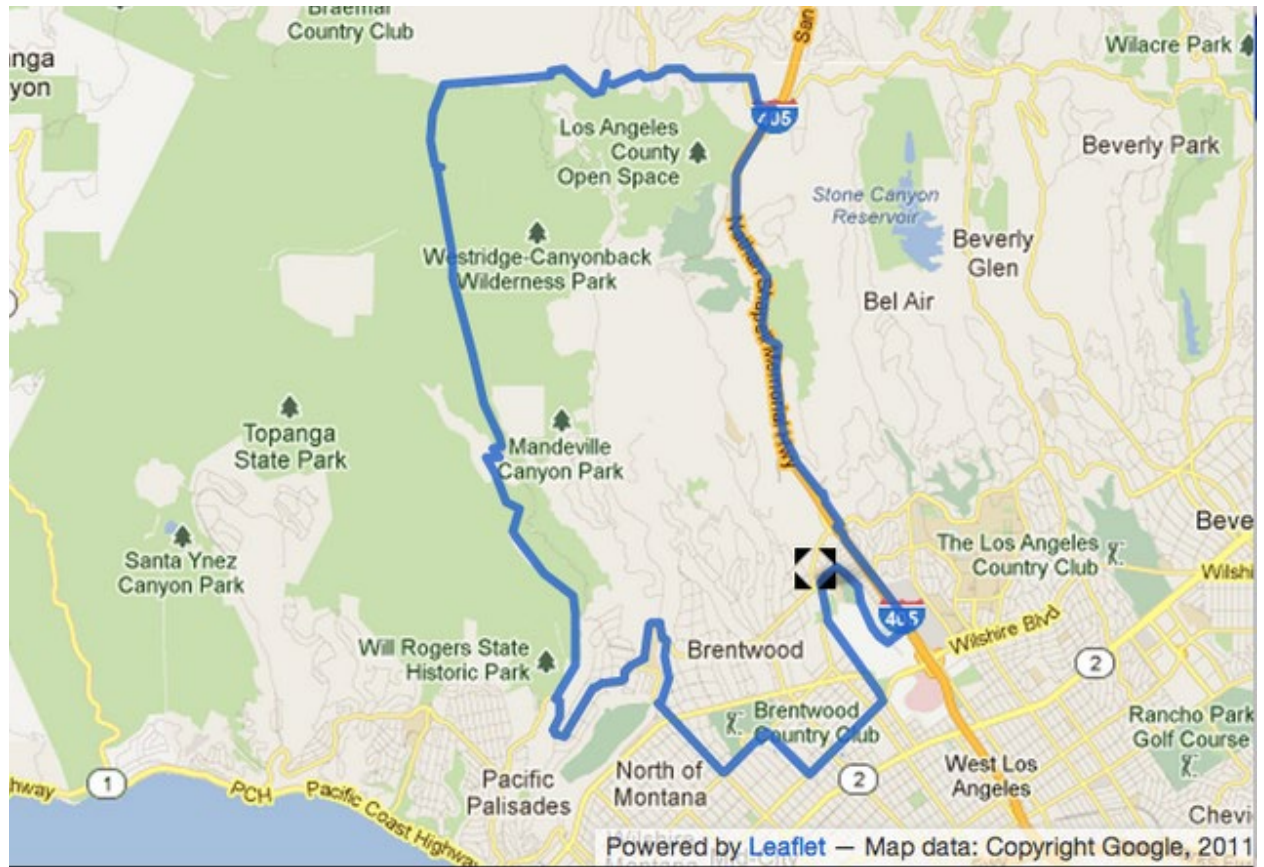
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SB-828 wrongly assumed a 5% vacancy rate in owner-occupied housing is healthy; however, a 5% vacancy in owner-occupied homes is never desirable, and contradicts Government Code 65584.01 (b)(1)(E) which specifies that a 5% vacancy rate applies only

to the rental housing market. The EIR should study and explain to what extent the goals, policies, programs, and procedures of the HE are based on, or the result of, assuming that a 5% vacancy rate in existing and projected owner-occupied housing is desirable. The EIR should specifically address the goals, policies, programs, and procedures in the HE that will address the need for affordable housing, and whether and how up zoning will address that need. The EIR should specifically address the goals, policies, programs, and procedures in the Housing Element Update that will address the need for affordable housing, and whether and to what extent local, State, and Federal funding is assumed will be available to support that affordable housing (funding analyzed from both the supply side and demand side). The EIR should include an Alternative, or at least an explanation, of the housing need in Los Angeles based on a jobs-to-housing ratio of 1.5 (optimal benchmark used by planning agencies), after estimating job growth by 2030.

The NOP states that the rezoning program will prioritize opportunities for rezoning or development incentives in areas that are located in a Transit Priority Area, near major job centers, and in higher resource areas. The EIR should define and thoroughly explain the criteria for a Transit Priority Area, a major job center, and a higher resource area. The EIR should explain how an objective of mandating “affordable housing” in an area of the City that is more expensive because it has more natural resources and amenities is consistent with our market-driven, capitalist system.

The EIR should thoroughly explain the timing and procedures behind the statements on page 19 of the IS that discuss the inclusion in the HE of a program to rezone for 93,230 additional units in light of: (i) the Housing Element needs to be updated in 2021, (ii) the Rezoning Program through updates to Community Plans needs to be done by 2024, (iii) many Community Plans have no chance of being updated by 2024, (iv) other Community Plans have already been updated without regard to the upcoming HE, and (v) the actual number of additional units being required by RHNA are substantially less. The EIR should explain how the “inventory of potential sites for rezoning” referred to on page 23 of the IS is consistent with an intention to not tie the hands of communities subsequently updating their Community Plans.

We request, as part of this EIR scoping process, that the City undertake to lay out a clear timeline and sequence respecting the updating and eventual implementation of the Housing Element throughout the many diverse neighborhoods that make up Los Angeles, including the incorporation of up zoning into each of the City’s 35 Community Plans. In addition, we request that the EIR address how the City will incorporate its own surplus inventory of 800,000sf of infill for up zoning.



Cally Hardy  
Dept of City Planning  
February 15, 2021  
page 11

Sincerely,

BRENTWOOD COMMUNITY COUNCIL



Housing Element <housingelement@lacity.org>

---

## Case Numbers: CPC-2020-1365-GPA. Envelope-2020-6762-EIR

2 messages

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**Nancy Freedman** <gjf165@gmail.com>

Mon, Feb 15, 2021 at 1:54 PM

To: housingelement@lacity.org

Cc: mike bonin <councilman.bonin@lacity.org>, Durrah Wagner <durrah.wagner@lacity.org>, hector banuelos <hector.banuelos@lacity.org>

---

 **EIR Housing Element 2021-29.pdf**  
214K

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**Housing Element** <housingelement@lacity.org>

Tue, Feb 16, 2021 at 10:42 AM

To: Nancy Freedman <gjf165@gmail.com>

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

On Mon, Feb 15, 2021 at 1:54 PM Nancy Freedman <gjf165@gmail.com> wrote:



# BRENTWOOD Community Council

149 S. Barrington Ave., Box 194, Los Angeles, CA 90049

[www.brentwoodcommunitycouncil.org](http://www.brentwoodcommunitycouncil.org)

Attention: Cally Hardy, City Planning Associate  
200 N Spring St, Room 750  
Los Angeles, CA 90012

Greetings Ms. Hardy,

The EIR for the 2021-2029 Housing Element neglects to address the need to preserve mature trees as an alternative to removal and replacement by tiny trees that may or may not survive to grow to maturity.

Suffice to say, interest should be taken for trees on perimeters of properties that can be worked in to a proposed plan. There are ways to relocate mature trees that are healthy. There is a cost for sure, but that can be included in the price of the final project. It will be a plus for the developer to have beautiful mature trees. It can be done. A 60 year old tree on a project next door to our home was relocated at great cost, but is the focal point of the yard. There are companies that do a great job. It is totally possible.

Los Angeles is finally focused on tree canopy and trees relationship to man and climate. Therefore, it is necessary to include saving our mature trees whenever and wherever possible. Please study this as a necessity to incorporate into the EIR study.

To leave it out would be back tracking on the promise to make Los Angeles' canopy greater.

Thank you for your consideration. Our communities deserve mature trees in development projects as a quality of life issue for our citizens.

Best,

Nancy Freedman  
Brentwood Community Council  
Environmental Committee

Mike Bonin, Councilmember District 11  
Durrh Wagner, Field Deputy, District 11  
Hector Banuelos, Urban Forestry Department



Housing Element <housingelement@lacity.org>

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## Case Nos.: CPC-2020-1365-2020-6762-EIR (Citywide Housing Element 2021-2029 Update)

2 messages

---

**Cori Solomon** <terikor1@gmail.com>

Mon, Feb 15, 2021 at 8:32 AM

To: housingelement@lacity.org

Cc: mike.bonin@lacity.org, "bisnoff@gmail.com" <bisnoff@gmail.com>, len.nguyen@lacity.org, jason.p.douglas@lacity.org

Dear Cally,

Attached please find the Brentwood Glen Association's EIR Scoping Letter for the Housing Element.

Please confirm you received this email and the our letter.

Sincerely,

Cori Solomon  
President  
Brentwood Glen Association



**BGA EIR Scoping Letter - Housing Element.pdf**

574K

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**Housing Element** <housingelement@lacity.org>

Tue, Feb 16, 2021 at 10:37 AM

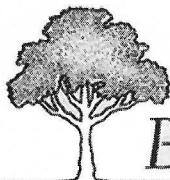
To: Cori Solomon <terikor1@gmail.com>

Cc: "bisnoff@gmail.com" <bisnoff@gmail.com>

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



# BRENTWOOD GLEN

A S S O C I A T I O N

Cori Solomon,  
President

February 12, 2021

Christina Dunlop

Via Email: [housing.element@lacity.org](mailto:housing.element@lacity.org)

Stacy Galina

Attention: Cally Hardy, City Planning Associate

Pamela Halle

Department of City Planning

David Heldman

200 North Spring Street, Room 750

Judy Meadow

Los Angeles, CA 90012

Mary Pringle

Re: Case No. Env-2020-6762-EIR

Jacqui Rosen

CPC-2020-1365-GPA

Neil Smolen

Dear Ms. Hardy:

Teri Solomon

The Brentwood Glen Association ("BGA"), a community of 500 families bounded on the West by the Veterans Administration property, on the north by Sunset Boulevard, on the east by Church Lane, and on the South by Waterford Street, a member of the Brentwood Community Council (BCC), hereby joins in the BCC's comments concerning the scope of the EIR for the above Citywide Housing Element 2021-2029 Update and Safety Element Update.

Yoram Tal

The EIR should study whether increased units will have an impact and be in conflict with areas denominated Very High Fire Hazard Severity Zones (VHFHSZ) in 90049. If areas denominated VHFHSZ in 90049 are excluded then the majority of all the units would effectively and practically be concentrated in the Brentwood Glen and South Brentwood, and thus the total number of units for 90049 should be less due to the impacts in our area. Brentwood Glen does not have the roads, power, sewer, schools, and other infrastructure to support all the 90049 allocated units. The EIR should also look at the impact that densification has on crime incidents, especially with the limited resources we now have with the Los Angeles Police Department to handle increased crime.

Sincerely,

Brentwood Glen Association

Cori Solomon, President



Housing Element &lt;housingelement@lacity.org&gt;

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**Fwd: Scoping Comments for Update of General Plan's Housing and Safety Elements, Case No. ENV-2020-6762-EIR, CPC-2020-1365-GPA**

2 messages

---

**Cally Hardy** <cally.hardy@lacity.org>  
To: Housing Element <housingelement@lacity.org>

Tue, Mar 23, 2021 at 9:15 AM

----- Forwarded message -----

From: **Dan Silver** <dsilverla@icloud.com>

Date: Sat, Mar 20, 2021 at 2:19 PM

Subject: Scoping Comments for Update of General Plan's Housing and Safety Elements, Case No. ENV-2020-6762-EIR, CPC-2020-1365-GPA

To: &lt;cally.hardy@lacity.org&gt;, &lt;housing.element@lacity.org&gt;

Cc: &lt;mike.bonin@lacity.org&gt;, &lt;len.nguyen@lacity.org&gt;, &lt;jason.p.douglas@lacity.org&gt;, &lt;durrah.wagner@lacity.org&gt;

Dear Ms Hardy:

Please find comments enclose. We look forward to working with you and please place Endangered Habitats League on all distribution lists for this project.

Confirmation of receipt is requested and appreciated.

Regards  
Dan

Dan Silver, Executive Director  
Endangered Habitats League  
8424 Santa Monica Blvd., Suite A 592  
Los Angeles, CA 90069-4267

213-804-2750  
dsilverla@me.com  
<https://ehleague.org>

--

LOS ANGELES  
CITY PLANNING

**Cally Hardy** (she/her/hers)  
City Planning Associate  
**Los Angeles City Planning**

200 N. Spring St., Room 750  
Los Angeles, CA 90012  
Planning4LA.org  
(213) 978-1643



---

 **EHL-Housing and Safety Element Updates-3.20.21.pdf**  
323K

---

**Cally Hardy** <cally.hardy@lacity.org>  
To: Housing Element <housingelement@lacity.org>

Tue, Mar 23, 2021 at 9:15 AM

----- Forwarded message -----

From: **Cally Hardy** <cally.hardy@lacity.org>

Date: Tue, Mar 23, 2021 at 9:13 AM

Subject: Re: Scoping Comments for Update of General Plan's Housing and Safety Elements, Case No. ENV-2020-6762-EIR, CPC-2020-1365-GPA

To: Dan Silver <dsilverla@icloud.com>

Cc: <housing.element@lacity.org>

Thank you, your email and attachment has been received. Please note that the scoping period for this project closed on February 15, 2021; however, we have received your letter and will be sure to add it to the environmental case file. We have also added you to the notification list for the project.

Regards,  
Cally

[Quoted text hidden]

[Quoted text hidden]



March 20, 2021

Department of City Planning  
Attention: Cally Hardy, City Planning Associate  
200 North Spring Street, Room 750  
Los Angeles, CA 90012  
housing.element@lacity.org

**RE: Scoping Comments for Update of General Plan's Housing and Safety Elements, Case No. ENV-2020-6762-EIR, CPC-2020-1365-GPA**

Dear Ms. Hardy:

Endangered Habitats League, a Southern California regional conservation group, appreciates the opportunity to comment. Please place us on all notification and distribution lists for the project, including CEQA documents and public hearings.

## **1. The IS Ignores the Significant Impacts of Development in the Wildland-Urban Interface**

The City's initial study (IS) for the project, identifying areas to be addressed in an environmental impact report (EIR) pursuant to the California Environmental Quality Act (CEQA), raises many serious questions and causes for concern, which require extensive environmental analysis, as explained below.

The update of the Housing and Safety Elements gives the City the opportunity to align the City's Housing and Safety Elements with State policy for the reduction of greenhouse gases, and protection of biodiversity, wildlife and wildlife corridors. The update is also essential to the balancing of the City's goal of meeting existing and projected housing needs with the emerging consensus that further development of hillside areas within the Wildland-Urban Interface/Intermix (WUI) creates unacceptable safety risks related to wildfires.

We are particularly concerned that the IS fails to address the impact of hillside development in areas designated by the State as Very High Fire Hazard Severity Zones (VHFHSZ)<sup>3</sup> in a comprehensive and substantive way. The initial study states that updating the Housing Element will have a less than significant impact in the Wildfire analysis category—thereby failing to recognize or even consider that development in hillside areas poses significantly increased wildfire risks. Indeed, the IS itself rebuts the notion that wildfire impacts are insignificant by stating that several recent state laws will likely require updates to some aspects of the General Plan, such as the Safety Element, but not the Housing Element. But the Housing Element covers the City's hillside areas,



where future development creates (at the very least) significant wildfire-related impacts subject to updated CEQA Guidelines analyses. Among other things, these will require that the City consider restrictions on hillside development due to enhanced wildfire risk, as well as consideration and analysis of new CEQA Guidelines environmental impacts.

There is no justification for the conclusion that development in fire-prone hillside areas does not present significant wildfire risks. The only basis for that conclusion in the IS amounts to nothing more than wishful thinking based on factually-unsupported speculation that future hillside development will be *de minimis*:

- “Because the Housing Element Update would generally direct development away from the hillside areas with fire hazards and new development would be required to comply with fire safety provisions established by the Los Angeles Fire Code (2017), future development under the Housing Element Update would not pose a substantial risk to people or structures due to wildland fires. Impacts would be less than significant.” (IS, p. 144.)
- “such development is not likely or anticipated on a level that would significantly conflict with an adopted emergency response plan or emergency evacuation plan.” (IS, p. 142.)

The failure to consider future development is especially problematic because California faces the dangerous new reality of a year-round fire “season” and environmental conditions that make the consequences of wildfires greater than ever before. Over the past year, California has experienced the largest and most destructive wildfire season recorded in its modern history

The vague and unsupported statements in the IS do not constitute substantial evidence to support the IS’s conclusion that there are not potentially significant impacts in the Wildfire analysis category.

The IS’s failure to recognize the significant impacts of further development in hillside areas is contrary to the Governor’s fire policy goals and climate change mandates. In response to the State’s devastating wildfires over the last few years, the Governor’s office released a report recommending local governments deprioritize new development in areas of the most extreme fire risk.

First, there will be more wildfires due to human ignitions. Second, the wildfires that do occur will pose a greater risk to lives and homes and will be more difficult to fight. Hardening of *existing* homes is called for, but reliance upon hardening of homes as a rationale for approving *new* fire-prone development is foolhardy. In the Napa-Sonoma Tubbs fire, houses that were built to current fire codes burned. According to a former Sonoma County planning director and past president of the California chapter of the American Planning Association,

The WUI standards for new buildings increase the odds of a building surviving a wildfire, but relying on a hardened structure to protect whole communities in a

known fire-prone area is the height of hubris and callousness . . . The lesson is that we cannot engineer our way out of every hazard. (*APA Northern News*, Oct. 2018)

The damage inspection report from the Thomas Fire broke down the construction of all buildings damaged or destroyed during the course of the fire in both Ventura and Santa Barbara Counties. By referencing the damages table for the City of Ventura it can be shown that the majority of destroyed structures were of fire-resistant construction, had multi-pane windows, and had eave vent screens. Although not a majority, a significant number of the structures damaged or destroyed had enclosed eaves. Whether these structures were ignited by embers or flame impingement, the fact remains that they burned – even with fire resistant roof and siding construction and enclosed eaves or vent screens. The numbers from the Thomas Fire losses illustrate that ignition resistant construction is *not* a sufficient defense against extreme wildfires.

Further, it is magical thinking to believe that “defensible space”—which is designed for firefighter access—will keep a wind-driven fire out of a community. Fire spreads by wind-driven embers that jump freeways, as seen when the Woolsey Fire (Malibu) jumped the 101.

Similarly, leading fire research scientist Alexandra Syphard worries that the current focus on fuel reduction gives “people a false sense of security.” While fuel reduction is essential to partially offset the risks created by *existing* development in the hillsides, new development exacerbates wildfire risks far beyond the reach of fuel-modification mitigation measures. She warns that to stem the escalating loss of life and property, the state needs to curb development in high fire-hazard zones, help homeowners ember-proof their houses and do a better job of enforcing defensible space regulations.

To save lives and property the City should therefore incorporate expert recommendations in the updated Housing and Safety Elements to (1) institute home-hardening policies to reduce the flammability of existing communities, and (2) prohibit new development in Very High Fire Hazard Severity Zones.

## **2. CEQA Guidance**

In updating the Housing and Safety Elements, the City must review Wildfire impacts under the revised CEQA Guidelines, which now requires analysis of a project’s environmental impacts based on location in a wildfire hazard area. California courts recognize that where projects may exacerbate existing environmental conditions or hazards “an evaluation of how future residents or users could be affected by exacerbated conditions” is required. (*California Building Industry Assn. v. Bay Area Air Quality Management Dist.* (2015) 62 Cal.4th 369.) The CEQA Guidelines have therefore been updated to require an analysis of a project’s wildfire impacts for projects “in or near state responsibility areas or lands classified as very high fire hazard severity zones” to determine whether the project would:

- Substantially impair adopted emergency response or evacuation plans,
- Exacerbate wildfire risks due to slope, prevailing winds, or other factors and expose project occupants to pollutant concentrations from a wildfire or uncontrollable spread of wildfire,
- Require installation/maintenance of wildfire associated infrastructure (roads, fire breaks, water resources, power lines, other utilities) that may exacerbate fire risks or result in environmental impacts, or
- Expose people or structures to significant post-fire risks, such as downslope or downstream flooding/landslides, slope instability, drainage changes.

Based on the revised Guidelines, the City must include a comprehensive analysis of the potentially significant impacts of allowing development in VHFHSZ areas when updating the Housing and Safety Elements. The risk that new development in fire-prone hillside areas will have additional environmental impacts is further supported by evidence that is now widely available. Numerous studies show that human ignition sources are the number one cause of wildfires in our hillsides. Lead author and U.S. Geological Survey wildfire expert Jon Keeley’s “study shows human interaction with the landscape, no matter the climate, is causing most fires.” In fact, 95% of fires are caused by human-ignition sources. According to the IS, the Housing Element will increase the number of units developed around the city, including in Open Space, fire-prone hillsides in the wildland-urban interface/intermix and other vulnerable areas. If additional housing units, commercial and/or multi-use development populates our very high fire hazard severity zones the City will experience more frequent and intense wildfire damage and destruction.

Evacuation routes become a major concern when considering building in fire-prone areas. Many of our hillside roads are substandard with limited ingress and egress making it difficult for those escaping a wildfire event to get out, and emergency vehicles that fight fires to get in concurrently. Councilmember Bonin underscored this concern in his September 22, 2020 motion asking for a report on the capacity, safety, and viability of existing and potential evacuation routes in VHFHSZs, to identify the policies and development standards, including land use and building restrictions, necessary to support these evacuation routes and for the City Planning Commission to submit its report after reviewing the update to the Safety Element of the General Plan.

Despite the mountains of available evidence to the contrary, the IS only briefly speculates that “the Housing Element Update would generally direct development away from the hillside areas with fire hazards” (IS, p. 144) and “such development is not likely or anticipated on a level that would significantly conflict with an adopted emergency response plan or emergency evacuation plan.” (IS, p. 142.) This speculation does not resolve the revised Guideline impact analysis questions and cannot substitute for a proper review and analysis. The IS’s conclusion that there will be no significant impacts in the Wildfire analysis category is not supported by substantial evidence.

The IS also fails to recognize that development in VHFHSZs implicates global warming concerns. The Los Angeles Green New Deal states: “We have to confront the

greatest threat to our physical security and our health – a war on our shores with rising tides, and in our mountains with burning forests. Our fight is to protect our families, and our city, from the impacts of climate change.”

Consequently, the Housing and Safety Elements must consider where housing can be built and where it cannot be built without adversely impacting global warming and wildfire risks. If we continue to build in the WUI, the City will be complicit in the loss of lives, habitat, wildlife and property from wildfires, and contribute to the billions of dollars incurred from these losses.

The IS indicates that the update may allow rezoning and provide development incentives in existing low-density residential zones to create opportunities for missing middle housing typologies. (IS, p. 19.) It appears that this would apply to fire-prone hillside areas. But development in such hillside areas directly conflicts with the State and City’s climate goals, increases the risk of wildfires, and gobbles up the very open space necessary to sustain biodiversity and allow wildlife and wildlife corridors and habitat to flourish.

- Please specify whether the update would allow rezoning and provide development incentives in fire-prone hillsides areas?
- Please provide a map of the areas being considered for rezoning.
- Please provide a wildfire study analyzing the significant impacts of developing in VHFHSZ.
- Please analyze and provide a study of the impacts of adding 419,261 to 429,261 units in areas with special environmental considerations, such as areas located near Open Space, Hillside areas, Very High Fire Hazard Severity Zones, or Coastal Zones.
- Please provide a map of where the Housing Element’s more than 400,000 units will be built and designate on the map areas that are either “state responsibility areas” or lands classified as “very high fire hazard severity zones.”
- Please provide a comprehensive analysis of how the addition of over 400,000 units will impact climate change.

### **3. Local Hazard Mitigation Plan**

The Hazard Mitigation Plan (HMP) rightly asserts that wildfire is determined by climate variability, local topography, and human intervention. Climate change has the potential to affect multiple elements of the wildfire system: fire behavior, ignitions, fire management, and vegetation fuels. Hot dry spells create the highest fire risk. Increased temperatures may intensify wildfire danger by warming and drying out vegetation. Climate change may increase winds that spread fires. Faster fires are harder to contain, and thus are more likely to expand into residential neighborhoods.

The HMP outlines secondary impacts of wildfires. The Housing and Safety Elements must analyze each of these impacts. (See City of Los Angeles 2018 Local Hazard Mitigation Plan, p. 13-11.) According to the HMP, environmental impacts from

wildfires can be severe. (City of Los Angeles 2018 Local Hazard Mitigation Plan, p. 13-13, listing severe impacts due to wildfire.)

- How will the update of the Housing and Safety Elements incorporate these findings and what standard of practice will be implemented to mitigate potentially severe wildfire impacts (for example, more high frequency flood events)?
- Will the City coordinate more frequent model calibration and the development of new forecast-based tools?
- Please provide mapping of both potential landslide and flooding areas particularly where property could be and is located.

#### **4. Resilient Los Angeles**

Resilient Los Angeles is a plan that includes strategies to help fortify our infrastructure, protect our economy, and make our city safer against sudden and unexpected events—from earthquakes to flooding—and address our underlying chronic stresses, such as economic security, climate change, and aging infrastructure.

This plan outlines educational efforts to reduce fire risk and how to respond when a fire or mudslide does occur to help communities stay safe and ensure that firefighters can focus resources on preventing loss of lives and damage to property. Increasing community-level knowledge around wildfire and mudslide risk will help build capacity within neighborhoods to protect against and be prepared for these events, including proactive risk reduction, evacuation, response, and recovery actions.

How will the update of the Housing and Safety Element incorporate the goals and actions outlined in the Resilient LA report?

#### **5. The California Climate Adaptation Planning Guide**

The State’s Climate Adoption Planning Guide outlines the climate change impact concerns for the South Coast climate impact region, which includes Los Angeles. The EIR should consider and analyze conflicts between the Housing and Safety Elements and the Climate Adaptation Planning Guide.

#### **6. Review of California Wildfire Evacuation From 2017-2019**

The report Review of California Wildfire Evacuation From 2017-2019, revealed that in most cases, “local agencies and resources were overwhelmed by the speed and scale of the fires.” The report documented 11 wildfires focusing on the evacuation process. The report concluded that few agencies have the public resources to adequately and swiftly evacuate all populations in danger.

The report also found that areas containing difficult roads faced challenges in evacuating, and neighborhoods with single exits and roads with debris were difficult to evacuate, often leading to severe congestion.

The 11 case studies also revealed several strong similarities related to: human involvement in starting and spreading the fires; windy and dry conditions that exacerbated fire spread; varied and usually ineffective communication methods; considerable congestion due to personal vehicles; rapid filling of shelters; and a lack of formalized re-entry plans.

As reported in the Associated Press,<sup>19</sup> USA Today-California Network analysis of California communities and evacuation routes shows that some areas in the state are far outside the norm when it comes to the number of lanes of roadway available for the size of the population. Among the worst are Pacific Palisades, Eagle Rock and Highland Park.

- How does the EIR mitigate evacuation concerns in areas with substandard roadways?
- Will the City be utilizing an evacuation study to determine road capacity prior to allowing any additional density in the VHFHSZ?
- Given that experts and the above study clearly illustrate the difficulties with evacuation in hillside areas with substandard roadways, how can the City justify continuing to build in VHFHSZs?

## **7. 2020 Los Angeles Biodiversity Report**

The recently released 2020 Los Angeles Biodiversity Report<sup>20</sup> is intended to assist the City reach the goal of no net biodiversity loss as set forth in Mayor Garcetti's Green New Deal plan. It sets forth guidelines for City Planning Staff identifying various Resource and Conservation goals and objectives, including, but not limited to maintaining, preserving, and protecting natural plant and wildlife habitat diversity, wildlife corridors, and linkages. The guidelines recognize the threat of urbanization as it encroaches on these unique and sensitive habitats such as the Santa Monica Mountains. The report also points out that cities are changing rapidly, yet they are just beginning to address climate change and urban ecology in a substantive way.

- How will these goals and policies be enforced when over the next 8 years there is a goal of building over 400,000 units with the option to rezone potentially environmental sensitive areas?
- Does the update of the Housing Element include implementation of the Biodiversity Report to help meet the goals of the Green New Deal? And, if so, how?

The IS states that “it is possible that individual project development sites are also identified in any area where the zoning permits residential uses or as part of the Rezoning Program, including lower density residential sites in the vicinity of native habitats or candidates, sensitive, or special status species.” (IS, p. 52.)

According to the “L.A. City Biodiversity Index,”<sup>21</sup> Los Angeles lies within a designated “global biodiversity hotspot,” one of only 36 in the world. This designation means that biodiversity is both highly concentrated and highly threatened in LA. Cities in biodiversity hotspots often have high numbers of legally protected species, but also high rates of extirpation. The Index has more than 37 plant and animal species listed as threatened or endangered, and an unknown number of species that have been extirpated within its boundary.

The EIR must consider wildlife corridors when analyzing biological resources. New development in the hillsides could also have a significant impact on vegetation and trees that support nesting birds. According to the IS, “Such disturbance could constitute a violation of the CFGC and/or MBTA. (IS, p. 53.)

## **8. Conclusion**

In sum, state law mandates that the City update both the General Plan’s Housing and Safety Elements to account for potentially significant wildfire risks created by new development in fire-prone hillside areas, particularly within those areas designated by the State as VHFHSZs. In so doing, the City must incorporate the goals, objectives and policies of the Local Hazard Mitigation Program to protect communities from unreasonable risks associated with geologic hazards, flooding, and wildland and urban fires.

*More specifically, the City must (1) implement goals, objectives and policies to harden existing structures within VHFHSZs and (2) prohibit new development via up-planning in VHFHSZs. Development consistent with the existing General Plan should a) be limited through a fire hazard overlay and b) must at the very least require evacuation studies and roadway capacity analyses before any new development is approved to ensure any new development within a VHFHSZ will not impair concurrent emergency access—both ingress for firefighters and egress for evacuating residents and surrounding communities.*

Please retain EHL on all distribution lists for this project, including CEQA documents and public hearings. Thank you for considering our view.

Yours truly,



Dan Silver  
Executive Director



Housing Element &lt;housingelement@lacity.org&gt;

---

## Citywide Housing Element Update NOP - Los Angeles Conservancy Comments

2 messages

---

**Erik Van Breene** <vanbreene@laconservancy.org>  
To: "housingelement@lacity.org" <housingelement@lacity.org>  
Cc: Adrian Fine <afine@laconservancy.org>

Mon, Feb 15, 2021 at 3:25 PM

Ms. Hardy,

Please find the Los Angeles Conservancy's comments for the Citywide Housing Element Update attached to this email. If you have any questions, please feel free to contact me directly.

Best,

Erik

### Erik Van Breene

Preservation Coordinator

Los Angeles Conservancy

523 West Sixth Street, Suite 826

Los Angeles, CA 90014

(213) 430-4206 | [vanbreene@laconservancy.org](mailto:vanbreene@laconservancy.org)

Pronouns: He / His / Him / Mr.


[laconservancy.org](http://laconservancy.org)

[E-News](#) – [Facebook](#) – [Twitter](#) – [Instagram](#)

**Membership starts at just \$40**

[Join the Conservancy today](#)

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 **LAC\_Comments-Housing\_Element-NOP-Sent-2021.2.15.pdf**  
311K

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**Housing Element** <housingelement@lacity.org>  
To: Erik Van Breene <vanbreene@laconservancy.org>  
Cc: Adrian Fine <afine@laconservancy.org>

Tue, Feb 16, 2021 at 10:48 AM



Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team  
[Quoted text hidden]



523 West Sixth Street, Suite 826  
Los Angeles, CA 90014

213 623 2489 OFFICE  
213 623 3909 FAX  
[laconservancy.org](http://laconservancy.org)

February 15, 2021

**Sent Electronically**

Cally Hardy, City Planning Associate  
City of Los Angeles, Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012  
Email: [housingelement@lacity.org](mailto:housingelement@lacity.org)

**RE: Notice of Preparation of A Draft Environmental Impact Report for the Citywide Housing Element 2021-2029 Update and Safety Element Update (CPC-2020-1365-GPA; ENV-2020-6762-EIR)**

Dear Ms. Hardy:

On behalf of the Los Angeles Conservancy I am writing to comment on the Notice of Preparation of a Draft Environmental Impact Report (EIR) for the Citywide Housing Element 2021-2029 Update and Safety Element Update. Through my position, the Conservancy also participates in this process as a member of the City's Housing Element Update Task Force. We recognize this as a priority for all Angelenos and essential to the city's growth and development in the future.

The Housing Element Update to the General Plan establishes programs, policies, and actions to further the goal of meeting the existing and projected housing needs of all family income levels in the City of Los Angeles. It provides evidence of the City's ability to accommodate the Regional Housing Needs Assessment (RHNA) allocation through the year 2029, and it identifies any rezoning program needed to reach the required housing capacity. The proposed Housing Element Update will replace the current Housing Element that was adopted in 2013.

As Los Angeles faces one of its worst affordable housing crises since the postwar period, the Housing Element and Community Plan Updates play a pivotal role in providing guidance for equitable housing solutions. Under the RHNA allocation, the City is required to provide capacity for at least 455,577 housing units. Of those, 115,680 are set aside for very low income, 68,590 for low income, and 74,936 for moderate income during the eight-year period. To meet Housing and Community Development (HCD)



requirements, the City will accommodate a 25 percent buffer for a total target capacity of 230,338 units for lower-income households. Given the current zoning, it is estimated that the City will need to include a program to rezone for the creation of 93,230 additional units of capacity. The rezoning program is set to be completed by 2024 and largely accomplished through the implementation of updated Community Plans.

The need to rezone or up-zone to allow for greater density as a means to create increased housing capacity should not come solely at the expense of historic resources. Already affordable and higher-density, HPOZs could be greatly impacted by such changes to zoning. Such measures also put many older, undesignated buildings at risk. Lower density, car-centric properties could be a more viable solution for adding much-needed new housing and density. Below is excerpted from the Conservancy recent study, [Preservation Positive Los Angeles](#), which looks to the city's commercial strip centers as a targeted approach for increasing density and providing new housing production where it makes good planning sense:

According to data from CoStar, the City of Los Angeles has 673 strip centers, 29 commonly known as strip malls. They are commercial buildings, typically one story, with retail or office units arranged in a row with a large parking lot in front. Strip centers in Los Angeles consume more than 24 million square feet of land to accommodate 7,237,000 square feet of gross leasable area for the businesses providing goods and services located there. The average strip center is a 10,753 square foot building sitting on 35,814 square feet of land. The vast majority are located on an existing public transportation routes.

If all the strip centers were rezoned for housing and then developed, they could provide:

- 24 million square feet of land redeveloped into 96 million square feet of buildings in four- and five-story structures.
- 7,237,000 square feet of ground floor commercial space in the new buildings.
- 71.3 million square feet of upper floor residential could create 83,929 apartments of 850 square feet each.
- Even if one parking space were provided for each apartment, 63,416 housing units could still be built.

The above is an oversimplified analysis. Of course, there would need to be a range of unit sizes, some areas could accommodate much higher buildings, and not all current owners of these strip centers may be interested in making the change. This example merely illustrates that there are a variety of viable options to adding both density and housing along transit corridors. This could be accomplished by encouraging the redevelopment of low-density, automobile-oriented parcels, rather than diminishing the quality and character of existing historic neighborhoods.

A recent (August 25, 2020) Spectrum News 1 piece ([“Strip Malls, Big-Box Stores Could be Used for Housing in LA”](#)) also reached this same conclusion, stating there are many under-utilized commercial strip centers and big box retail throughout Los Angeles that could be redeveloped and/or adaptively reused for new housing. Many of these are already located along existing transit so it makes sense to provide affordable housing here. Bottom line, the City needs to offer



substantial incentives to encourage and direct new housing production and density where it makes for good planning and smart development. New housing production should reinforce and build upon our existing community assets. This should be done through various targeted City initiatives, as part of its HCD's programs, the Community Plan update process, and the Housing Element Update.

### **I. Retention and preservation of existing affordable housing and NOAH needs to be prioritized and amplified through concrete strategies**

The RHNA targets are already exceedingly ambitious and will be difficult to meet, and compounded if we are not also developing a clear and comprehensive strategy for affordable housing retention. Simply put, Los Angeles is not able to build its way out of this housing crisis, especially as we consistently destroy existing affordable housing throughout this city at the same time.

It must be recognized that older and historic residences make up a significant number of irreplaceable naturally occurring affordable housing (NOAH). As much as 69 percent of housing in the city's Historic Preservation Overlay Zones (HPOZs) has more than one unit and 39 percent of those properties provide five or more units. These units qualify under the rent stabilization ordinance (RSO), a policy many working class Angelenos depend on to remain in their homes.

The Conservancy strongly encourages the City to develop serious retention and preservation strategies as part of the Housing Element Update, on par with those identified for housing production. It cannot be solely focused on the new construction component without giving serious consideration of what we already have now and are routinely losing. Without a real strategy, we will continue to lose this NOAH and put people at risk of falling into homelessness.

We encourage the consideration of creative approaches to preserve NOAH that involve both the public and private sectors. We understand many of funding programs and options such as the Low Income Housing Tax Credit and bond financing is weighted toward housing production efforts. This requires the City of Los Angeles to get creative. It seems that other cities have approached ways to retain and reinvest in NOAH that would be worth considering for Los Angeles. One recent example is from [Charlotte, North Carolina](#) where private investors created a Housing Impact Fund to purchase and preserve NOAH throughout the City. Housing is maintained long-term through covenants and a financial recapture if a property is sold in the future that supports affordable housing citywide. The City is able to provide strategic help and incentives to ensure projects are viable. It's an innovative model that should be considered for Los Angeles and as part of the Housing Element Update.

### **II. Inclusion of SurveyLA findings and analysis of potential conflicts in the Housing Element Update**

It is imperative that the Housing Element Update include and fully incorporate SurveyLA findings throughout the plan to identify resources and determine any potential conflicts with what is being proposed.



According to SurveyLA, 6.2% of parcels in Los Angeles are designated or considered potentially historic. It should be noted that many of the city’s NOAH and RSO units are located within older and historic buildings and high-density neighborhoods and HPOZs included within the 6.2% of parcels. With nearly 94% of the city available for development and expansion, historic preservation cannot be blamed for impeding development or housing production. Surveys are intended to help identify eligible individual historic resources and areas of concentrations of contributing resources that qualify as potential historic districts. The data from SurveyLA exists and should be fully incorporated into the Housing Element Update and made available in a user-friendly format so that it is useful for long-term planning purposes and balancing preservation and development priorities.

The Housing Element Update should articulate a clear understanding of the survey results to better plan for preservation and development in the future. This information is critical as a starting point in identifying potentially significant resources. Informative maps of historic districts, planning districts, and CPIOs should be fully incorporated into the Housing Element Update document to better inform interested parties.

### **III. Expand Adaptive Reuse and Mills Act application citywide**

As a model for other areas of the City, the Downtown Community Plan Update (DTLA 2040) proposes to update its adaptive reuse program within its Plan Area. As a policy established in 1999 (Adaptive Reuse Ordinance, ARO), adaptive reuse has successfully resulted in the creation of new housing (more than 12,000 new housing units) and reinvestment in existing community assets. Without question, it has also been central to the revitalization of Downtown Los Angeles. Now, following more than twenty years of progress it is time to revise the policy to ensure it remains effective as an incentive to encourage the reuse of existing buildings throughout the City. This is not only good for preservation but sustainability as we need to retain and reinvest in existing resources rather than throw them away.

Today, there are numerous buildings throughout the City that present new challenges and require innovation solutions. Costs for rehabilitation and retrofit are much greater and difficult now than when the ARO was first established, in part due to the complexity of various codes that must be adhered to and an escalation in overall construction.

Many of the Downtown buildings that remain empty are those that present unique challenges (small floor plates, ADA accessibility issues, etc.) and unable to be combined with other buildings or a larger project. Until we are able to help in this area many of these types of historic buildings will remain empty and under-utilized. Therefore additional incentives are especially needed for these types of examples to ensure financial feasibility for rehabilitation. If we can help these projects “pencil out” they have an opportunity to create additional housing.

The Mills Act program is another area the City should look to as a possible incentive that can be used to fuller effect to support NOAH throughout the city. Currently the program is being reviewed for its overall impact and effectiveness. We encourage the City to think creatively how the Mills Act can be applied strategically to support NOAH and ensure greater equity.



#### **IV. Expand Transfer of Development Rights throughout the City**

Transfer of Development Rights (TDR) are a powerful tool to promote the preservation of historic resources and existing naturally occurring affordable housing. The Conservancy has been working closely with City Planning on this concept for the past few years, and we encourage its inclusion in the Housing Element Update. Eligible donor sites must be designated as a Los Angeles Historic-Cultural Monument (HCM), a site listed or determined to be eligible for the California Register of Historical Resources or the National Register of Historic Places, a contributor to a historic district identified by SurveyLA, or an individual resource identified by SurveyLA.

Under a TDR program, donor sites would be allowed to sell unused floor area, up to the maximum Bonus FAR permitted in identified Form Districts to a receiver site in other parts of the city. Such programs promote new mixed-use projects, adaptive reuse, and a greener city environment.

#### **V. Conclusion**

As the City of Los Angeles faces one of its worst housing crises since the Postwar period, the Conservancy is optimistic that the City will craft a policy that meets the current and future housing needs. Historic preservation is an important tool in the City's land use toolkit, by protecting existing naturally occurring affordable housing stock throughout the city, countless low and moderate-income families will continue to have a roof over their heads.

#### **Recommendations:**

- Retention and preservation of existing affordable housing and naturally occurring affordable housing (NOAH) needs to be prioritized and amplified through concrete strategies.
- Implement approaches that target new housing production where it makes good planning sense (under-utilized commercial strip centers) and partner with private sector to create innovative funding models to preserve NOAH.
- Expand the Adaptive Reuse Ordinance and the Mills Act Program to new areas of the city as a means to promote new housing in existing buildings and incentivize the retention and reinvestment in NOAH.
- Expand Transfer of Development Rights to promote residential rehabilitation and greener city planning.



**About the Los Angeles Conservancy:**

The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with nearly 5,000 members throughout the Los Angeles area. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural and cultural heritage of Los Angeles County through advocacy and education.

Please do not hesitate to contact me at (213) 430-4203 or [afine@laconservancy.org](mailto:afine@laconservancy.org) should you have any questions or concerns.

Sincerely,



Adrian Scott Fine  
Senior Director of Advocacy

cc: Department of City Planning's Office of Historic Resources





Housing Element &lt;housingelement@lacity.org&gt;

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**Case Nos.: CPC-2020-1365-GPA; ENV-2020-6762-EIR (Citywide Housing Element 2021-2029 Update)**

2 messages

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**info@pacpalicc.org** <info@pacpalicc.org>

Fri, Feb 12, 2021 at 12:54 PM

To: housingelement@lacity.org

Cc: mike.bonin@lacity.org, "bisnoff@gmail.com" &lt;bisnoff@gmail.com&gt;, davidcard22@gmail.com, len.nguyen@lacity.org, Jason Douglas &lt;jason.p.douglas@lacity.org&gt;, Durrah Wagner &lt;durrah.wagner@lacity.org&gt;

Dear Cally: Attached is the Housing Element Update EIR Comment Letter submitted by Pacific Palisades Community Council

Thank you.

Best regards,

Chris Spitz  
Secretary  
Pacific Palisades Community Council  
[www.pacpalicc.org](http://www.pacpalicc.org)

**PPCCHousing Element Comment Letter.pdf**

329K

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**Housing Element** <housingelement@lacity.org>

Tue, Feb 16, 2021 at 10:26 AM

To: info@pacpalicc.org

Cc: "bisnoff@gmail.com" &lt;bisnoff@gmail.com&gt;, David Card &lt;davidcard22@gmail.com&gt;

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team  
[Quoted text hidden]





## PACIFIC PALISADES COMMUNITY COUNCIL

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February 12, 2021

City of Los Angeles, Dept. of City Planning  
ATTN: Cally Hardy, City Planning Associate  
200 N. Spring St., Rm. 750  
Los Angeles, CA 90012

Via email: [housingelement@lacity.org](mailto:housingelement@lacity.org)

**Re Case Nos.: CPC-2020-1365-GPA; ENV-2020-6762-EIR (Citywide Housing Element 2021-2029 Update)**

Dear Ms. Hardy:

Pacific Palisades Community Council (PPCC) is the most broad-based community organization and has been the voice of the Palisades since 1973. PPCC submits the following comments concerning the scope of the EIR for the Citywide Housing Element 2021-2029 Update (the Project).

These comments are based on a review of the January 2021 Initial Study by the PPCC Community Plan Update Committee (CPUC); on the Scoping Meeting conducted by the Planning Dept. on January 28, 2021; on the CPUC's recommendation to the full PPCC board; and upon further review, discussion and approval by the PPCC board at its public meeting on February 11, 2021. The sole purpose of this letter is to help assure that the Project EIR adequately analyzes and assesses potential significant environmental impacts and should not be deemed as either supporting or opposing the Project. PPCC has not taken a position on the merits of the Project.

We do, however, have a number of concerns, as outlined below.

*Density / Public Safety Concerns:* Pacific Palisades is a scenic, largely residential / R-1 and RE zoned community located **entirely in the Very High Fire Hazard Severity Zone (VHFHSZ)**. There are only two main routes of ingress and egress to and from the Palisades as a whole: Sunset Blvd. and Temescal Canyon Blvd. (to PCH). Many of our neighborhoods (including those located in hillsides as well as those in "flat" areas) have substandard streets and only one point of ingress and egress. We have long experienced significant problems with congestion during wildfire evacuations, most recently during the serious Palisades and Getty fires in fall 2019. For these reasons, PPCC has consistently opposed legislation that would mandate increased housing density in Pacific Palisades on public safety grounds. Our Councilmember Mike Bonin has supported us and agrees that increasing housing density in the VHFHSZ would be unsafe and inappropriate.

Despite the City's emergency evacuation plans and good intentions, due to human error the best laid plans sometimes don't succeed. An example occurred in Pacific Palisades during the 2019 Getty Fire, when some of our neighborhoods were under mandatory evacuation orders and the main evacuation route out of the Palisades (south on PCH towards Santa Monica) was mistakenly blocked by LA County Sheriff's officers and the City's emergency management team, leading to seriously clogged traffic conditions and diversion of traffic north and east back into the projected track of the fire. Although the blockage was temporary, hundreds of residents were prevented from accessing a safe and sensible route out of the area. Any emergency during heavy rush hour or beach day traffic on PCH or Sunset Blvd. only adds to the high risk to public safety. Additional housing density could conceivably exacerbate these types of conditions in future evacuations. This issue should be addressed in the EIR.

Community Plan Concerns: The communities of Pacific Palisades and Brentwood share one Community Plan – the Brentwood-Pacific Palisades Community Plan (the BPPCP). Pacific Palisades also has a Specific Plan – the Pacific Palisades Commercial Village and Neighborhoods Specific Plan (the PPSP). The process of updating these plans has not yet begun; City officials have advised us that the BPPCP update will not occur this year and will likely not even begin until an unspecified time much later in the future, long after the October 15, 2021, deadline for completion of the Project/Housing Element Update.

We note that the Notice of Preparation (NOP) of the draft EIR for the Project states that anticipated rezoning of sites to accommodate additional required housing “will need to be completed by 2024 and will likely be accomplished through updates to the City’s Community Plans, an update to the City’s Density Bonus program, targeted zone changes and zoning ordinances, and updates to specific plans and overlays” (NOP, p. 4). We are concerned that rezoning and/or other updates or changes may occur in order to accommodate additional required housing, and a number may even be assigned to the Palisades, before the process of updating the BPPCP and PPSP has even started and without adequate input or involvement of the Palisades community.

Project Concern: We understand that rezoning to accommodate additional required housing (from 419,261 to 429,261 units) “may occur **anywhere in the City** where residential uses are permitted,” although the program will “prioritize opportunities for rezoning or development incentives in areas that are located in a Transit Priority Area, near major job centers and in higher resource areas” (NOP, p. 4). **These categories are not static;** in fact, “high resource areas” are often defined as those with higher incomes, good schools and other quality amenities (characteristics which are often used to describe the Palisades). Under any of these criteria, it is not unreasonable to conclude that rezoning of Pacific Palisades, to add a currently unknown but possibly high number of additional housing units, may occur in connection with the Project – thus posing a potentially significant risk to public safety due to increased density in the VHFHSZ, as described above.

Based on these concerns, PPCC disagrees with certain findings in the Initial Study of “less than significant impact” and requests that the Project EIR specifically analyze and evaluate the topics specified below.

**1 (a) and (b) – Aesthetics.** PPCC disagrees with the finding that impacts on (a) scenic vistas and/or (b) scenic resources would be less than significant. The Palisades area encompasses bluffs above Pacific Coast Highway with views of the Pacific Ocean and nearby canyons; neighborhoods in the hillsides of the Santa Monica Mountains with panoramic mountain, canyon, city and ocean views; and a designated scenic corridor, Sunset Blvd., where the public may enjoy many of these scenic views and resources. Rare and protected native trees (*e.g.*, Torrey Pines, California Sycamores and Coast Live Oaks) are located in some areas along Sunset Blvd. where development has previously been proposed. Depending on the type and location of rezoning and the amount of additional housing that may be assigned, it is not unrealistic to conclude that significant impacts on scenic vistas and resources may occur.

We understand that the Initial Study states that “the Rezoned Sites would generally not be in areas of the City that are adjacent to scenic resources such as the mountainous and beach areas.” However, as noted above, the NOP emphasizes that rezoning may occur “anywhere in the City where residential uses are allowed,” and/or in “higher resource” areas, *i.e.*, rezoning/additional development in areas such as Pacific Palisades is not conclusively ruled out. The EIR should address the potential impact on scenic views and resources from a range of realistic rezoning possibilities/additional housing numbers that may be assigned to Pacific Palisades

**9 (f) and (g) – Hazards.** PPCC disagrees with the finding that impacts on (f) emergency evacuation and/or (g) exposure to risk of loss, injury or death involving wildland fires would be less than significant. As described above, the entirety of Pacific Palisades is in the VHFHSZ and our

community's routes of ingress and egress are severely limited. We have long experienced serious problems with congestion during wildfire evacuations. Depending on the type and location of rezoning and the amount of additional housing that may be assigned, it is not unrealistic to conclude that significant impacts on emergency evacuation and risk of loss, injury or death involving wildland fires may occur.

We understand that the Initial Study anticipates that existing emergency evacuation plans will be appropriately implemented during emergencies, and that rezoning will "tend to be concentrated in the more densely urbanized portions of the City, and not near the urban wildland interfaces that are subject to fire risk." However, as noted above, the plans are not always appropriately implemented, and the NOP emphasizes that rezoning may occur "anywhere in the City where residential uses are allowed," and/or in "higher resource" areas, *i.e.*, rezoning/additional development in areas such as Pacific Palisades is not conclusively ruled out. The EIR should address the potential impact on emergency evacuation and exposure to risk of loss, injury or death involving wildland fires from a range of realistic rezoning possibilities/additional housing numbers that may be assigned to Pacific Palisades.

**20 (a) - (d) – Wildfire.** For all of the reasons previously stated, PPCC disagrees with the finding that impacts would be less than significant with respect to evacuation plans and/or exacerbation of wildfire risks (a, b). Depending on the type and location of rezoning and the amount of additional housing that may be assigned, it is conceivable that more infrastructure (additional roads or power lines/other utilities) would be required that may exacerbate fire risk or otherwise impact the environment, or would expose people or structures to other risks (c, d). Although, again, the Initial Study maintains that rezoning/additional development would "largely occur" in other areas of the City, the Study also acknowledges: "it is possible that individual project development sites are identified in any area where the zoning permits residential uses or as part of the Rezoning Program, including lower density residential sites in the vicinity of a Very High Fire Hazard Severity Zones (VHFHSZ)."

In light of the fact that rezoning/additional development in areas such as Pacific Palisades is not conclusively ruled out – and is even acknowledged to be a possibility -- we must request, based on our community's long experience with wildfires and evacuation issues, that the EIR address the potential impacts involving wildland fires from a range of realistic rezoning possibilities/additional required housing numbers that may be assigned to Pacific Palisades.

Thank you for your consideration.

Sincerely,

*David Card*

David Card  
Chair, Pacific Palisades Community Council  
Chair, PPCC Community Plan Update Committee  
310-508-3681

cc: Hon. Mike Bonin, Councilmember, CD 11  
Michelle Bisnoff, Chair, Brentwood Community Council

Via email: [mike.bonin@lacity.org](mailto:mike.bonin@lacity.org)

Via email: [bisnoff@gmail.com](mailto:bisnoff@gmail.com)



Housing Element <housingelement@lacity.org>

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## Case Numbers: CPC-2020-1365-GPA; ENV-2020-6762-EIR

2 messages

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**Charming Evelyn** <bcharmz@aol.com>  
Reply-To: Charming Evelyn <bcharmz@aol.com>  
To: "housingelement@lacity.org" <housingelement@lacity.org>

Mon, Feb 15, 2021 at 4:55 PM

Please see attached comments.

Regards,

Charming Evelyn  
Chair - Water Committee  
Vice Chair Environmental Justice Committee  
Sierra Club Angeles Chapter  
Co-Chair CA Conservation Committee - Water  
Sierra Club CA  
Pronouns: she, her, hers  
213-385-0903

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 **City of Los Angeles Housing Element NOP Comments.pdf**  
94K

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**Housing Element** <housingelement@lacity.org>  
To: Charming Evelyn <bcharmz@aol.com>

Tue, Feb 16, 2021 at 10:55 AM

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team  
[Quoted text hidden]



City of Los Angeles, Department of City Planning  
ATTN: Cally Hardy, City Planning Associate  
Case Numbers: CPC-2020-1365-GPA; ENV-2020-6762-EIR  
200 N. Spring Street, Room 750, Los Angeles, CA 90012

Monday, February 15, 2021

Re: LA City Planning Housing Element NOP

Dear Ms. Hardy,

We thank you for the opportunity to submit comments on the LA City Planning Housing Element NOP on behalf of the Sierra Club Angeles Chapter Water and Environmental & Social Justice Committees.

It is typical to encourage infill development without looking at the aspects of increasing air and noise pollution in cities that already predominantly suffer from the worst air pollution standards. We are seeing this play out with communities of color being the hardest hit with Covid-19 in the denser areas of the city. Areas with high asthma and lung disease caused by air pollution. These factors can be mitigated by expanding tree foliage, minimizing the removal of trees and investing in nature-based solutions of rain gardens, bioswales, turf removal, stormwater capture, using drought tolerant plants, ground vegetation and planting more fruit trees.

Infill development can be a positive only if you have less parking, don't add to the traffic and you encourage the use of mass transit, which will lead to less air and noise pollution including GHG. Infill development should encourage walkable, workable, breathable, livable city spaces. Improved non-car transit options- DASH and metro services, frequency of service, mobility hubs, and wayfinding will help continue to improve transportation options and legibility for current users, and increase use and ridership, lowering greenhouse gas emissions.

Using technologies like cool roofs/cool pavement will be needed to combat the urban heat island effect. The draft plan rightfully emphasizes cool roofs and cool pavement as a goal for implementation. Smaller parks are essential and community gardens should be encouraged, where residents can grow their own food. Reclaim paved surfaces like parking spaces for parklets, trees, and plants that capture water.

Hydration stations are crucial to preventing heat related illness, placing these near transit stops, especially bus stops, and pedestrian corridors will greatly improve the plan's efforts to increase climate

resilience. Shade is vital to combating heat, and we strongly support design measures for shade, awnings and other structures in the plan including at bus shelters.

We support creating buffer zones where toxic industries are in close proximity to livable areas and CEQA should not be bypassed at the cost of the health of humans, particularly with development in Brownfield areas.

Sierra Club California supports policies that prohibit new housing developments in Very High Fire Hazard Severity Zones (except for infill in already developed areas consistent with Sierra Club national urban infill policy) to respond to increasing intensity and frequency of devastating wildfires on lives, habitat, property, infrastructure, and the environment. It's important for the city to establish policies to ensure housing is built where it is most appropriate -- High Opportunity Areas -- areas in close proximity to resources and amenities.

Yet, it is also important for the city to be clear about the areas where housing should not be built when there are public health and safety risks, coastal areas due to sea level rise and very high fire hazard zones where there are major fire risks.

As homeless and housing stressed populations continue to grow throughout the city, the homeless tapping streetlights for power is neither safe nor reliable. Power shut-offs to those struggling to pay their mortgages or rents, block rather than assure, access. Including environmental and social justice is an imperative within the City's planning. The plan must also strive to reduce total demand as well as increase environmentally friendlier power by mandating that all new developments and existing public buildings include solar. Demand reductions and local solar will reduce the destructive footprint of solar installations in the desert and other areas on native plants and wildlife.

Access to clean good quality water, must also be taken into consideration. Typically, underserved communities do not have access to clean affordable water and have to rely on smaller agencies that do not make the necessary repairs to maintain their systems. We support the use of tiny homes and encourage more uses of tiny homes to house the homeless, including using the adaptive reuse ordinance to acquire and convert unoccupied, derelict spaces/buildings to affordable/mixed housing uses.

There must be improvements to the RSO, that include ordinance changes that protect more rights for the tenant, such as replacing carpeting, peeling paint, termite protection and a much better process of enforcement and compliance. Prohibit demolition of structurally sound multi-family units subject to rent stabilization unless there is a guaranteed right to return. Establish a guaranteed right for all tenants displaced from demolished housing to return at rents consistent with pre-demolition rates. However, it's crucial that we protect current residents from displacement, provide local job opportunities and emphasize affordable housing while we make those changes.

Create opportunities for organizations and tenants to purchase for sale units.

Los Angeles has a homeless population of over 66,000 and the pandemic has caused and is causing more homeless families than ever before. Monies from government agencies such as CDLAC should go to housing those less fortunate and close attention needs to be paid to these financial opportunities. Homelessness is expensive and takes a toll on the economy, environment, health care and criminal justice systems, and the lives of fellow human beings.

Trash, human waste and other refuse from homeless encampments pollute waterways and our public city spaces. Since public restrooms and trash receptacles are limited, and because many businesses prohibit the homeless from accessing restrooms, People experiencing homelessness are forced to use whatever location they can find to dispose of their trash and other waste. This phenomenon results in a public health hazard and contributes to additional city costs. This situation must be mitigated, with more apartment sized garbage disposal bins near homeless encampments, LA Sanitation Water Stations and Porta potties where needed, if public bathrooms cannot be installed.

Mobile showers/wash stations should be made available.

Last but not least, the City must include and invite the voices of our Indigenous People to the table, not just one tribe, but every tribe that lives/works within LA City.

Sincerely,

Charming Evelyn  
Chair, Water Committee  
Vice chair, Environmental & social Justice Committee  
Sierra Club Angeles Chapter



Housing Element <housingelement@lacity.org>

## Re: Los Angeles 6th Cycle Housing Element Update and Initial Study

2 messages

**Cally Hardy** <cally.hardy@lacity.org>  
To: "Lee A. Kaplan" <Kaplan@hlkklaw.com>  
Cc: Housing Element <housingelement@lacity.org>

Tue, Mar 2, 2021 at 5:38 PM

Thank you, your email and attached letter have been received.

Regards,  
Cally

On Tue, Mar 2, 2021 at 12:28 PM Lee A. Kaplan <Kaplan@hlkklaw.com> wrote:

Dear Mr. Bertoni,

Attached please find a letter submitted on behalf of the Santa Monica Housing Council regarding the City of Los Angeles' 6<sup>th</sup> Cycle Housing Element Update and Initial Study.

Sincerely,

**Lee A. Kaplan** | Attorney at Law

1250 Sixth Street, Suite 200 | Santa Monica, CA 90401

O: (310) 857-2057 | [kaplan@hlkklaw.com](mailto:kaplan@hlkklaw.com)

**HARDING LARMORE KUTCHER & KOZAL, LLP**

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**Cally Hardy** (she/her/hers)  
City Planning Associate  
**Los Angeles City Planning**  
200 N. Spring St., Room 750  
Los Angeles, CA 90012  
[Planning4LA.org](http://Planning4LA.org)  
(213) 978-1643



**Cally Hardy** <cally.hardy@lacity.org>

Tue, Mar 2, 2021 at 5:39 PM



3/25/2021

City of Los Angeles Mail - Re: Los Angeles 6th Cycle Housing Element Update and Initial Study

To: Housing Element <housingelement@lacity.org>

[Quoted text hidden]



**SMHC to City of LA (re Housing Element Initial Study) 2021.03.02.pdf**  
209K

HARDING LARMORE KUTCHER & KOZAL, LLP  
ATTORNEYS AT LAW

WRITER'S DIRECT DIAL

(310) 857-2057

1250 SIXTH STREET, SUITE 200  
SANTA MONICA, CALIFORNIA 90401-1602  
TELEPHONE (310) 393-1007  
FACSIMILE (310) 392-3537

WRITER'S E-MAIL ADDRESS

kaplan@hkkllaw.com

March 2, 2021

VIA E-MAIL

Mr. Vince Bertoni  
Director of Planning  
Los Angeles Department of City Planning  
200 North Spring Street  
Los Angeles, CA 90012

Re: Initial Study (Jan. 2021)  
Project: Los Angeles Citywide Housing Element 2021-2029 Update  
Case Numbers: CPC-2020-1365-GPA & ENV-2020-6762-EUR  
Applicant: City of Los Angeles, Department of City Planning  
Our client: Santa Monica Housing Council  
Our File No. 639.67

Dear Mr. Bertoni:

This letter is submitted on behalf of the Santa Monica Housing Council (SMHC), a non-profit, all-volunteer organization that has been involved in advocacy and litigation<sup>1</sup> around housing issues for more than 30 years. SMHC's advocacy is primarily focused on the City of Santa Monica, where it advocates for smart policies to encourage needed housing growth and address our local and statewide housing crises. Recently, SMHC has been deeply engaged in advocacy surrounding Santa Monica's 6<sup>th</sup> Cycle Housing Element Update. While SMHC is Santa Monica-focused, housing production in Santa Monica does not occur in a vacuum. Santa Monica is surrounded on three sides by the

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<sup>1</sup> SMHC has successfully sued the City of Santa Monica over noncompliance with State housing laws multiple times. SMHC's litigation successes include *Santa Monica Housing Council v. City of Santa Monica*, Los Angeles Superior Court Case No. SC016169 (1992) (successfully challenged unlawful amendment to Santa Monica's Housing Element); *Santa Monica Housing Council v. City of Santa Monica*, Los Angeles Superior Court Case No. SS5191 (1995) (sued Santa Monica for noncompliance with California Housing Element Law, resulting in settlement under which City agreed to rewrite portion of its Housing Element); *Santa Monica Housing Council v. City of Santa Monica*, Los Angeles Superior Court Case No. SC074683 (2003) (challenged Santa Monica's position that the Housing Accountability Act does not apply to charter cities, resulting in settlement under which City agreed to comply with the Act).

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March 2, 2021  
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City of Los Angeles, and as the largest and most influential city in Southern California, Los Angeles' policies inevitably impact the entire region.

As you know, the City of Los Angeles recently released an Initial Study (January 2021) for its own 6<sup>th</sup> Cycle Housing Element Update. After reviewing the Initial Study, SMHC has serious concerns about the way the City is approaching its suitable sites inventory and capacity calculations. The Initial Study suggests that Los Angeles does not intend to comply with its obligations under State law regarding the Housing Element. This is concerning to SMHC because underproduction and inequitable distribution of housing in Los Angeles over the course of the 6<sup>th</sup> Cycle planning period would negatively impact the entire Southern California region, and because other cities (including Santa Monica) are likely to follow Los Angeles' lead in approaching their own housing element updates. It is therefore of paramount importance for Los Angeles to realistically plan to accommodate its 455,577-unit Regional Housing Needs Assessment (RHNA) allocation in a way that evenly distributes residential growth at all income levels throughout the City and does not further entrench the concentration of multifamily housing in lower-resourced areas.

**THE INITIAL STUDY'S CAPACITY PROJECTIONS ARE  
UNREALISTIC AND UNSUBSTANTIATED**

Los Angeles' updated Housing Element will need to include an inventory of suitable sites that can *realistically and demonstrably* accommodate its substantial RHNA allocation.<sup>2</sup> The language of the Initial Study purports to confirm that the City is aware of the requirement that its capacity calculations be realistic.<sup>3</sup> But the assumptions that the City intends to utilize in drafting its sites inventory are anything but realistic.

**A. The Initial Study provides no justification for its projection that housing production will increase fourfold in the 6<sup>th</sup> Cycle without any substantive legal or policy changes.**

According to the Initial Study, the City believes that it can accommodate 408,412 units, or close to 90% of its RHNA allocation (and about 80% of its RHNA target)<sup>4</sup>

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<sup>2</sup> See Gov't Code § 65583(a)(3).

<sup>3</sup> Initial Study, p. 6.

<sup>4</sup> Los Angeles' State-mandated RHNA allocation is 455,577 units. Commendably, the City intends to add a 25% buffer to its lower-income allocation in line with HCD guidance, increasing its RHNA target to 501,642 Units. However, this increased target is meaningless if the City does not intend to pursue it in good faith.

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without any significant zoning or policy changes,<sup>5</sup> leaving just 93,230 units of capacity to be accommodated through zoning and policy changes,<sup>6</sup> much of which would be implemented through already-pending community plan updates.<sup>7</sup>

Yet, the City produced just 113,608 residential units over the course of the 5<sup>th</sup> Cycle Planning Period and contends that 101,662 units will be produced by current projects that are expected to receive certificates of occupancy during the 6<sup>th</sup> Cycle.<sup>8</sup> In addition to these already-planned units, the City “conservatively estimates” that capacity for 306,750 units can be identified without any changes to current zoning or development standards.<sup>9</sup> The Initial Study provides no justification for its projection that housing production could increase from just about 100,000 units in the 5<sup>th</sup> Cycle to over 400,000 units in the 6<sup>th</sup> Cycle without any substantive legal or policy changes.<sup>10</sup> This unsupported assumption that housing production will nearly quadruple through maintenance of the status quo is inconsistent with State law’s requirement that capacity calculations be demonstrable and realistic.<sup>11</sup>

The Initial Study assumes that a massive increase in residential capacity will occur due to affordable housing streamlining tools such as the City’s Transit Oriented Communities (TOC) program, local affordable housing incentive programs, State streamlining legislation such as SB 35 and AB 2162, and recent changes to State Accessory Dwelling Unit (ADU) laws.<sup>12</sup> In reality these laws and programs, while helpful, will not realistically produce nearly the amount of housing that the City is assuming they will.

The City’s TOC program is a useful tool for producing affordable and market rate housing, and the City should be commended for creating and implementing the

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<sup>5</sup> See Initial Study, pp. 15-16 (Stating that the City estimates that its proposed methodology will identify capacity of 306,750 units for the 6th Cycle, and that 101,662 currently pending units are likely to receive certificates of occupancy during the 6<sup>th</sup> Cycle planning period, resulting in capacity of 408,412 units).

<sup>6</sup> Initial Study, p.19.

<sup>7</sup> Initial Study, p. 22.

<sup>8</sup> Initial Study, p. 15.

<sup>9</sup> *Id.*

<sup>10</sup> *Id.*

<sup>11</sup> See Gov’t Code §§ 65583(a)(3) & 65583.2(c)(2).

<sup>12</sup> Initial Study, pp. 14-15.

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program. The City's implementation of the State Density Bonus law has also helped create housing for different income levels. However, both programs were in place for at least part of the 5<sup>th</sup> Cycle planning period during which production was far below what the City is projecting for the 6<sup>th</sup> Cycle. Together, these two programs are producing roughly 20,000 units per year,<sup>13</sup> many if not most of which would likely be built with or without the incentives offered.

While recent changes to State law have certainly led to an increase in local ADU production, the City received a total of 5,374 ADU applications in 2020.<sup>14</sup> Since State law was initially changed in 2017 to facilitate ADU production, less than 40% of ADUs applied for in the City have been granted certificates of occupancy.<sup>15</sup>

Assuming (generously) that 50% of units permitted through the TOC and Density Bonus programs would not have otherwise been built, and that 50% of ADUs applied for will ultimately be built, these existing programs would produce about 12,700 additional units per year, or about 100,000 units over the course of the 8-year 6<sup>th</sup> Cycle on top of the roughly 114,000 units produced during the 5<sup>th</sup> Cycle. This estimate, which does not account for the fact that these programs were already in effect for much of the 5<sup>th</sup> Cycle planning period, would account for about 214,000 units, almost 200,000 fewer than the number the City claims it can realistically accommodate without any changes to zoning or development standards.

The Initial Study references State streamlining legislation such as SB 35 and AB 2162 as additional sources of residential capacity, but it is unlikely that the benefits provided by these bills could even come close to bridging the gap between the capacity projected in the Initial Study and what is actually realistic. SB 35 requires cities to employ a streamlined ministerial approval process for certain qualifying housing development projects.<sup>16</sup> Frequent application of the streamlined approval process can speed up project timelines and reduce entitlement costs, likely resulting in some

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<sup>13</sup> See Los Angeles Dep't of City Planning, Fall 2020 Quarterly Report, p. 23 (stating that the TOC program has produced a total of about 32,000 units since its implementation in Fall 2017, and that the Density Bonus program has produced about 27,000 units over the same period for a combined total of about 59,000 units across 3 years, or 19,667 units annually).

<sup>14</sup> See Los Angeles Dep't of City Planning Housing Progress Dashboard, <https://planning.lacity.org/resources/housing-reports>.

<sup>15</sup> *Id.*

<sup>16</sup> See Gov't Code § 65913.4.

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marginal increase in overall housing production, but any increased development capacity attributable to SB 35 would be insignificant considering the massive discrepancy between the capacity projected by the Initial Study, and the amount of housing that can realistically be accommodated without zoning or policy changes. Further, SB 35 only applies to cities that are failing to achieve their RHNA goals, so by factoring it in to the Initial Study the City is assuming that it will fail to meet its production targets.

AB 2162 provides approval streamlining and other benefits for supportive housing with services for the formerly homeless. While the law could help facilitate an increase in production, supportive housing is expensive to build, and funding is scarce even after the approval of \$1.2 Billion in Proposition HHH funding, almost all of which has already been allocated.<sup>17</sup> Supportive housing will not realistically comprise a significant amount of the City's RHNA target for the 6<sup>th</sup> Cycle.

The Initial Study's suggestion that the programs and legislation discussed above will cause housing production to nearly quadruple without any significant zoning or policy changes is unrealistic and unsubstantiated. The Initial Study does not explain how the City arrived at its 306,750-unit projection, and the projection is inconsistent with State law's requirement that capacity projections be realistic. Significant upzoning beyond what is already being planned through community plan updates will be required to achieve anything close to the capacity projected by the Study.

**B. Pursuant to California Housing Element Law, the City must consider constraints to new housing development.**

Per guidance from the State Department of Housing and Community Development (HCD), the City will be required to account for various real-world factors in determining the realistic capacity of sites in its inventory, and describe the methodology used.<sup>18</sup> Likelihood of development should be included as a factor in each capacity

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<sup>17</sup> See Ron Galperin, *The High Cost of Homeless Housing Review of Proposition HHH* (Office of Los Angeles City Controller, Oct. 8, 2019), <https://lacontroller.org/audits-and-reports/high-cost-of-homeless-housing-hhh/> (stating that the average cost of construction for one unit of supportive housing exceeds \$530,000, far exceeding original projections).

<sup>18</sup> Megan Kirkeby, *Housing Element Site Inventory Guidebook and Memorandum Regarding Government Code Section 65583.2* (Cal. Dep't of Hous. & Community Dev., June 10, 2020) p. 19.

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calculation.<sup>19</sup> The Initial Study states that the City is developing its methodology and lists factors that will be considered.<sup>20</sup> The only factors listed for consideration in the Initial Study are items that could help bolster housing production.<sup>21</sup> In order to estimate capacity realistically, the City needs to consider impediments to development as well.<sup>22</sup>

### **THE CITY'S PLANNED APPROACH WOULD FAIL TO DISTRIBUTE HOUSING EQUITABLY**

The approach outlined in the Initial Study is also problematic because it fails to disperse housing growth throughout high-opportunity areas as required by State law.<sup>23</sup> In identifying sites for its Housing Element inventory, the City is required to consider "...whether the identified sites serve the purpose of replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity."<sup>24</sup> The Initial Study acknowledges the City's obligation to facilitate equitable growth through the Housing Element update,<sup>25</sup> but the approach that the City is taking suggests that the City is not serious about meeting this obligation.

Recent residential development in the City has been highly concentrated in and around Downtown Los Angeles, with relatively little growth on the City's Westside and other high-opportunity areas.<sup>26</sup> The absence of any plan for significant zoning or

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<sup>19</sup> *Id.* at p. 22.

<sup>20</sup> Initial Study, pp. 14-15.

<sup>21</sup> See Initial Study, pp. 14-15 (stating that estimates will be adjusted upward based on various local and State programs and legislation, but not mentioning any impediments to housing production that will be considered).

<sup>22</sup> See Megan Kirkeby *supra* n. 18 at pp. 20-21 (stating that potential impediments to housing development such as land use controls, improvement requirements, environmental hazards, and water, sewer, and utility capacity should all be considered when calculating residential capacity).

<sup>23</sup> See Gov't Code § 65583(c)(5) & (c)(10).

<sup>24</sup> Zachary Olmstead, *AB 686 Summary of Requirements in Housing Element Law* (Cal. Dep't of Hous. and Community Dev., Apr. 23, 2020) p. 6, [https://www.hcd.ca.gov/community-development/housing-element/housing-element-memos/docs/ab686\\_summaryhousingelementfinal\\_04222020.pdf](https://www.hcd.ca.gov/community-development/housing-element/housing-element-memos/docs/ab686_summaryhousingelementfinal_04222020.pdf).

<sup>25</sup> Initial Study, p. 4.

<sup>26</sup> See Initial Study, Figure 4, p. 18.

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regulatory reform as part of the Housing Element update process suggests that the City has not seriously considered how it can promote ethnic and economic diversity, and that the current patterns of development, which concentrate multifamily housing in lower-opportunity areas, are likely to continue throughout the 6<sup>th</sup> Cycle planning period. The City must comply with State law by more evenly dispersing future housing growth throughout the City, with a focus on bringing more market rate and affordable housing to the Westside and other high opportunity neighborhoods.

Our understanding is that the Planning Department believes that the City is required by law to include all sites with potential existing residential capacity in the Housing Element's suitable sites inventory, which could help explain why so many sites have been identified in low-resource areas. However, the State Housing Element Law grants the City discretion to determine which sites should be included in its inventory,<sup>27</sup> and this discretion should be exercised in furtherance of the City's obligation to promote diversity and environmental justice through the Housing Element, and specifically to encourage development of new affordable housing in areas of opportunity.<sup>28</sup>

Incentivizing housing the Westside and in other high-opportunity areas is also an environmental imperative. West Los Angeles is one of the most jobs-rich areas in Southern California.<sup>29</sup> By failing to locate sufficient housing near employment centers, Los Angeles and other cities are driving a jobs/housing imbalance. Failing to locate sufficient housing near job centers forces people to commute longer distances to work, increasing vehicle miles travelled and carbon emissions, and degrading air quality.<sup>30</sup> Distributing new housing throughout high-opportunity neighborhoods on the Westside would help address the climate crisis and improve local air quality.

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<sup>27</sup> See Gov't Code § 65583.2(c).

<sup>28</sup> See Gov't Code § 65583(c)(10); See also Megan Kirkeby *supra* n. 18 at p. 8 (stating that State law requires a jurisdiction to identify sites throughout the community, in a manner that is consistent with its duty to affirmatively further fair housing).

<sup>29</sup> John R. Hipp, Kevin Kane, & Jae Hong Kim, "Jobs-Housing Balance in Egooods in Southern California," *MFI Quarterly Report: 2017\_1*. Irvine, CA: (Metropolitan Futures Initiative (MFI), Univ. of Cal. Irvine, Jan. 1, 2017) p. 6, [https://issuu.com/ucisocialecology/docs/uci16\\_mfi\\_report4\\_final](https://issuu.com/ucisocialecology/docs/uci16_mfi_report4_final).

<sup>30</sup> Patrick Kallerman Micah Weinberg, *Another Inconvenient Truth: To Achieve Climate Change Goals, California Must Remove Barriers to Sustainable Land Use* (Bay Area Council Econ. Inst., Aug. 2016) at pp. 1-2, [http://www.bayareaeconomy.org/files/pdf/Another\\_Inconvenient\\_Truth\\_BACEI16.pdf](http://www.bayareaeconomy.org/files/pdf/Another_Inconvenient_Truth_BACEI16.pdf).



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### CONCLUSION

The Initial Study suggests that Los Angeles is taking the wrong approach to its Housing Element update and is not serious about meeting its obligations under State law. The City's increased RHNA target can only be reached through the implementation of major zoning and regulatory reforms. The Initial Study's projections of future housing growth under the status quo are extremely unrealistic, and the City must revisit its approach and make changes to zoning and development standards a much larger part of the equation. The City must also comply with its obligation to equitably distribute new housing by enacting policies that will disperse new residential development throughout the City and bring more housing to high-opportunity areas.

Sincerely,



Lee A. Kaplan

cc: Cally Hardy  
Kevin Keller  
Arthi Varma  
Shana Bonstin  
Lisa Webber  
Wajiha Ibrahim  
Matthew Glesne  
Jackie Cornejo  
Claudia Monterrosa  
Councilmember Mike Bonin  
Len Nguyen  
Jason Douglas  
Councilmember Paul Koretz  
Daniel Skolnick  
Councilmember Nury Martinez  
Max Podemski  
SMHC Board of Directors



Housing Element <housingelement@lacity.org>

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## Citywide Housing Element 2021-2029 Update and Safety Element Update EIR Scoping Comment Letter ENV-2020-6762-EIR

2 messages

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**Kim Christensen** <mail.kimchristensen@gmail.com>  
To: HousingElement@lacity.org  
Cc: WOWHOA <wowhoa@ca.rr.com>

Mon, Feb 15, 2021 at 5:14 PM

Ms. Hardy,

Please find attached the West of Westwood Homeowners Association EIR Scoping Comment Letter regarding the Citywide Housing Element 2021-2029 Update and Safety Element Update.

Please confirm receipt of our letter and please place us on your notification list for any further action on the Housing Element Update and EIR (community meetings, webinars, EIR comment period, Housing Element comment period, public hearing notices).

Thank you,

Kimberly Christensen, AICP  
West of Westwood Homeowners Association Board of Directors



**Housing Element 2021\_2029 Update West of Westwood HOA EIR scoping letter,.02.15.2021.pdf**  
253K

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**Housing Element** <housingelement@lacity.org>  
To: Kim Christensen <mail.kimchristensen@gmail.com>  
Cc: WOWHOA <wowhoa@ca.rr.com>

Tue, Feb 16, 2021 at 10:57 AM

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team  
[Quoted text hidden]

February 15, 2021

City of Los Angeles Department of City Planning  
Attn: Cally Hardy, City Planning Associate  
200 North Spring Street, Room 750  
Los Angeles, CA 90012  
c/o [HousingElement@lacity.org](mailto:HousingElement@lacity.org)

**RE: Citywide Housing Element 2021-2029 Update and Safety Element Update**

**Case No. CPC-2020-1365-GPA**  
**CEQA: ENV-2020-6762-EIR**

Dear Ms. Hardy:

The West of Westwood Homeowners Association (WOWHOA) provides the following comments in response to the Notice of Preparation and Scoping Meeting for the Environmental Impact Report to be prepared for the Citywide Housing Element 2021-2029 Update and the Safety Element Update in support and agreement with the comments provided by the Westside Neighborhood Council.

Initial Study Checklist: Issue Areas to be Analyzed, Level of Impact, and Potential Mitigation Measures:

1. Trees as Related to Biological Resources (Section 4e), Air Quality (Sections b, c, d), and Greenhouse Gas (Section a) analysis.

Assumptions in the Initial Study and draft concepts of the Housing Element are based upon continued densification of the most urbanized areas based upon the City of Los Angeles CTAC/HCD Opportunity Zones, TOC zoning and transit priority areas. Trees are an enormous ecological resources that helps improve air quality and reduce greenhouse gases and heat island effect. The loss of urban tree canopy throughout the City of Los Angeles with increased urbanization and densification of housing that would occur with the nearly 500,000 housing units to be added to the City based upon the City's RHNA allocation will have potentially significant impacts to biological resources, air quality and greenhouse gases. This will potentially occur both on private property and in some cases in City parkways/sidewalks. The discussion and analysis in the biological resources section in the initial study is limited to a heritage trees and the Protected Tree Ordinance and replacement ratios for those trees. Loss of all trees has a much broader impact as mentioned above and needs to be studied not just for heritage trees. Increased urbanization and densification of housing development as will be proposed in the Housing Element will reduce pervious surfaces and landscaped areas on private property whether it is single-family residences with the addition of ADU's or small commercial buildings on commercial corridors that frequently do not have building footprints that occupy entire lots being replaced with mid-rise to high-rise residential and mixed-use residential development that typically occupies virtually and entire parcel of land with housing built on top of a parking podium (whether at grade, subterranean or semi-subterranean).

Correspondingly, loss of the urban tree canopy means potentially significant impacts to birds with the reduction in trees that provide safety and nesting opportunities for birds. Mitigation measures must be required and Municipal Code requirements must be established that require tree replacement for loss of trees. Additionally, loss of mature trees should require similar replacement ratios (4 to 1) to the Protected Tree Ordinance requirements for Heritage trees. Replacement trees should be a minimum of 24-inch box size trees with a larger minimum size for large mature tree replacement. Further consideration should be given to mandating replacement with shade trees preferably not deciduous trees. Palm trees and similar species that provide no shade or reduction in greenhouse gases should not be acceptable replacement trees. Palm trees are frequently chosen by developers for housing projects and they do not contribute to GHG reduction, shade, reduction in heat island effect and opportunities for bird habitat. If trees are not required to be replaced, the impacts to air quality and increase in greenhouse gases will be even greater.

The WOWHOA requests that these issues be analyzed in the EIR and that mitigation measures be developed for the loss of any trees as discussed above.

## 2. Parks and Open Space as Related to Air Quality, Recreation and Public Services (Parks)

Increased urbanization and densification of housing development will have potentially significant impacts to air quality, recreation and public services. Development impact fees have not historically proven to provide sufficient resources in the City of Los Angeles to offset loss of park and open space and/or to increase these resources particularly when considering the potential of nearly half a million new housing units during the upcoming planning period. Additional mitigation measures should be considered and implemented to provide land and/or on-site amenities open to the larger community to offset some impacts. This should be applicable particularly to larger scale projects. The City of Los Angeles has deficient ratios of park acreage per 1,000 persons throughout the City including in the West Los Angeles area. There are no parks within the WOWHOA boundary, however Palms Parks is nearby on Overland Avenue by the I-10 Freeway. This resource is not sufficient for the population in the area and the increased housing potential in the Transit Oriented Communities (TOC) zoning along with other up-zoning that may occur to accommodate the sufficient sites criteria. This issue needs to be analyzed thoroughly in the EIR.

## 3. Aesthetics – Light and Glare

The WOWHOA believes that light and glare (Aesthetics Section 1) has the potential to significantly increase light and glare and that the initial study checklist should be modified and that it should be studied further in the EIR. The analysis does not adequately address the impacts of adding nearly a half million housing units to the City in the next 8 years.

## 4. Traffic Impacts (Section c and d)

The WOWHOA requests that thorough analysis occur for the impacts of emergency access. Many of the residential neighborhoods along the Exposition Light Rail Corridor with the WNC areas has experienced reduced ingress/egress as a result of the implementation of traffic measures and increased cut-through traffic (pre-pandemic). These issues need to be carefully evaluated as to their impacts with requirements for additional housing capacity based upon existing up-zoning (TOC) and any potential future up-zoning that could occur through the West Los Angeles Community Plan update or be proposed by the City in response to proposed future re-zoning to implement the Housing Element policies and goals.

Other related concerns that should be evaluated is the practice of the Building Department to waive street dedication requirements with housing and mixed-use development projects that sometimes result in maintaining streets that are substandard in roadway width that limits emergency access and can create safety hazards and traffic bottlenecks. Impacts of these practices should be evaluated in the EIR and prohibited as part of implementation of new housing development.

5. Utilities and Service Systems (Water and Wastewater)

The WOWHOA agrees that there are potentially significant impacts to utilities and service systems and are particularly concerned with impacts to water and wastewater (sewage systems).

We appreciate consideration of our comments and look forward to reviewing the Draft Housing Element and the draft EIR upon their completion. We would appreciate continued notification to the West of Westwood Homeowners Association throughout the remainder of the Housing Element and Housing Element EIR process when these documents are available for public comment and when community meetings, webinars and all public hearings are scheduled. Please do not hesitate to contact us with any questions.

Sincerely,

*Kimberly Christensen*

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Kimberly Christensen, Board Member and Land Use Chair  
West of Westwood Homeowners Association

and

*Terri Tippit*

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Terri Tippit, President  
West of Westwood Homeowners Association

Cc: Vince Bertoni, Director of Planning ([vince.bertoni@lacity.org](mailto:vince.bertoni@lacity.org))  
Councilman Paul Koretz, CD5 ([paul.koretz@lacity.org](mailto:paul.koretz@lacity.org))  
Daniel Skonick, Planning Deputy, CD5 ([daniel.skolnick@lacity.org](mailto:daniel.skolnick@lacity.org))  
Angel Izard, District Deputy, CD5 ([angel.izard@lacity.org](mailto:angel.izard@lacity.org))

**West of Westwood Homeowners Association • P.O. Box 64496 • Los Angeles, CA , 90064**  
email:[wowhoa@ca.rr.com](mailto:wowhoa@ca.rr.com) website: [www.wowhoa.org](http://www.wowhoa.org)  
Phone: 310.475.2126



Housing Element <housingelement@lacity.org>

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## Citywide Housing Element 2021-2029 Update and Safety Element Update EIR Scoping comments CPC-202-1365-GPA ENV2020-6762-EIR

2 messages

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**Kimberly Christensen** <kimwncseat4@gmail.com>

Mon, Feb 15, 2021 at 4:44 PM

To: HousingElement@lacity.org

Cc: Terri Tippit <westsidenc@ca.rr.com>, Barbara Broide <bbroide@hotmail.com>

Attn: Ms. Hardy:

Please find attached a letter from the Westside Neighborhood Council regarding our EIR Scoping comments in response to the NOP for the Housing Element 2021-2029 Update and Safety Element Update.

Please confirm receipt of our letter and please keep us on the mailing list for all community meetings, webinars, draft documents (Housing Element, EIR), and public hearings for this Housing Element 2021-2029 Update and its EIR.

Thank you,

Kimberly Christensen, AICP

(submitted on behalf of Terri Tippit, President of the Westside Neighborhood Council)



**WNC EIR Scoping letter re Housing Element 2021\_2029 Update.02.15.2021.pdf**

238K

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**Housing Element** <housingelement@lacity.org>

Tue, Feb 16, 2021 at 10:54 AM

To: Kimberly Christensen <kimwncseat4@gmail.com>

Cc: Terri Tippit <westsidenc@ca.rr.com>, Barbara Broide <bbroide@hotmail.com>

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,

The Housing Element Team

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**WESTSIDE NEIGHBORHOOD COUNCIL**

P.O. Box 64370 Los Angeles, CA 90064

**www.wncla.org (310) 474-2326**



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Lisa Morocco, Vice-Chair  
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Louis Schillace  
Joseph Roth  
Jae Wu

February 15, 2021

City of Los Angeles Department of City Planning  
Attn: Cally Hardy, City Planning Associate  
200 North Spring Street, Room 750  
Los Angeles, CA 90012  
c/o [HousingElement@lacity.org](mailto:HousingElement@lacity.org)

**RE: Citywide Housing Element 2021-2029 Update and Safety Element Update**

**Case No. CPC-2020-1365-GPA**

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1. Trees as Related to Biological Resources (Section 4e), Air Quality (Sections b, c, d), and Greenhouse Gas (Section a) analysis.

Assumptions in the Initial Study and draft concepts of the Housing Element are based upon continued densification of the most urbanized areas based upon the City of Los Angeles CTAC/HCD Opportunity Zones, TOC zoning and transit priority areas. Trees are an enormous ecological resources that helps improve air quality and reduce greenhouse gases and heat island effect. The loss of urban tree canopy throughout the City of Los Angeles with increased urbanization and densification of housing that would occur with the nearly 500,000 housing units to be added to the City based upon the City's RHNA allocation will have potentially significant impacts to biological resources, air quality and greenhouse gases. This will potentially occur both on private property and in some cases in City parkways/sidewalks. The discussion and analysis in the biological resources section in the initial study is limited to a heritage trees and the Protected Tree Ordinance and replacement ratios for those trees. Loss of all trees has a much broader impact as mentioned above and needs to be studied not just for heritage trees. Increased urbanization and densification of housing development as will be proposed in the Housing Element will reduce pervious surfaces and landscaped areas on private property whether it is single-family residences with the addition of ADU's or small commercial buildings on commercial corridors that frequently do not have building footprints that occupy entire lots being replaced with mid-rise to high-rise residential and mixed-use residential development that typically occupies virtually and entire parcel of land with housing built on top of a parking podium (whether at grade, subterranean or semi-subterranean).

Correspondingly, loss of the urban tree canopy means potentially significant impacts to birds with the reduction in trees that provide safety and nesting opportunities for birds. Mitigation measures must be required and Municipal Code requirements must be established that require tree replacement for loss of trees. Additionally, loss of mature trees should require similar replacement ratios (4 to 1) to the Protected Tree Ordinance requirements for Heritage trees. Replacement trees should be a minimum of 24-inch box size trees with a larger minimum size for large mature tree replacement. Further consideration should be given to mandating replacement with shade trees preferably not deciduous trees. Palm trees and similar species that provide no shade or reduction in greenhouse gases should not be acceptable replacement trees. Palm trees are frequently chosen by developers for housing projects and they do not contribute to GHG reduction, shade, reduction in heat island effect and opportunities for bird habitat. If trees are not required to be replaced, the impacts to air quality and increase in greenhouse gases will be even greater.

The WNC requests that these issues be analyzed in the EIR and that mitigation measures be developed for the loss of any trees as discussed above.

## 2. Parks and Open Space as Related to Air Quality, Recreation and Public Services (Parks)

Increased urbanization and densification of housing development will have potentially significant impacts to air quality, recreation and public services. Development impact fees have not historically proven to provide sufficient resources in the City of Los Angeles to offset loss of park and open space and/or to increase these resources particularly when considering the potential of nearly half a million new housing units during the upcoming planning period. Additional mitigation measures should be considered and implemented to provide land and/or on-site amenities open to the larger community to offset some impacts. This should be applicable particularly to larger scale projects. The City of Los Angeles has deficient ratios of park acreage per 1,000 persons throughout the City including in the West Los Angeles area. Although there are two primary parks located within the Westside Neighborhood Council boundaries, these resources are not sufficient for the population in the area and the increased housing potential in the Transit Oriented Communities (TOC) zoning along with other up-zoning that may occur to accommodate the sufficient sites criteria. This issue needs to be analyzed thoroughly in the EIR.

## 3. Aesthetics – Light and Glare

The Westside Neighborhood Council believes that light and glare (Aesthetics Section 1) has the potential to significantly increase light and glare and that the initial study checklist should be modified and that it should be studied further in the EIR. The analysis does not adequately address the impacts of adding nearly a half million housing units to the City in the next 8 years.

## 4. Traffic Impacts (Section c and d)

The Westside Neighborhood Council (WNC) requests that thorough analysis be conducted for the impacts of emergency access. Many of the residential neighborhoods along the Exposition Light Rail Corridor with the WNC areas has experienced reduced ingress/egress as a result of the implementation of traffic measures and increased cut-through traffic (pre-pandemic). These issues need to be carefully evaluated as to their impacts with requirements for additional housing capacity based upon existing up-zoning (TOC) and any potential future up-zoning that could occur through the West Los Angeles Community Plan update or by the City in response to proposed future re-zoning to implement the Housing Element policies and goals.



Other related concerns that should be evaluated is the practice of the Building Department to waive street dedication requirements with housing and mixed-use development projects that sometimes result in maintaining streets that are substandard in roadway width that limits emergency access and can create safety hazards and traffic bottlenecks. Impacts of these practices should be evaluated in the EIR and prohibited as part of implementation of new housing development.

#### 5. Utilities and Service Systems (Water and Wastewater)

The Westside Neighborhood Council agrees that there are potentially significant impacts to utilities and service systems and are particularly concerned with impacts to water and wastewater (sewage systems).

#### Alternatives

The Initial Study provided no discussion of possible alternatives that may be studied in the EIR. It is difficult to provide input regarding appropriate Alternatives besides the “No Project” Alternative required by CEQA without a draft Housing Element as a basis for any recommendations. However, the Westside Neighborhood Council would like to reserve the right to comment regarding Alternatives to the EIR once the draft sites inventory analysis and draft Housing Element is complete and publicly released.

We appreciate consideration of our comments and look forward to reviewing the Draft Housing Element and the draft EIR upon their completion. We would appreciate continued notification to the Westside Neighborhood Council throughout the remainder of the Housing Element and Housing Element EIR process when these documents are available for public comment and when community meetings, webinars and all public hearings are scheduled. Please do not hesitate to contact us with any questions.

Sincerely,

*Terri Tippit*

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Terri Tippit, Chair  
Westside Neighborhood Council

Cc: Vince Bertoni, Director of Planning ([vince.bertoni@lacity.org](mailto:vince.bertoni@lacity.org))  
Councilman Paul Koretz, CD5 ([paul.koretz@lacity.org](mailto:paul.koretz@lacity.org))  
Daniel Skonick, Planning Deputy, CD5 ([daniel.skolnick@lacity.org](mailto:daniel.skolnick@lacity.org))  
Angel Izard, District Deputy, CD5 ([angel.izard@lacity.org](mailto:angel.izard@lacity.org))



Housing Element <housingelement@lacity.org>

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## NOP Comment Letter Housing Element

2 messages

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**Barbara Broide** <bbroide@hotmail.com>

Tue, Feb 16, 2021 at 4:32 PM

To: "cally.hardy@lacity.org" <cally.hardy@lacity.org>, "housingelement@lacity.org" <housingelement@lacity.org>

Cc: Paul Koretz - cd 5 <paul.koretz@lacity.org>, Daniel Skolnick <daniel.skolnick@lacity.org>, Angel IZard - CD 5 <angel.izard@lacity.org>

Attached you will find our comment letter in response to the NOP for the DEIR for the Housing Element sent on behalf of Westwood South of Santa Monica Blvd. Homeowners Association (WSSM).

I trust that it will be accepted as yesterday, Feb. 15 was a Federal holiday and we were unable to forward it then.

Thank you,

Barbara Broide



**WSSM to Planning-Housing Element FINAL 2-15-21.docx**

137K

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**Housing Element** <housingelement@lacity.org>

Tue, Feb 16, 2021 at 4:33 PM

To: Barbara Broide <bbroide@hotmail.com>

Cc: "cally.hardy@lacity.org" <cally.hardy@lacity.org>

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Westwood South of Santa Monica Blvd Homeowners' Association  
P.O. Box 64213, Los Angeles, CA 90064  
wssmhoa.org • info@wssmhoa.org



February 15, 2021

Los Angeles City Planning Dept.  
Attn: Cally Hardy, City Planning Associate  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012  
VIA EMAIL: [housing.element@lacity.org](mailto:housing.element@lacity.org) / cally.hardy@lacity.org

Re: Case No. ENV-2020-6762-EIR / CPC-2020-1365-GPA

Dear Ms Hardy:

On behalf of the constituents of Westwood South of Santa Monica Blvd. Homeowners Association (WSSM), I wish to submit the following comments in response to the Notice of Preparation and Scoping Meeting for the Environmental Impact Report to be prepared for the Citywide Housing Element 2021-2029 Update and the Safety Element Update. WSSM represents an area that is bounded by Pico and Santa Monica Blvds. on the south and north, and by Beverly Glen and Sepulveda Blvds. on the east and west. We have approximately 3800 single family and condominium homeowners in our area, and there is also a significant renter's population in multi-family housing properties located primarily on Beverly Glen Blvd. Our community lies entirely within CD 5 and within the boundaries of the Westside Neighborhood Council and the West Los Angeles Community Plan.

These comments are based upon a review of the Notice of Preparation of a Draft Environmental Impact Report and Notice of Scoping Meeting dated January 13, 2021 (NOP), the January 2021 Initial Study (IS) prepared by Rincon Consultants Inc., and Scoping Meeting conducted by the Planning Department on the January 28, 2021. The NOP requests identification of environmental issues, environmental impacts, and information that should be considered and analyzed in the EIR for the Housing Element Update. The Planning Department's NOP defines the "Housing Element Update" or "Project" to include the Housing Element 2021-2029 Update, the Safety Element Update, and rezone program. Reference to those terms are used in this letter to include all those items. The IS lays out the potential environmental impacts to be studied in the EIR. The purpose of this letter is to respond to the NOP and the IS, in order to help assure that the Project EIR adequately analyzes and assesses potential significant environmental impacts.

It should be noted that throughout the Initial Study there are references to a proposed draft Housing Element (DHE), but we are not aware that any such draft has as yet been made available to the public for review, and the IS does not include the actual draft Housing Element document. The complete absence of any proposed text of the DHE



makes meaningful public comment on potentially significant environmental impacts extraordinarily difficult at this stage. Without an opportunity to review the DHE it is not possible for us to ascertain potential significant impacts that may arise from the adoption of the DHE. The California Office of Planning and Research properly recognizes an EIR for a general plan element update will not provide meaningful information if it is prepared before actual policy language is developed. Accordingly, the EIR scoping process should not be concluded until the public is afforded a reasonable opportunity to review the DHE and provide additional comments concerning the scope of the EIR, as any environmental review of the Project without a DHE will render the process incomplete and inadequate.

I have personally written to Mayor Garcetti's office to request that he contact Governor Newsome to seek an extension on the deadline for the preparation of the Housing Element citing the inappropriate expectation that a city can simultaneously write their Housing Element while doing their DEIR document. (I understand that only the Governor or an act of the Legislature can change the deadline due date.) I raised this issue at the recent Westside Regional Alliance of Councils Executive Committee meeting (WRAC). Given the pandemic and its impacts, the number of new tasks required to be included in the creation of the Housing Element coupled with delays in confirmation of goals all combine to make a strong case that this process needs to take a brief time out so that the deliberation that an 8-year housing document deserves can be made. Rushing to meet the State's deadline without having ample time to consider and to analyze the impacts that the current pandemic will have on the ways that people live, work and commute is folly. After the draft Housing Element is released, a revised NOP should be circulated that provides for another round of NOP responses by community members and responsive agencies once Project documents have been updated to include the DHE to ensure that a thorough environmental analysis may be performed.

WSSM believes and agrees that each potentially significant environmental impact identified in the IS must be thoroughly and objectively analyzed and evaluated so that the City and the public will have an honest assessment of the Project's impact upon the environment. In addition, we believe that the EIR should specifically analyze and evaluate the topics specified below relative to each subject matter proposed to be covered by the EIR. We believe that the following areas should be particularly noted for examination in the DEIR:

**Urban Tree Canopy:** Assumptions in the Initial Study and draft concepts of the Housing Element are based upon continued densification of the most urbanized areas based upon the City of Los Angeles CTAC/HCD Opportunity Zones, TOC zoning and transit priority areas. Trees are an enormous ecological resource that helps improve air quality and reduce greenhouse gases and heat island effect. The loss of urban tree canopy throughout the City of Los Angeles with increased urbanization and densification of housing that would occur with the nearly 500,000 housing units to be



added to the City based upon the City's RHNA allocation will have potentially significant impacts to biological resources, air quality and greenhouse gases. This will potentially occur both on private property and in some cases in City parkways/sidewalks. The discussion and analysis in the biological resources section in the IS/initial study is limited to a heritage trees and the Protected Tree Ordinance and replacement ratios for those trees. Loss of all trees has a much broader impact as mentioned above and needs to be studied not just for heritage trees. Increased urbanization and densification of housing development as will be proposed in the Housing Element will reduce pervious surfaces and landscaped areas on private property whether it is single-family residences with the addition of ADU's or small commercial buildings on commercial corridors that frequently do not have building footprints that occupy entire lots being replaced with mid-rise to high-rise residential and mixed-use residential development that typically occupies virtually and entire parcel of land with housing built on top of a parking podium (whether at grade, subterranean or semi-subterranean.) We see repeatedly that when underground structures cover an entire lot, it is impossible for any trees to be planted and to survive as there is nowhere for their roots to grow and develop. Furthermore, such construction also endangers the mature trees on adjacent lots as the construction damages and/or destroys the root systems of otherwise thriving healthy trees that provide privacy, shade and the added benefits of our urban forest.

Correspondingly, loss of the urban tree canopy means potentially significant impacts to birds with the reduction in trees that provide safety and nesting opportunities for birds. Mitigation measures must be required and Municipal Code requirements must be established that require tree replacement for loss of trees. Additionally, loss of mature trees should require similar replacement ratios (4 to 1) to the Protected Tree Ordinance requirements for Heritage trees. Replacement trees should be a minimum of 24-inch box size trees with a larger minimum size for large mature tree replacement. Further consideration should be given to mandating replacement with shade trees preferably not deciduous trees. Palm trees and similar species that provide no shade or reduction in greenhouse gases should not be acceptable replacement trees. Palm trees are frequently chosen by developers for housing projects and they do not contribute to GHG reduction, shade, reduction in heat island effect and opportunities for bird habitat. If trees are not required to be replaced, the impacts to air quality and increase in greenhouse gases will be even greater.

These issues must be analyzed in the EIR and mitigation measures be developed for the loss of any trees as discussed above as they relate to Section 4e (Biological Resources), Sections b, c, d (relating to Air Quality), and Section a (Greenhouse Gas analysis).

**Land Use and Planning** - The IS concludes the Project could potentially cause a significant environmental impact due to a conflict with other land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.



The EIR should specifically address the potential impact upon Very High Fire Hazard Severity Zones (VHFHSZ) if any such zones are included within the Rezoning Program for possible increased housing density. Finally, the EIR should separately analyze the cumulative effects of the Project's land use designations, policies and programs on the environment for each of the City's 35 separate community plan areas, and identify to the State each of City's 800,000+sf of surplus property parcels controlled by the Chief Administrative Officer.

**Housing and Population.** The IS indicates that the Project goal is to relieve overcrowding and the existing housing cost burden, and to provide housing for the existing unsheltered and unhoused population. The IS also recognizes that the Project could, never the less, result in additional population growth beyond what is forecast in the Regional Housing Needs Assessment (RHNA) for the City, potentially creating a significant environmental impact. The EIR should analyze the potential impact of such additional population growth for each community plan area within the Rezoning Program. The NOP states the objectives of the Project solely from the supply side of the housing issue. The EIR should analyze and describe the existing and projected vacancies with respect to all types and economic levels of housing in the City, and whether more housing that merely creates more vacant units will meet the Project's objectives, or whether, and to what extent, funding to subsidize the cost of housing is necessary. The EIR should analyze whether the objectives of the Project should be to merely create more housing units, or whether there should be an objective phrased in terms of housing the projected population. It appears the EIR will examine the impacts of an increase of approximately 100,000 additional residential units, while it appears that the required increase in residential units for the 2021-2029 Housing Element period will be in the neighborhood of 50,000 additional units. Will the Housing Element, when implemented, effectively double the number of additional residential units required by RHNA?

#### **Public Services:**

**Fire Services.** The IS indicates the Project could have a potentially significant impact by placing an unanticipated burden on fire protection services or affecting response times or service ratios. The EIR should specifically address the potential impact of the Project upon providing fire protection services in the flatlands where traffic is often an impediment to speedy response time and in VHFHSZs, particularly if the increase in housing units outpaces the ability of the City to expand fire services.

**Police Services.** The IS indicates the Project could have a potentially significant impact by placing an unanticipated burden on police services or affecting response times or service ratios. The police budget is presently being cut, leaving the community with under-funded first responders. The EIR should specifically address the potential impact of the Project upon providing police services should the increase in housing units outpace the ability of the City to expand police services.



**Schools.** As part of the EIR's study of the impact of increased density on public schools, how will the EIR address specific differences within the City -for example, schools with enrollment under capacity vs. schools at, or, over-enrolled? Our community has been identified as having rich transit and job opportunities in addition to having good educational resources. However, our local charter elementary school has been over-enrolled for some time now, has already placed bungalows on the school grounds and has no land for expansion. How is it that the local school will be able to absorb new families and students that come into the area? As the school plays a key part in building a sense of community what can we expect? Other nearby schools are also at or near enrollment capacity. Moving school boundaries to schools at greater distance is not viewed as a favorable option – both from the aspect of having children able to walk or ride their bikes to schools and being able to form friendships with others they can readily access, but also from a public safety point of view. The last time a boundary change was proposed for our local elementary school, the change would have placed local children in a school on the other side of the 405 freeway which, at peak afternoon rush hour would have meant that the school was nearly inaccessible to parents picking up their children. (Walking home from that location would not have been a safe option for most children.) Will the State provide funding for the construction of entirely new schools (with heights above current limits? Are we to expect that school yards for children to play on are a thing of the past?

**Parks.** As part of the EIR's study of the impact of increased density on the public parks and recreation system, how will the EIR address specific differences within the City –by each of the different Community Plan areas. How will the current status of neighborhoods identified as “park poor” be incorporated in land use decisions to be made? As the push for new housing intensifies and density increases, what measures are being taken to assure that adequate open space is provided as well and increases as population increases. Additionally, the provision of open space is not enough. Long range maintenance and upkeep of parkland must be considered as part of impacts of added housing and population density. How will parks and open space be evaluated and related to Air Quality, Recreation and Public Services?

Increased urbanization and densification of housing development will have potentially significant impacts to air quality, recreation and public services. Development impact fees have not historically proven to provide sufficient resources in the City of Los Angeles to offset loss of park and open space and/or to increase these resources particularly when considering the potential of nearly half a million new housing units during the upcoming planning period. Additional mitigation measures should be considered and implemented to provide land and/or on-site amenities open to the larger community to offset some impacts. This should be applicable particularly to larger scale projects. The City of Los Angeles has deficient ratios of park acreage per 1,000 persons throughout the City including in the West Los Angeles area. Although there are two primary parks located within the Westside Neighborhood Council boundaries, these resources are not sufficient for the population in the area and the increased housing



potential in the Transit Oriented Communities (TOC) zoning along with other up-zoning that may occur to accommodate the sufficient sites criteria. This issue needs to be analyzed thoroughly in the EIR.

**Aesthetics – Light and Glare.** We believe that light and glare (Aesthetics Section 1) has the potential to significantly increase light and glare and that the initial study checklist should be modified and that it should be studied further in the EIR. The analysis does not adequately address the impacts of adding nearly a half million housing units to the City in the next 8 years.

**Transportation.** The Initial Study identifies a number of circumstances where the Project could result in increased trips compared to existing conditions. Trips generated as a result of project development have the potential to impact intersection and roadway segments throughout the City. The proposed project may also conflict with applicable plans and policies addressing the circulation system. The EIR should analyze the potential traffic impacts the Project will have upon areas within the Rezoning Program. While the State and City currently focus on measuring traffic impacts via “Vehicle Miles Traveled” (VMT), it is becoming increasingly clear that one can demonstrate a reduction in VMT while still resulting in an increase in congestion from added construction/density. This must not be ignored, particularly in key locations where congestion might have a negative impact on access to transit.

In connection with studying impacts on transportation, how will the EIR identify and address neighborhoods that are already unable to accommodate their existing density, i.e., with already established unacceptable service level burdens on roadways? How will the EIR account for potential unbuilt capacity in other areas, as an alternative to impacting existing communities, such as along new major transit options located in light industrial or industrial areas? How will the EIR analyze environmental impact on transportation level of service with increased density within 0.5 mile of impacted roads and intersections? How will the EIR study the impact of converting industrial zoning to mixed use/residential within 0.50 mile of mass transit?

We request that thorough analysis be conducted for the impacts of emergency access. Many of the residential neighborhoods along the Exposition Light Rail Corridor have experienced reduced ingress/egress as a result of the implementation of traffic measures and increased cut-through traffic (pre-pandemic). These issues need to be carefully evaluated as to their impacts with requirements for additional housing capacity based upon existing up-zoning (TOC) and any potential future up-zoning that could occur through the West Los Angeles Community Plan update or by the City in response to proposed future re-zoning to implement the Housing Element policies and goals.

Other related concerns that should be evaluated is the practice of the Building Department to waive street dedication requirements with housing and mixed-use





development projects that sometimes result in maintaining streets that are substandard in roadway width that limits emergency access and can create safety hazards and traffic bottlenecks. While appropriate in areas where future street widening is not a realistic option (and creates mismatched sidewalks, curbs and other negative impacts), in other instances it is an unsound practice pointing out the need for consistency in policy and implementation. Impacts of these practices should be evaluated in the EIR and prohibited as part of implementation of new housing development. (The impacts of street widenings on tree canopy is an additional associated issue.)

**Wildfire.** While our community is not located in a Very High Fire Hazard Severity Zone, our neighbors to the north in the hillsides of West Los Angeles, Hollywood, Brentwood and Pacific Palisades are and they face significant risk from the growing dangers of wildfire due to drought and climate change. The IS concludes that the Project will have less than significant impacts upon risks associated with wildfires. This conclusion is based upon an expectation that the Project would not introduce any features, policies or procedures that would in any way encourage housing development in VHFHSZ. Unless the Project will exempt all VHFHSZ from the Rezoning Program, the EIR should analyze the impact it will have upon risks associated with wildfires. Accordingly, the EIR should analyze and describe whether the Project should specifically state that no “Opportunity Sites” are appropriate in VHFHSZ, and study wildfire in the event the Project does not state that no “Opportunity Sites” are appropriate in VHFHSZs. To the extent the Housing Element seeks to adopt any increased housing in VHFHSZ, how can that be accomplished without a potentially significant negative safety and/or environmental impact? In studying wildfire, the EIR should address the many topics that relate to wildfires including: evacuation routes and the capacity, safety, and viability of existing and potential evacuation routes in Very High Fire Hazard Severity Zones, along with the availability of resources necessary to support those evacuation routes. We will defer to our hillside neighbors to detail all the EIR topics related specifically to hillside development and the need to acknowledge the dangers of wildfire to those areas.

**Utilities and Service Systems.** As part of the EIR’s study of the impact on utilities and service systems, will the EIR analyze the impact of density on the infrastructure within each community plan? How will the EIR take into consideration substantial differences in infrastructure capacity. There are already areas in the City and in our community where there are clear indications of an insufficient capacity to serve existing population density. There are blocks where transformer failures / power outages have been a repeated occurrence and where water main breaks have been experienced on multiple occasions (with the DWP having to pay ratepayers for damage repairs). Will the EIR analyze the impact of density on the infrastructure within each community plan? How will the EIR compare and contrast the commercial grade infrastructure located in industrial zones versus infrastructure capacity in residential zones when allocating RHNA units. How will the City assess infrastructure capacity and



update such information on a regular basis? What mechanisms exist (and should exist) to create a comprehensive and coordinated assessment of infrastructure capacity? Allowing developers to decide where added density is to be built without having an adequate and up-to-date assessment of infrastructure capacity/capability is a recipe for disaster.

In an EIR for a large nearby housing development, it was mentioned in the document that the project would likely use up all the remaining sewage capacity in the area. While that EIR was completed some years ago and the near 600-units are being occupied, we have never seen mention of that sewage capacity issue raised again.

While LA residents have proven to be diligent with their water conservation efforts, added density will bring additional demands for water resources that may not exist locally, regionally or even statewide. How will the relationship between water resources and population growth/density be addressed?

**General –EIR.** The IS states on page 11 that “the City’s Inventory of Sites will target identifying a capacity of at least 501,642 units.” The State’s General Plan Guidelines states: “The EIR must describe the existing local and regional physical environment, as they exist when the notice of preparation of the EIR is published, emphasizing those features that are likely to be affected by the plan and the environmental constraints and resources that are rare or unique to the area (CEQA Guidelines §§ 15125(a), 15125(c)). It should describe existing infrastructure, such as roads, water systems, and sewage treatment facilities, along with their capacities and current levels of use.” Since the effects of such a large number of units would reverberate throughout many other parts of the General Plan, the EIR should analyze to what degree the Project will increase: water demand; road demand; school demand; power and other utility demand; sewage treatment demand; and the infrastructure in general, and the potential impacts from building the housing prior to supplying the required infrastructure.

The EIR should also include consideration of policies already adopted by the City such as: L.A.’s Green New Deal, the City’s Local Hazard Mitigation Plan, “Resilient Los Angeles” plan, L.A.’s 2020 Biodiversity Report, the Floodplain Management Plan (2020 draft).

**Other matters raised in response to the NOP.** In addition to the matters identified above for study in the EIR as a result of our review of the IS, the NOP also requests that “information” be identified for consideration and analysis in respect of the EIR. With respect to that request, we note the following:

---The State’s exaggerated targets for additional housing that will be incorporated in the 2021-2029 Housing Element do a great disservice to this process and to building credibility in the process. Decades of overachieving production of market-rate housing



has not reduced housing costs for lower income households or met the needs of our “missing middle” workforce. Legislation (such as SB 1818 when first adopted) sought to create new affordable housing but, in fact, contributed to an acceleration of the demolition of existing affordable housing. The state has shown, with decades of data, that it cannot dictate to the market. Supply and demand forces operate outside of government’s purview. International financial market forces as well as speculative influences play a role in how the housing market operates. Market rate housing will be produced in California so long as there is a profit to be made. However, it is the state’s responsibility is to take care of those left behind in the market’s wake. Based on housing permit progress reports published by the Dept. of Housing and Community Development in July 2020, cities and counties in the four most populous regions continue to strongly outperform on the state’s assigned market-rate housing targets, but fail to achieve even 20% of their low-income housing target. In the Bay Area where permit records have been kept since 1997, there is evidence that this housing permit imbalance has propagated through decades of housing cycles. Accordingly, the EIR should study and explain how the goals, policies, programs, and procedures of the Housing Element Update will encourage affordable housing compared with market rate and luxury housing.

SB-828 wrongly assumed overcrowding and cost-burdening had not been considered in Department of Finance projections of housing need. The bill sought to redress what it mistakenly thought had been left out by requiring regional planning agencies to report overcrowding and cost-burdening data to the Dept. of Housing and Community Development. Unknown to the authors of SB-828, the Department of Finance (DOF) has for years factored overcrowding and cost-burdening into their household projections. These projections are developed by multiplying the estimated population by the headship rate (the proportion of the population who will be head of a household). The Department of Finance (DOF), in conjunction with the Department of Housing and Community Development (HCD), has documented its deliberate decision to use higher headship rates to reflect optimal conditions and intentionally “alleviate the burdens of high housing cost and overcrowding.” Unfortunately, SB-828 has caused and required the state to double count these important numbers. The EIR should study and explain to what extent the goals, policies, programs, and procedures of the HE are based on, or the result of, the double counting explained above. (For further information, go to the Embarcadero Institute study: <https://embarcaderoinstitute.com/wp-content/uploads/2020/09/Double-counting-in-the-Latest-Housing-Needs-Assessment-Sept-2020.pdf>) The EIR should propose an Alternative that does not include such double counting. SB-828 wrongly assumed a 5% vacancy rate in owner-occupied housing is healthy which contradicts Government Code 65584.01(b)(1)(E) which specifies that a 5% vacancy rate applies only to the rental housing market). The EIR should study and explain to what extent the goals, policies, programs, and procedures of the HE are based on, or the result of, assuming that a 5% vacancy rate in existing



and projected owner-occupied housing is desirable. The EIR should specifically address the goals, policies, programs, and procedures in the HE that will address the need for affordable housing, and whether and how up zoning will address that need. The EIR should specifically address the goals, policies, programs, and procedures in the Housing Element Update that will address the need for affordable housing, and whether and to what extent local, State, and Federal funding is assumed and will be available to support that affordable housing (funding analyzed from both the supply side and demand side). The EIR should include an Alternative, or at least an explanation, of the housing need in Los Angeles based on a jobs-to-housing ratio of 1.5 (optimal benchmark used by planning agencies), after estimating job growth by 2030.

The NOP states that the rezoning program will prioritize opportunities for rezoning or development incentives in areas that are located in a Transit Priority Area, near major job centers, and in higher resource areas. The EIR should define and thoroughly explain the criteria for a Transit Priority Area, a major job center, and a higher resource area. The EIR should explain how an objective of mandating “affordable housing” in an area of the City that is more expensive because it has more natural resources and amenities is consistent with our market-driven, capitalist system. It should also address the impacts on land value when land is rezoned to allow for added density and whether this addresses housing needs or exacerbates housing costs. The EIR should thoroughly explain the timing and procedures behind the statements on page 19 of the IS that discuss the inclusion in the HE of a program to rezone for 93,230 additional units in light of: (i) the Housing Element needs to be updated in 2021, (ii) the Rezoning Program through updates to Community Plans needs to be done by 2024, (iii) many Community Plans have no chance of being updated by 2024, (iv) other Community Plans have already been updated without regard to the upcoming HE, and (v) the actual number of additional units being required by RHNA are substantially less. The EIR should explain how the “inventory of potential sites for rezoning” referred to on page 23 of the IS is consistent with an intention to not tie the hands of communities subsequently updating their Community Plans. We request, as part of this EIR scoping process, that the City undertake to lay out a clear timeline and sequence respecting the updating and eventual implementation of the Housing Element throughout the many diverse neighborhoods that make up Los Angeles, including the incorporation of up zoning into each of the City’s 35 Community Plans. In addition, we request that the EIR address how the City will incorporate its own surplus inventory of 800,000 sf of infill for up zoning.

The impacts of climate change cannot be ignored as they impact increased temperature, reduced precipitation, seal level rise, reduced water supply, wildfire risk, public health impacts of heat and air quality, and coastal erosion. These threats are noted in the California Emergency Management Agency’s [California Adaptation Planning Guide](#) as the most likely climate change impacts in the South Coast climate



impact region. The EIR must include consideration of these potentially significant environmental impacts in the appropriate analysis categories.

The Initial Study provided no discussion of possible alternatives that may be studied in the EIR. It is difficult to provide input regarding appropriate Alternatives besides the “No Project” Alternative required by CEQA without a draft Housing Element as a basis for any recommendations. Therefore, WSSM would like to reserve the right to comment regarding Alternatives to the EIR once the draft sites inventory analysis and draft Housing Element is complete and publicly released.

Yours sincerely,

A handwritten signature in blue ink that reads 'Barbara Broide'.

Barbara Broide  
President, Westwood South of Santa Monica Blvd. HOA

cc: Councilmember Paul Koretz, CD 5  
Daniel Skolnick, Planning Deputy, CD 5

# Appendix B-3

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Individuals



Housing Element &lt;housingelement@lacity.org&gt;

## Re: Staff Presentation from Housing Element Scoping Meeting Now Available Online | La Presentación del Personal de la Reunión de Alcance del Elemento de Vivienda Ya Está Disponible en Línea

2 messages

Tallan Acalin [REDACTED]  
To: housingelement@lacity.org

Fri, Feb 5, 2021 at 11:51 AM

Attn: To the City Housing Planner for the County of Los Angeles

With the initial cost of land (here in L.A. County there is a 1600 acre parcel in Agua Dulce, Agua Dulce, CA 91390 (Los Angeles County) that can be subdivided into 1/10th acre lots, [ like in many San Pedro Lots]) & the varying costs of all New Infrastructure, it would cost approximately \$20,000.00 to \$25,000.00 CAN buy a Prefabricated 2-3 bdrm. home (loaded in the Picture) with 2KW of Solar power, 2/600W wind turbines, 3 days of Battery Backup Power with a few other components. (They can even have 1 of the RED CARS BELOW 25 MPH Max speed!).

The infrastructure will include Water, Gas, Phone, Electric grid\*, Sewer, Cable optics, Roads, Signage and green powered street lights\*,

These Prefabricated Houses Can even be made to Float (by adding pontoons under the House) incase of being built in or near a Flood Plain thus Negating the rebuild costs after Excessive Rainfall Upstream, and Downstream Flooding or the backing up of storm drains that empty into the Ocean like what has Happened within the last decade in many South-Eastern states { or the Levee break in New Orleans during Katrina }

The above cost of \$20,000.00 to \$25,000.00 per Prefabricated House could be brought down further as this amount was arrived at the cost of housing 100,000 Homeless People { Veteran, Seniors, Families with school age children} and something for those that don't fit those 3 criteria] here in Los Angeles, California. Only.... And I have sent emails to many city council members & the County has pushed it aside for the last 5+ years.

I even tried to start a Corp. back in April 2020 ( A Druidic Way, Inc. )....to do the above ...But can not find anyone to Fund the Corporation for this Project!

Which everyone complains about, and Noone is willing to Help make it go away either with Absurd Qualification & Overall housing Regulations or with statements like you are Denied because you haven't been in business for more than 2 years or you don't have collateral so we can't give you a Startup Loan !

Which is a 1 time Expense instead of FISTFULS OF TAXPAYER DOLLARS EVERY YEAR, to groups that only house them 2 or 3 nights a week & Then with the standard GA Repayment paperwork signed by most people receiving GA or Food Stamps you can Bill those that move into 1 of these units . on a Rent to Own basis..until they're paid for ( \$20,000.00 to \$25,000.00 ) thus creating Permanent Home owners that have to pay Property taxes and become Productive members of Los Angeles, California !!!

Too bad this email won't be read by those people that need to read it .... so that they can end the Lawsuit against L.A. as a federal Judge holding court at the homeless women's shelter on 2/4/2021 !

Signed by:  
Tallan J. Acalin

There are many styles of Prefabricated housing that can be Purchased in Bulk via Wholesale companies & shipped to Los Angeles !  
which I have already searched for and Saved.

On Fri, Feb 5, 2021 at 10:04 AM Los Angeles City Planning <housingelement@lacity.org> wrote:



*Para ver en español, desliza hacia abajo*

## Dear interested parties,

Thank you to those of you who joined us on January 26th and 28th at the Public Scoping Meetings for the Housing Element Environmental Impact Report (EIR). The EIR is being prepared by Los Angeles City Planning as part of the [Plan to House LA](#).

The recording of the staff presentation from the Scoping Meeting is [now available online](#).

As a reminder, the review and response period for the NOP is from January 13, 2021 through February 15, 2021. Pursuant to CEQA Guidelines Section 15082(b), written responses to this NOP must be provided by no later than 5:00 p.m. on Monday, February 15th in order to be considered for the record. Additional information regarding the proposed project, and how to provide comments, is provided in the [NOP](#).

For more information about the Housing Element 2021-2029 Update, please visit [planning4LA.org/Plan2HouseLA](http://planning4LA.org/Plan2HouseLA). To provide feedback on the draft Plan concepts and potential programs please take the [Concepts Survey](#).

## Estimadas partes interesadas:

Gracias a todos los que nos acompañaron el 26 y 28 de enero en las Reuniones de Alcance Público para el Informe de Impacto Ambiental (EIR por sus siglas en inglés) del Elemento de Vivienda. El Informe de Impacto Ambiental está siendo preparado por el Departamento de Planeación de La Ciudad de Los Ángeles como parte del Plan to House LA.

La grabación de la presentación del personal de la Reunión de Alcance ya está disponible en línea.

Acuerdense de que el periodo de revisión y respuestas para el Aviso de Preparación (el NOP por sus siglas en inglés) es del 13 de enero al 15 de febrero del 2021. De conformidad con la Sección 15082(b) de las pautas de la CEQA, las respuestas escritas al Aviso de Preparación deben ser enviadas no más tarde de las 5:00 p.m. del lunes 15 de febrero para ser consideradas parte del expediente del proyecto. El Aviso de Preparación incluye información adicional sobre el proyecto propuesto y sobre cómo usted puede proveer sus comentarios.

Para obtener información sobre la Actualización del Elemento de Vivienda 2021-2029, visite el sitio [planning4LA.org/Plan2HouseLA](http://planning4LA.org/Plan2HouseLA). Para proveer sus comentarios sobre los conceptos



City of Los Angeles Mail - Re: Staff Presentation from Housing Element Scoping Meeting Now Available Online | La Presentación del Per... del Plan de Vivienda inicial y programas potenciales, por favor tome la Encuesta de Conceptos.

**Sign up** to receive citywide planning updates by email.



In partnership with Housing + Community Investment Department

*En asociación con el Departamento de Acción Social + Vivienda*

Los Angeles City Planning | [Planning4LA.org](http://Planning4LA.org)



Los Angeles City Planning | [200 N. Spring St](#), Room 525, Los Angeles, CA 90012

Unsubscribe [\[redacted\]](#)

[Update Profile](#) | [Customer Contact Data Notice](#)

Sent by [housingelement@lacity.org](mailto:housingelement@lacity.org) powered by



**2 attachments**



**600 Sq. Ft. Raised House.jpg**  
396K



**mini 2 seats electric cars for adult.jpg**  
384K

**Housing Element** <[housingelement@lacity.org](mailto:housingelement@lacity.org)>  
To: Tallan Acali [\[redacted\]](#)

Mon, Feb 8, 2021 at 11:50 AM

2/16/2021

City of Los Angeles Mail - Re: Staff Presentation from Housing Element Scoping Meeting Now Available Online | La Presentación del Per...

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team  
[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Katherine Aker [REDACTED]

Mon, Jan 25, 2021 at 1:06 PM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

It is disappointing that Planning does not intend to pursue the equitable distribution approach in the housing element update. Planning recently released an Initial Study for the housing element update which contains numerous inadequacies that merit serious concern. Planning's analysis suggests that the City can achieve over 80% of its RHNA target with no significant zoning or policy changes, and that the remaining 20% can be accommodated via already-in-progress community plan updates and changes to the City's Density Bonus program.

The facts do not support these conclusions, and that Planning's "status quo" proposal is flawed for the following reasons:

Planning's "status quo" proposal fails to affirmatively further fair housing, which is required under state law. By planning for most housing growth on parcels where multifamily development is already allowed, the City is steering housing opportunities away from the 75% of the City's residentially-zoned land that is restricted to single-family housing only. This perpetuates historic patterns of segregation and exclusion, and continues to push housing opportunities for lower-income households towards lower-income neighborhoods.

Planning anticipates that under current zoning, Los Angeles can expect to build 307,000 more homes between 2022 and 2029. However, Los Angeles only permitted about 114,000 homes during the eight-year period ending in 2019, leading to a net increase of 99,000 homes during that time. Planning offers no convincing rationale for why they expect housing production to nearly triple without significant policy or zoning changes.

Planning's anticipated site inventory, where they expect the development of 307,000 more homes to occur, likely contains a large number of parcels zoned for multifamily residential development. This suggests that a large number of existing rent-stabilized housing units would be redeveloped under Planning's "status quo" approach, increasing lower-income renter households' risk of displacement.

Planning anticipates accommodating 93,000 homes primarily through a series of community plan updates that are already in progress. However, many draft community plan updates highlighted in the Initial Study, including updates for the Westside, Hollywood, Southwest Valley, Southeast Valley, and Purple Line Transit Neighborhood Plan, are unambitious and do little to create significant amounts of new housing capacity. This approach also allows high-resource neighborhoods whose community plan update processes have not yet started, like Brentwood-Pacific Palisades and Westwood, to avoid zoning reforms that are necessary to accommodate the City's RHNA goal. This is unfair.

I strongly oppose Planning's "status quo" approach to the housing element update, which would do little to meaningfully address unaffordable housing costs, lengthy commutes, poor air quality, displacement of lower-income renters, and segregated neighborhoods. Fortunately, with eight months remaining until housing element updates are due, there is still time to change course and create an equitable, transformative housing element. I urge you to instruct the Department of City Planning to take this important step for Los Angeles' future.

Personally sent by Katherine Aker using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Katherine Aker

10402 McClellmont Ave Tujunga, CA 91042-1816  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:43 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Josh Albrektson [REDACTED]

Mon, Jan 25, 2021 at 1:13 PM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Personally sent by Josh Albrektson using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Josh Albrektson

1123 Windsor Pl South Pasadena, CA 91030-3231  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:44 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Chase Andre [REDACTED] &gt;

Sat, Feb 13, 2021 at 12:08 PM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Planning's anticipated site inventory, where they expect the development of 307,000 more homes to occur, likely contains a large number of parcels zoned for multifamily residential development. This suggests that a large number of existing rent-stabilized housing units would be redeveloped under Planning's "status quo" approach, increasing lower-income renter households' risk of displacement.

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Personally sent by Chase Andre using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Chase Andre  
26351 Marsala Way Mission Viejo, CA 92692-5231  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Tue, Feb 16, 2021 at 10:32 AM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]





Housing Element <housingelement@lacity.org>

---

## Housing Element Stakeholder Response

2 messages

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coni acos <[REDACTED]>  
To: HousingElement@lacity.org

Tue, Feb 16, 2021 at 5:28 PM

See attachment.

Thank you,  
Connie

---

 **Housing Element Stakeholder Response .pdf**  
51K

---

Housing Element <housingelement@lacity.org>  
To: coni acos [REDACTED]

Tue, Feb 16, 2021 at 6:35 PM

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

On Tue, Feb 16, 2021 at 5:28 PM coni acos [REDACTED] > wrote:

See attachment.

Thank you,  
Connie

## LA Citywide Housing Element 2021-2029 Update (Initial Study) Environmental Checklist (Biological Resources), Page 54-55

### Stakeholder Response

By Connie Acosta, [REDACTED]

02/16/21

### Potential Significant Impact

*d. Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?*

Elysian Park sits in the easternmost part of the Santa Monica Mountain Range bordering the LA River on the east and downtown Los Angeles on the south. Based on the new building types that have been replacing the prior buildings, City Planning has not considered the wildlife, and the flora and fauna of the mentioned natural corridors.

This proposal requests that City planning consider the bigger environment when issuing planning entitlements to multi-floor residential projects in the hills of Echo Park, within 2,000 ft. from Elysian Park, and on the northern slope of Sunset Blvd between Beaudry Street and Douglas Street in City District 1. Most of the older homes and buildings took the environment into account. For example, the Stires Staircase Bungalow Courts at 1251-1259 West Sunset Boulevard were built on a carefully graded hillside in 1922 as separate individual units.

This site was the precursor to the Small Lot Subdivision model (while the individual rentals were owned by one owner) and Transit Oriented Communities (TOC) in the sense that the single-family homes were designed with no garages, driveways or vehicular access, and the 112 steps connected the 10 small homes to the transit corridor (the trolley car).

These bungalows were designed with plenty of open space with trees and greenery that have served as a bird sanctuary for local wildlife movement for about a century.

Open space is an important housing element that has been ignored by City Planning for decades. When building, please consider open space in the Echo Park and Elysian Park areas to improve wildlife migration.



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Thomas Atlee &lt;[REDACTED]&gt;

Tue, Jan 26, 2021 at 7:34 AM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Personally sent by Tommy Atlee using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Thomas Atlee  
147 N Norton Ave Los Angeles, CA 90004-3912  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:52 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

---

**CPC-2020-1365-GPA ENV 2020 6762 EIR**

2 messages

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[REDACTED] > Mon, Feb 15, 2021 at 4:18 PM  
Reply-To: [REDACTED]  
To: "housingelement@lacity.org" <housingelement@lacity.org>, "Cally.Hardy@lacity.org" <Cally.Hardy@lacity.org>

Dear Ms. Hardy,

I am requesting that the environmental impact of the removal of trees for development be examined in the EIR. Tree removal information for development is tracked by the UFD and the BPW and in addition Angelenos for Trees has compiled data regarding City tree removal requests which they can supply you with.

I was disheartened to hear at your scoping meeting last month that existing trees and tree canopy were not included in the Topics to be Analyzed in the EIR on page 17 of your presentation. It is very disingenuous on one hand to hear our Mayor boosting his support for increasing tree canopy in Los Angeles, which is sadly lacking, while at the same time not doing all we can to preserve what little we have. The false hope of "replacing" mature trees with new plantings or worst trees in planters, does not mitigate the loss of tree canopy and with it the lowering of climate temperature so desperately needed in our city.

You know that we will never "replant" our way out of the loss of tree canopy especially at the rate we are losing it. The over 100 new plantings along Sepulveda Blvd and Sunset Blvd are a perfect example of the sorry truth of many of the attempts to enhance our parkway trees that are not properly cared for and die. The loss of trees on private property is a problem that could be addressed with better incentives that are not mild fines or inadequate replacements. Please consider the not so distant future of our city's rising heat due to climate change crisis and add the environmental impact of removal of trees for development to the EIR for this case, and every like case.

Sincerely,

Teri Austin  
4245 Laurelgrove Ave.  
Studio City, Ca.  
91604

---

**Matthew Glesne** <matthew.glesne@lacity.org> Tue, Feb 16, 2021 at 10:02 AM  
To: [REDACTED], Housing Element <housingelement@lacity.org>

We received. Thank you.  
Matt

On Mon, Feb 15, 2021 at 4:20 PM <[REDACTED]> wrote:  
Dear Mr. Glesne,

I understand this is the last day for Ms. Hardy to receive correspondence for this case so I assume you will be forwarding this to her as I wish my email to be recorded as having arrived before 5 pm today, February, 15th.

Thank you  
Teri Austin  
[Quoted text hidden]

--

**Matthew Glesne**



Preferred Pronouns: He, Him, His

Senior City Planner

**Los Angeles City Planning**

200 N. Spring St., Room 750

Los Angeles, CA 90012

Planning4LA.org

T: (213) 978-2666





Housing Element &lt;housingelement@lacity.org&gt;

---

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

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**Peter Avildsen** [REDACTED]

Wed, Feb 3, 2021 at 10:09 AM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

It is disappointing that Planning does not intend to pursue the equitable distribution approach in the housing element update. Planning recently released an Initial Study for the housing element update which contains numerous inadequacies that merit serious concern. Planning's analysis suggests that the City can achieve over 80% of its RHNA target with no significant zoning or policy changes, and that the remaining 20% can be accommodated via already-in-progress community plan updates and changes to the City's Density Bonus program.

The facts do not support these conclusions, and that Planning's "status quo" proposal is flawed for the following reasons:

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Planning anticipates that under current zoning, Los Angeles can expect to build 307,000 more homes between 2022 and 2029. However, Los Angeles only permitted about 114,000 homes during the eight-year period ending in 2019, leading to a net increase of 99,000 homes during that time. Planning offers no convincing rationale for why they expect housing production to nearly triple without significant policy or zoning changes.

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Personally sent by Peter Avildsen using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Peter Avildsen  
161 N Catalina St Los Angeles, CA 90004-4670  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Feb 4, 2021 at 1:57 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,

The Housing Element Team

[Quoted text hidden]





Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Avinoam Bara [REDACTED] &gt;

Mon, Jan 25, 2021 at 5:22 PM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Personally sent by Avinoam Baral using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Avinoam Baral  
425 S Burlingame Ave Los Angeles, CA 90049-4808  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:51 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

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## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Tara Barauskas &lt;[REDACTED]&gt;

Mon, Feb 15, 2021 at 8:48 AM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Tara Barauskas using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Tara Barauskas  
1423 2nd St Ste B Santa Monica, CA 90401-3453  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Tue, Feb 16, 2021 at 10:37 AM

To: Tara Barauskas [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Nancy Barba &lt;[REDACTED]&gt;

Tue, Jan 26, 2021 at 10:32 AM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

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Personally sent by Nancy Barba using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Nancy Barba  
9069 Carson St Culver City, CA 90232-2502  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:53 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

David Barboza &lt;[REDACTED]&gt;

Mon, Jan 25, 2021 at 9:56 PM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

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Personally sent by David Barboza using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
David Barboza  
7239 Comstock Ave Unit C Whittier, CA 90602-1353  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:52 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]





Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Nicole Beaudoin [REDACTED]

Sun, Jan 31, 2021 at 10:29 AM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Nicole Beaudoin using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Nicole Beaudoin  
1616 S Redondo Blvd Los Angeles, CA 90019-5355  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Mon, Feb 1, 2021 at 9:35 AM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

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## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Tom Bellino [REDACTED]

Wed, Feb 3, 2021 at 1:43 PM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

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Sincerely,

Tom Bellino

534 S Coronado St Los Angeles, CA 90057-1816  
[REDACTED]

---

Housing Element <housingelement@lacity.org>

Thu, Feb 4, 2021 at 2:00 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team  
[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Carey Bennett [REDACTED]

Mon, Jan 25, 2021 at 1:20 PM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

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Personally sent by Carey Bennett using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Carey Bennett  
2929 St George St Los Angeles, CA 90027-3025  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:44 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Gary Benjamin &lt;[REDACTED]&gt;

Mon, Feb 8, 2021 at 12:26 AM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

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I strongly oppose Planning's "status quo" approach to the housing element update, which would do little to meaningfully address unaffordable housing costs, lengthy commutes, poor air quality, displacement of lower-income renters, and segregated neighborhoods. Fortunately, with eight months remaining until housing element updates are due, there is still time to change course and create an equitable, transformative housing element. I urge you to instruct the Department of City Planning to take this important step for Los Angeles' future.

Personally sent by Gary Benjamin using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Gary Benjamin  
1046 N Normandie Ave Los Angeles, CA 90029-2445  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Mon, Feb 8, 2021 at 11:36 AM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,

The Housing Element Team

[Quoted text hidden]





Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Carey Bennett [REDACTED]

Wed, Feb 3, 2021 at 2:20 PM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

It is disappointing that Planning does not intend to pursue the equitable distribution approach in the housing element update. Planning recently released an Initial Study for the housing element update which contains numerous inadequacies that merit serious concern. Planning's analysis suggests that the City can achieve over 80% of its RHNA target with no significant zoning or policy changes, and that the remaining 20% can be accommodated via already-in-progress community plan updates and changes to the City's Density Bonus program.

The facts do not support these conclusions, and that Planning's "status quo" proposal is flawed for the following reasons:

Planning's "status quo" proposal fails to affirmatively further fair housing, which is required under state law. By planning for most housing growth on parcels where multifamily development is already allowed, the City is steering housing opportunities away from the 75% of the City's residentially-zoned land that is restricted to single-family housing only. This perpetuates historic patterns of segregation and exclusion, and continues to push housing opportunities for lower-income households towards lower-income neighborhoods.

Planning anticipates that under current zoning, Los Angeles can expect to build 307,000 more homes between 2022 and 2029. However, Los Angeles only permitted about 114,000 homes during the eight-year period ending in 2019, leading to a net increase of 99,000 homes during that time. Planning offers no convincing rationale for why they expect housing production to nearly triple without significant policy or zoning changes.

Planning's anticipated site inventory, where they expect the development of 307,000 more homes to occur, likely contains a large number of parcels zoned for multifamily residential development. This suggests that a large number of existing rent-stabilized housing units would be redeveloped under Planning's "status quo" approach, increasing lower-income renter households' risk of displacement.

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Personally sent by Carey Bennett using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Carey Bennett  
2929 St George St Los Angeles, CA 90027-3025  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Feb 4, 2021 at 2:00 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,

The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

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## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

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**Ann Bickerton** [REDACTED]

Tue, Jan 26, 2021 at 12:00 AM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles is essential to solving Los Angeles' housing shortage.

It must be equitable, promote socioeconomic integration, and take a long term view of Los Angeles' housing needs. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

It is a serious concern that Planning does not intend to pursue the equitable distribution approach in the housing element update. Planning recently released an Initial Study for the housing element update which contains numerous inadequacies that merit serious concern. Planning's analysis suggests that the City can achieve over 80% of its RHNA target with no significant zoning or policy changes.

The facts do not support this approach, and Planning's "status quo" proposal is flawed for the following reasons:

Planning's "status quo" proposal fails to affirmatively further fair housing, which is required under state law. By planning for most housing growth on parcels where multifamily development is already allowed, the City is steering housing opportunities away from the 75% of the City's residentially-zoned land that is restricted to single-family housing only. This perpetuates historic patterns of segregation and exclusion, and continues to push housing opportunities for lower-income households towards lower-income neighborhoods.

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Personally sent by Ann Bickerton using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Ann Bickerton  
11871 Washington PI Los Angeles, CA 90066-4640  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:52 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Julian Billings [REDACTED]

Sun, Feb 14, 2021 at 3:20 PM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Personally sent by Julian Billings using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Julian Billings  
1423 1/2 Mohawk St Los Angeles, CA 90026-6464  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Tue, Feb 16, 2021 at 10:37 AM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Roseann Boffa &lt;[REDACTED]&gt;

Sat, Feb 13, 2021 at 9:22 AM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Personally sent by Roseann Boffa using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Roseann Boffa  
504 Grand Blvd Apt 4 Venice, CA 90291-4256  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Tue, Feb 16, 2021 at 10:30 AM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]





Housing Element <housingelement@lacity.org>

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## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

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Mark Bolin <[REDACTED]>

Wed, Feb 3, 2021 at 9:04 AM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Mark Bolin using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Mark Bolin  
1400 N Edgemont St Apt 107 Los Angeles, CA 90027-5944  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Feb 4, 2021 at 9:57 AM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,

The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

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## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

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**Kaseem Booker** [REDACTED]

Sat, Feb 13, 2021 at 1:17 PM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Personally sent by Kaseem Booker using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Kaseem Booker

418 N Norton Ave Los Angeles, CA 90004-3845  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Tue, Feb 16, 2021 at 10:32 AM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

---

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

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**Alexander Booth** <[REDACTED]>

Wed, Feb 3, 2021 at 8:33 AM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Alexander Booth using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Alexander Booth  
225 S Olive St Apt 1511 Los Angeles, CA 90012-4906  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Wed, Feb 3, 2021 at 9:35 AM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,

The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Lauren Borchard &lt;[REDACTED]&gt;

Mon, Jan 25, 2021 at 1:22 PM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Lauren Borchard using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Lauren Borchard  
535 1/2 N Orange Dr Los Angeles, CA 90036-2066  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:45 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]





Housing Element &lt;housingelement@lacity.org&gt;

---

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

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**Brent Bovenz** [REDACTED]

Wed, Feb 3, 2021 at 10:50 AM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

It is concerning that the current Dept of Planning believes LA can accommodate 450,000 more homes with no significant zoning changes. We know that isn't true, if it were we wouldn't have the housing affordability crisis we do have. LA is zoned for millions of fewer homes than in decades past. That needs to be reversed. People are having to move farther away from job centers to afford somewhere to live, this sprawl is unsustainable from any angle you look at it, climate change, traffic, air pollution, land use, time wasted commuting, etc. How should we change our zoning?

- Upzone all single-family zoning up to a quadplex minimum
- Upzone along all our transit corridors and job centers, making sure to include wealthy neighborhoods instead of exclude them like we have historically done
- Eliminate parking minimums to prioritize space for people instead of space for cars

These sound ambitious but are exactly the measures that other cities are taking to tackle this crisis. LA should become a leader in this, otherwise we risk losing businesses and people looking for somewhere more affordable. Our City Planning can no longer remain beholden to specific wealthy NIMBY groups and should begin to work for all Angelenos.

Sincerely,  
Brent Bovenzi  
633 Indiana Ave Venice, CA 90291-3013  
[REDACTED]

---

**Housing Element** <housingelement@lacity.org>

Thu, Feb 4, 2021 at 1:58 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Nicholas Burns III [REDACTED]

Mon, Jan 25, 2021 at 1:27 PM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

It is disappointing that Planning does not intend to pursue the equitable distribution approach in the housing element update. Planning recently released an Initial Study for the housing element update which contains numerous inadequacies that merit serious concern. Planning's analysis suggests that the City can achieve over 80% of its RHNA target with no significant zoning or policy changes, and that the remaining 20% can be accommodated via already-in-progress community plan updates and changes to the City's Density Bonus program.

The facts do not support these conclusions, and that Planning's "status quo" proposal is flawed for the following reasons:

Planning's "status quo" proposal fails to affirmatively further fair housing, which is required under state law. By planning for most housing growth on parcels where multifamily development is already allowed, the City is steering housing opportunities away from the 75% of the City's residentially-zoned land that is restricted to single-family housing only. This perpetuates historic patterns of segregation and exclusion, and continues to push housing opportunities for lower-income households towards lower-income neighborhoods.

Planning anticipates that under current zoning, Los Angeles can expect to build 307,000 more homes between 2022 and 2029. However, Los Angeles only permitted about 114,000 homes during the eight-year period ending in 2019, leading to a net increase of 99,000 homes during that time. Planning offers no convincing rationale for why they expect housing production to nearly triple without significant policy or zoning changes.

Planning's anticipated site inventory, where they expect the development of 307,000 more homes to occur, likely contains a large number of parcels zoned for multifamily residential development. This suggests that a large number of existing rent-stabilized housing units would be redeveloped under Planning's "status quo" approach, increasing lower-income renter households' risk of displacement.

Planning anticipates accommodating 93,000 homes primarily through a series of community plan updates that are already in progress. However, many draft community plan updates highlighted in the Initial Study, including updates for the Westside, Hollywood, Southwest Valley, Southeast Valley, and Purple Line Transit Neighborhood Plan, are unambitious and do little to create significant amounts of new housing capacity. This approach also allows high-resource neighborhoods whose community plan update processes have not yet started, like Brentwood-Pacific Palisades and Westwood, to avoid zoning reforms that are necessary to accommodate the City's RHNA goal. This is unfair.

I strongly oppose Planning's "status quo" approach to the housing element update, which would do little to meaningfully address unaffordable housing costs, lengthy commutes, poor air quality, displacement of lower-income renters, and segregated neighborhoods. Fortunately, with eight months remaining until housing element updates are due, there is still time to change course and create an equitable, transformative housing element. I urge you to instruct the Department of City Planning to take this important step for Los Angeles' future.

Personally sent by Nicholas Burns III using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Nicholas Burns III

1740 S Westgate Ave Unit H Los Angeles, CA 90025-3792  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:45 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

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## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

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**Chelsea Byers** [REDACTED]

Wed, Feb 3, 2021 at 3:58 PM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Chelsea Byers using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Chelsea Byers  
9031 Phyllis Ave West Hollywood, CA 90069-4424  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Feb 4, 2021 at 2:01 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,

The Housing Element Team

[Quoted text hidden]



Housing Element <housingelement@lacity.org>

# Fwd: Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

**Flora Melendez** <flora.melendez@lacity.org>  
To: Housing Element <housingelement@lacity.org>

Mon, Jan 25, 2021 at 11:25 AM

Hello.

I'm forwarding an email received by Vince.

Thank you.

~ Angie



LOS ANGELES  
CITY PLANNING

**Flora (Angie) Melendez**  
Pronouns: she/hers/her  
Executive Administrative Assistant  
**Los Angeles City Planning**  
200 N. Spring St., Suite 525C  
Los Angeles, CA 90012  
Planning4LA.org  
T: (213) 978-1271 | F: (213) 978-1275  
E: flora.melendez@lacity.org



----- Forwarded message -----

From: **Vince Bertoni** <vince.bertoni@lacity.org>  
Date: Mon, Jan 25, 2021 at 11:10 AM  
Subject: Fwd: Housing Element Environmental Impact Report - Opposition to Status Quo Plan  
To: Flora Melendez <flora.melendez@lacity.org>



LOS ANGELES  
CITY PLANNING

**Vincent P. Bertoni, AICP**  
Pronouns: He, His, Him  
Director of Planning  
**Los Angeles City Planning**  
200 N. Spring St., Suite 525C  
Los Angeles, CA 90012  
Planning4LA.org  
T: (213) 978-1271 | F: (213) 978-1275  
E: vince.bertoni@lacity.org



----- Forwarded message -----

From: **Leonora Camner** <[REDACTED]>  
Date: Mon, Jan 25, 2021 at 11:03 AM  
Subject: Housing Element Environmental Impact Report - Opposition to Status Quo Plan  
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Planning's anticipated site inventory, where they expect the development of 307,000 more homes to occur, likely contains a large number of parcels zoned for multifamily residential development. This suggests that a large number of existing rent-stabilized housing units would be redeveloped under Planning's "status quo" approach, increasing lower-income renter households' risk of displacement.

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I strongly oppose Planning's "status quo" approach to the housing element update, which would do little to meaningfully address unaffordable housing costs, lengthy commutes, poor air quality, displacement of lower-income renters, and segregated neighborhoods. Fortunately, with eight months remaining until housing element updates are due, there is still time to change course and create an equitable, transformative housing element. I urge you to instruct the Department of City Planning to take this important step for Los Angeles' future.

Personally sent by Leonora Camner using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Leonora Camner  
1013 16th St Santa Monica, CA 90403-4331  
[REDACTED]

---

Housing Element <housingelement@lacity.org>  
To [REDACTED]

Thu, Jan 28, 2021 at 4:36 PM

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team  
[Quoted text hidden]





Housing Element <housingelement@lacity.org>

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## Comment on Draft Housing Element, EIR

2 messages

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**Jeffrey Carpente** [REDACTED]  
To: housingelement@lacity.org

Mon, Feb 15, 2021 at 5:15 PM

Department of City Planning  
City of Los Angeles  
200 North Spring Street, Room 750  
Los Angeles, CA 90012

ATTN: Cally Hardy, City Planning Associate  
RE: Case Numbers: CPC-2020-1365-GPA; ENV-2020-6762-EIR

Dear Ms. Hardy:

In my imperfect reading of the draft housing element, I was concerned that there was not adequate attention given to protecting and expanding the mature tree canopy cover. As I monitor the review of new housing proposed in my Neighborhood Council Land Use Committee, more often than not developers propose removing mature trees, finding them inconvenient for their construction processes.

Current City tree protection provisions have proven to be gravely inadequate and I would urge that the Housing Element take note of the need to nurture and expand the urban tree canopy. New housing invariably increases the potential heat island effects of buildings, impacting neighborhood cooling, residential energy conservation and neighborhood livability.

For these reasons, I would ask that the EIR and the Housing Element more directly address the need to assure the protection and enhancement of the urban tree canopy in the course of implementation of new housing supply.

Respectfully,

Jeff Carpenter  
Jeffrey Carpenter  
[REDACTED] | (323) 930-1627  
215 So. Orange Dr., Los Angeles, CA 90036-3010

---

**Housing Element** <housingelement@lacity.org>

Tue, Feb 16, 2021 at 10:58 AM

To: Jeffrey Carpente [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team  
[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

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## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

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**Jennifer Carter** [REDACTED] >

Wed, Feb 3, 2021 at 9:58 AM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

Taking real action will ultimately help cut down on the amount of homeless people on the street, greatly lessen traffic and lower the spread of Covid which is increased when too many people are crammed into small living quarters. These are goals we can all get behind that makes quality of life better not just for people who need something affordable for everyone everywhere. Please listen to the experts at Abundant Housing LA and pass the more ambitious plan to reach these goals.

I strongly oppose Planning's "status quo" approach to the housing element update, which would do little to meaningfully address unaffordable housing costs, lengthy commutes, poor air quality, displacement of lower-income renters, and segregated neighborhoods.

Personally sent by Jennifer Carter using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Jennifer Carter  
4210 La Salle Ave Culver City, CA 90232-3212  
[REDACTED]

---

**Housing Element** <housingelement@lacity.org>

Thu, Feb 4, 2021 at 1:57 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element <housingelement@lacity.org>

---

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

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Anthony Castelletto [REDACTED]

Wed, Feb 3, 2021 at 11:07 AM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Sincerely,  
Anthony Castelletto  
3608 Keystone Ave Apt 4 Los Angeles, CA 90034-5622  
[REDACTED]

2/16/2021

City of Los Angeles Mail - Housing Element Environmental Impact Report - Opposition to Status Quo Plan

**Housing Element** <housingelement@lacity.org>

Thu, Feb 4, 2021 at 1:59 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,

The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

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## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

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**Logan Cimino** [REDACTED]

Mon, Jan 25, 2021 at 6:53 PM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Personally sent by Logan Cimino, using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Logan Cimino  
6530 Seville Rd Unit 310 Goleta, CA 93117-7125  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:51 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Shane Coburn [REDACTED]

Mon, Jan 25, 2021 at 2:13 PM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Shane Coburn using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Shane Coburn  
4013 1/2 Boise Ave Los Angeles, CA 90066-4801  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:47 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]





Housing Element &lt;housingelement@lacity.org&gt;

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## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Catherine Curtis &lt;[REDACTED]&gt;

Wed, Feb 3, 2021 at 9:11 AM

Reply-To: [REDACTED]  
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

Covid has only enhanced the inequities of LA's housing crisis. The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Planning anticipates that under current zoning, Los Angeles can expect to build 307,000 more homes between 2022 and 2029. However, Los Angeles only permitted about 114,000 homes during the eight-year period ending in 2019, leading to a net increase of 99,000 homes during that time. Planning offers no convincing rationale for why they expect housing production to nearly triple without significant policy or zoning changes.

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I strongly oppose Planning's "status quo" approach to the housing element update, which would do little to meaningfully address unaffordable housing costs, lengthy commutes, poor air quality, displacement of lower-income renters, and segregated neighborhoods. Fortunately, with eight months remaining until housing element updates are due, there is still time to change course and create an equitable, transformative housing element. I urge you to instruct the Department of City Planning to take this important step for Los Angeles' future.

Personally sent by Catherine Curtis using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Catherine Curtis  
219 S Barrington Ave Los Angeles, CA 90049-3354  
[REDACTED]

---

**Housing Element** <housingelement@lacity.org>

Thu, Feb 4, 2021 at 9:57 AM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,

The Housing Element Team

[Quoted text hidden]



Housing Element <housingelement@lacity.org>

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## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

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**Austin Cyr** [REDACTED]

Sat, Feb 13, 2021 at 9:31 AM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

It is disappointing that Planning does not intend to pursue the equitable distribution approach in the housing element update. Planning recently released an Initial Study for the housing element update which contains numerous inadequacies that merit serious concern. Planning's analysis suggests that the City can achieve over 80% of its RHNA target with no significant zoning or policy changes, and that the remaining 20% can be accommodated via already-in-progress community plan updates and changes to the City's Density Bonus program.

The facts do not support these conclusions, and that Planning's "status quo" proposal is flawed for the following reasons:

Planning's "status quo" proposal fails to affirmatively further fair housing, which is required under state law. By planning for most housing growth on parcels where multifamily development is already allowed, the City is steering housing opportunities away from the 75% of the City's residentially-zoned land that is restricted to single-family housing only. This perpetuates historic patterns of segregation and exclusion, and continues to push housing opportunities for lower-income households towards lower-income neighborhoods.

Planning anticipates that under current zoning, Los Angeles can expect to build 307,000 more homes between 2022 and 2029. However, Los Angeles only permitted about 114,000 homes during the eight-year period ending in 2019, leading to a net increase of 99,000 homes during that time. Planning offers no convincing rationale for why they expect housing production to nearly triple without significant policy or zoning changes.

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Personally sent by Austin Cyr using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Austin Cyr  
9031 Phyllis Ave Apt 3 West Hollywood, CA 90069-4424  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Tue, Feb 16, 2021 at 10:31 AM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Emerson Dameron [REDACTED] &gt;

Mon, Jan 25, 2021 at 1:09 PM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Personally sent by Emerson Dameron using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Emerson Dameron  
5837 W Sunset Blvd Apt 216 Los Angeles, CA 90028-7341  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:43 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

3 messages

Emerson Dameron [REDACTED]

Mon, Feb 1, 2021 at 1:34 PM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

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Personally sent by Emerson Dameron using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Emerson Dameron

5837 W Sunset Blvd Apt 216 Los Angeles, CA 90028-7341  
[REDACTED]

Nolan Gray <[REDACTED]>

Wed, Feb 3, 2021 at 9:31 AM

Reply-To: [REDACTED]  
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Personally sent by Nolan Gray using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Nolan Gray  
725 Weyburn Ter Apt 104 Los Angeles, CA 90024-7224  
[REDACTED]

---

Housing Element <housingelement@lacity.org>

Wed, Feb 3, 2021 at 9:31 AM

To [REDACTED]

Hi Emerson,

Thank you for your email. Your comments and/or attachments have been received and filed.



Regards,  
The Housing Element Team  
[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

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**CPC-2020-1365-GPA ENV 2020 6762 EIR**

2 messages

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**Joanne D'Antonio** [REDACTED]  
To: housingelement@lacity.org

Mon, Feb 15, 2021 at 3:40 PM

Dear Ms. Hardy,

I attended your scoping meeting last month, and this comment letter is to urge you to add a very important environmental consideration, **EXISTING TREES AND TREE CANOPY**, to the Topics to be Analyzed in the EIR listed on page 17 of your Staff Presentation - HE \_ SE Scoping Meeting for the Housing Element 2021-2029 Update/Safety Element Update.

Any development must consider the environmental consequences of removing any existing mature trees, as their ecosystem services are vital to the health of the community. Please note that simply re-planting has been shown not to be a mitigation of this loss:

(Planting Trees Sounds Like A Simple Climate Fix. It's Anything But. [https://www.huffpost.com/entry/planting-trees-not-simple-climate-fix\\_n\\_601c1627c5b6c0af54d17e98?ncid=engmodushpimg00000006](https://www.huffpost.com/entry/planting-trees-not-simple-climate-fix_n_601c1627c5b6c0af54d17e98?ncid=engmodushpimg00000006)).

Replanting is particularly insufficient when the trees grow in irreplaceable, naturally-occurring woodlands that are habitat for wildlife.

When structures are built to property lines without concern for open space and vegetation, they often prohibit large tree planting. When there is room, trees can take 20 or 30 years to mature, and that is if they can survive droughts -- saplings have a high mortality rate in our climate as we were told by Matt Wells, Santa Monica Chief Forester at the First Los Angeles Tree Summit in 2019. Very large trees like ficus and liquidambar are no longer even planted in Los Angeles by Urban Forestry, and very large trees are not on the city lists for landscape designers.

Density is an issue that must be analyzed and balanced with the ecosystem services of trees. Trees sequester carbon, mitigate flooding, cleanse the air and provide the shade that prevents heat island effect. They also provide calm -- environmental justice communities and psychologists remind us the lack of trees contributes to crime and unrest. Trees are truly vital to the health and environmental sustainability of our City and its residents. So how can they not be an important topic in your EIR? I should think CEQA would demand it. To not consider the effect of your housing plan on the urban forest is to invite lengthy comment letters which include scientific studies citations. There were such letters sent to the City Sidewalk Repair Program draft EIR by concerned stakeholders and City organizations of which I am part.

I am the founder and Chair of the Neighborhood Council Sustainability Alliance (NCSA) Trees Committee, which has over 50 members throughout the City of Los Angeles. This is our mission: *NCSA Trees Committee Mission: to protect the city's urban forest and to promote its care on behalf of the community through advocacy, outreach, and education.* I track every official tree removal request for a street tree or protected tree that comes to Urban Forestry, almost always by someone involved in construction, and post it on our website. Street trees are removed for driveways, utility boxes, sidewalk repair, and construction staging. Data is currently being compiled, and it is disturbing. We are advocating for existing trees to be considered at the beginning of the design process -- a more environmentally responsible approach.

I am also an officially appointed (by the City Councilman) representative to the Community Forest Advisory Committee (CFAC) for Council District 2. We lobbied for the tree inventory that is currently in progress for the public trees of the City.

I also serve as Planning and Land Use Chair for my neighborhood council, and I see how properties are routinely clear-cut for grading without any attempt to preserve existing trees.

The US Forest Service advocates for Urban Forestry Preservation <https://www.fs.fed.us/research/urban-science-delivery-team.php> and expects cities to listen to their recommendations.

The City Dudek Report toward an Urban Forestry Management Plan of 2018 reported a disturbing picture of the state of trees in our City. [https://www.cityplants.org/wp-content/uploads/2018/12/10939\\_LA-City-Plants\\_FirstStep\\_Report\\_FINAL\\_rev12-7-18.pdf](https://www.cityplants.org/wp-content/uploads/2018/12/10939_LA-City-Plants_FirstStep_Report_FINAL_rev12-7-18.pdf)

It was prepared by a working group of entities in our City that work with trees, including Urban Forestry Division, Rec & Parks, Council Offices, Mayor's Office, TreePeople, CFAC, BPW, etc. I represented the NCSA Trees Committee in this group. The Urban Forestry Management Plan is currently being written by our newly-appointed City Forest Officer and will take effect during the years your plan encompasses.

Los Angeles has had canopy studies, one by Tree People in 2016 <https://www.treepeople.org/los-angeles-county-tree-canopy-map-viewer/> and another from Google, the latter done to analyze the extreme heat risk in our City and is updated yearly, so we can see the deforestation happening as the years pass. <https://9to5google.com/2020/11/18/google-tree-canopy-lab/>

You can see the diminishing canopy when you scan through the years for Los Angeles neighborhoods on Google Earth Pro. We need to understand the science of what this does to the health of our residents and consider that repurposing existing structures may be a better approach to solve the housing needs of the future.

Finally, tree removal complaints are all over Nextdoor. The community is upset. Trees are removed to put in ADUs. Many projects are 'by right', and nothing stops almost all the tree removals. No attempt is made to even retain perimeter trees that might be saved and maintain neighbor privacy. Much development is done by people not of the community so they do not concern themselves with the quality of life or health of the residents. With people able to work from home, we may see an exodus if we do not have environmental planning for the future that includes trees.

Please accept the advice that it would be a serious omission not to consider the environmental effects of any urban forest reduction in the course of planning future housing and look for ways to avoid the deforestation of our city. I urge you to add EXISTING TREES AND TREE CANOPY as an important, stand-alone element to your list of topics.

Thank you for this important consideration.

***Joanne D'Antonio***

*Neighborhood Council Sustainability Alliance, Trees Committee Chair  
Community Forest Advisory Committee Alternate Representative, CD 2  
Greater Valley Glen Council Sustainability Representative, Secretary, PLUC Chair  
NCSA Representative, Urban Forestry Management Plan Working Group*

[REDACTED]  
[REDACTED]  
[REDACTED]  
(818) 387-8631

<https://www.ncsa.la/trees>

***NCSA Trees Committee Mission: to protect the city's urban forest and to promote its care on behalf of the community through advocacy, outreach, and education.***

---

**Housing Element** <housingelement@lacity.org>

Tue, Feb 16, 2021 at 10:49 AM

To: Joanne D'Antoni [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

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## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

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**Brian Davis** [REDACTED]

Mon, Jan 25, 2021 at 3:01 PM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Personally sent by Brian Davis using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Brian Davis  
1310 N Avenue 56 Los Angeles, CA 90042-1832  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:48 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]

**Housing Element** <housingelement@lacity.org>

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## Housing Plan

2 messages

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**Marianne Davis** [REDACTED]  
To: housingelement@lacity.org

Tue, Feb 16, 2021 at 11:28 AM

TO: [housingelement@lacity.org](mailto:housingelement@lacity.org); City of Los Angeles, Department of City Planning

ATTN: Cally Hardy, City Planning Associate Case Numbers: CPC-2020-1365-GPA; ENV-2020-6762-EIR [200 N. Spring Street, Room 750, Los Angeles, CA 90012](#)

Dear Ms. Hardy:

Please correct the plan to make it so that an EIR HAS to be called whenever mature trees are slated for removal during a development project. The City of Los Angeles is itself placing so much emphasis on conserving and canopy, and then this plan just allows it to happen, no big deal. This is just wrong.

Mitigation of removal of a mature tree can ONLY be achieved by either moving the tree in question, or replacing one of EQUAL size. You can't mitigate this kind of removal by planting a little sapling. That's just completely unacceptable and does nothing. An EIR is in order.

Thank you for paying attention to this, we need to save our City from becoming a overheated sterile desert.

Sincerely,

Marianne Davis, MPH MLS  
San Fernando Valley Audubon Society, 2d Vice/Publicity  
San Fernando Valley Iris Society, Board member  
North Los Angeles County Regional Center, Board of Trustees

[4633 Noeline Avenue](#)  
[Encino, CA 91436](#)  
310 529 8871

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**Housing Element** <housingelement@lacity.org>  
To: Marianne Davis [REDACTED]

Tue, Feb 16, 2021 at 4:24 PM

Thank you for your email. Your comment was submitted after the deadline for comments; the comment is marked late, but has been received and will be included in the environmental case file.

Regards,  
The Housing Element Team  
[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Anthony Dedousis [REDACTED]

Mon, Jan 25, 2021 at 1:17 PM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Anthony Dedousis using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Anthony Dedousis  
1942 Rodney Dr Apt 17 Los Angeles, CA 90027-3136  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:44 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]





Housing Element <housingelement@lacity.org>

---

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

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Jan Delos Santos [REDACTED]  
Reply-To [REDACTED]  
To: vince.bertoni@lacity.org

Mon, Jan 25, 2021 at 3:13 PM

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Personally sent by Jan Delos Santos using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Jan Delos Santos  
1515 S Orange Grove Ave Los Angeles, CA 90019-4923  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:49 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element <housingelement@lacity.org>

---

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

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Michelle DiBattiste <[REDACTED]>  
Reply-To: [REDACTED]  
To: vince.bertoni@lacity.org

Wed, Feb 3, 2021 at 8:25 AM

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Personally sent by Michelle DiBattiste using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Michelle DiBattiste  
3827 Mentone Ave Apt 2 Culver City, CA 90232-3120  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Wed, Feb 3, 2021 at 9:33 AM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,

The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

GREGORY DINA &lt;[REDACTED]&gt;

Mon, Jan 25, 2021 at 2:47 PM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by GREGORY DINA using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
GREGORY DINA  
6427 W 86th Pl Los Angeles, CA 90045-3702  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:48 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Matthew Dixon &lt;[REDACTED]&gt;

Sat, Feb 13, 2021 at 4:23 PM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

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Personally sent by Matthew Dixon using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Matthew Dixon  
859 E Promenade Unit B Azusa, CA 91702-6801  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Tue, Feb 16, 2021 at 10:33 AM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]





Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Nina Dooley [REDACTED]

Sun, Feb 14, 2021 at 12:38 PM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

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Personally sent by Nina Dooley using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Nina Dooley

610 S Gertruda Ave Redondo Beach, CA 90277-4245  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Tue, Feb 16, 2021 at 10:36 AM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Chris Dower &lt;[REDACTED]&gt;

Mon, Jan 25, 2021 at 7:30 PM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Chris Dower using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Chris Dower  
333 S Doheny Dr Apt 403 Los Angeles, CA 90048-3773  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:51 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Brooks Dunn [REDACTED]

Mon, Feb 1, 2021 at 2:00 PM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Brooks Dunn using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Brooks Dunn  
2000 Alberta Ave Apt 10 Venice, CA 90291-4565  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Wed, Feb 3, 2021 at 9:32 AM

To [REDACTED]

Hi Brooks,

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,

The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Kira Durbin [REDACTED]

Thu, Feb 4, 2021 at 1:55 AM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

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Personally sent by Kira Durbin using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Kira Durbin  
14716 Albers St Sherman Oaks, CA 91411-3712  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Feb 4, 2021 at 2:01 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,

The Housing Element Team

[Quoted text hidden]





Housing Element <housingelement@lacity.org>

---

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

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Jonathan Edeward [REDACTED]

Tue, Jan 26, 2021 at 8:08 PM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Planning's "status quo" proposal fails to affirmatively further fair housing, which is required under state law. By planning for most housing growth on parcels where multifamily development is already allowed, the City is steering housing opportunities away from the 75% of the City's residentially-zoned land that is restricted to single-family housing only. This perpetuates historic patterns of segregation and exclusion, and continues to push housing opportunities for lower-income households towards lower-income neighborhoods.

Planning anticipates that under current zoning, Los Angeles can expect to build 307,000 more homes between 2022 and 2029. However, Los Angeles only permitted about 114,000 homes during the eight-year period ending in 2019, leading to a net increase of 99,000 homes during that time. Planning offers no convincing rationale for why they expect housing production to nearly triple without significant policy or zoning changes.

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Personally sent by Jonathan Edwards using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Jonathan Edwards  
161 S Madison Ave Apt 12 Pasadena, CA 91101-2544  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:56 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Seth Ellsworth &lt;[REDACTED]&gt;

Mon, Jan 25, 2021 at 1:09 PM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Personally sent by Seth Ellsworth using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Seth Ellsworth  
5078 Pickford St Los Angeles, CA 90019-5373  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:43 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

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## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

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Rachel Enders <[REDACTED]>

Sun, Feb 14, 2021 at 8:41 PM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Rachel Enders using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Rachel Enders  
22121 Erwin St Apt M118 Woodland Hills, CA 91367-3474  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Tue, Feb 16, 2021 at 10:37 AM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Chase Engelhardt &lt;[REDACTED]&gt;

Mon, Jan 25, 2021 at 3:39 PM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

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Personally sent by Chase Engelhardt using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Chase Engelhardt  
1635 Stoner Ave Los Angeles, CA 90025-1863  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:49 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]





Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Connor Finney [REDACTED]

Tue, Jan 26, 2021 at 7:57 AM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Connor Finney using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Connor Finney  
3838 Dunn Dr Culver City, CA 90232-2729  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:52 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Connor Finney &lt;[REDACTED]&gt;

Thu, Jan 28, 2021 at 11:06 AM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Connor Finney using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Connor Finney  
3838 Dunn Dr Apt 609 Culver City, CA 90232-2776  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:57 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Elizabeth Florence [REDACTED] &gt;

Wed, Jan 27, 2021 at 3:16 PM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Elizabeth Florence using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Elizabeth Florence  
3333 Motor Ave Los Angeles, CA 90034-3757  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:57 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Brad Foley [REDACTED]

Mon, Jan 25, 2021 at 3:37 PM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

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Personally sent by Brad Foley using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Brad Foley

2702 S Normandie Ave Los Angeles, CA 90007-2114  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:49 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]





Housing Element <housingelement@lacity.org>

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## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

---

David Foster [REDACTED]

Sat, Feb 13, 2021 at 9:52 AM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

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Personally sent by David Foster using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
David Foster  
7170 Rosewood Ave Los Angeles, CA 90036-1924  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Tue, Feb 16, 2021 at 10:32 AM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Alexandra Franklin [REDACTED]

Mon, Jan 25, 2021 at 2:38 PM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

It is disappointing that Planning does not intend to pursue the equitable distribution approach in the housing element update. Planning recently released an Initial Study for the housing element update which contains numerous inadequacies that merit serious concern. Planning's analysis suggests that the City can achieve over 80% of its RHNA target with no significant zoning or policy changes, and that the remaining 20% can be accommodated via already-in-progress community plan updates and changes to the City's Density Bonus program.

The facts do not support these conclusions, and that Planning's "status quo" proposal is flawed for the following reasons:

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Planning anticipates that under current zoning, Los Angeles can expect to build 307,000 more homes between 2022 and 2029. However, Los Angeles only permitted about 114,000 homes during the eight-year period ending in 2019, leading to a net increase of 99,000 homes during that time. Planning offers no convincing rationale for why they expect housing production to nearly triple without significant policy or zoning changes.

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Personally sent by Alexandra Franklin using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Alexandra Franklin  
10270 Almayo Ave Apt 204 Los Angeles, CA 90064-3256  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:48 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Verity Freebern [REDACTED]

Mon, Jan 25, 2021 at 2:05 PM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

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Personally sent by Verity Freebern using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Verity Freebern  
4258 Verdugo Rd Los Angeles, CA 90065-4714  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:47 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Andy Freeland &lt;[REDACTED]&gt;

Mon, Jan 25, 2021 at 6:23 PM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

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Personally sent by Andy Freeland using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Andy Freeland  
645 W 9th St Apt 516 Los Angeles, CA 90015-1651  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:51 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]





Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

**Brent Gaisford** [REDACTED]

Mon, Jan 25, 2021 at 3:55 PM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

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Personally sent by Brent Gaisford using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Brent Gaisford

4447 Lockwood Ave Los Angeles, CA 90029-2706  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:50 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

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## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

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**Sister Bernie Galvin** <[REDACTED]>

Mon, Jan 25, 2021 at 3:51 PM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Sister Bernie Galvin using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Sister Bernie Galvin  
2404 Mayer Dr Saint Charles, MO 63301-1313  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:49 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Griffin Gill &lt;[REDACTED]&gt;

Sat, Feb 13, 2021 at 9:50 AM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Griffin Gill using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Griffin Gill  
1602 Silver Lake Blvd Los Angeles, CA 90026-1311  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Tue, Feb 16, 2021 at 10:31 AM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Jennifer Gill [REDACTED]

Wed, Feb 3, 2021 at 8:23 AM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

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Personally sent by Jennifer Gill using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Jennifer Gill  
2424 Wilshire Blvd Apt 519 Los Angeles, CA 90057-3353  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Wed, Feb 3, 2021 at 9:32 AM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,

The Housing Element Team

[Quoted text hidden]





Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Rebecca Gimple [REDACTED] &gt;

Mon, Jan 25, 2021 at 1:12 PM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

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Personally sent by Rebecca Gimple using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Rebecca Gimple  
333 E Fairview Ave Apt 218 Glendale, CA 91207-2241  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:44 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,

The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

---

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

---

**Drew Glicker** <[REDACTED]>

Mon, Jan 25, 2021 at 1:53 PM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

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Personally sent by Drew Glicker using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Drew Glicker  
7523 Hollywood Blvd Los Angeles, CA 90046-2856  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:46 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Golden Gonzales-Palmer &lt;[REDACTED]&gt;

Wed, Feb 3, 2021 at 10:36 AM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

It is disappointing that Planning does not intend to pursue the equitable distribution approach in the housing element update. Planning recently released an Initial Study for the housing element update which contains numerous inadequacies that merit serious concern. Planning's analysis suggests that the City can achieve over 80% of its RHNA target with no significant zoning or policy changes, and that the remaining 20% can be accommodated via already-in-progress community plan updates and changes to the City's Density Bonus program.

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Personally sent by Golden Gonzales-Palmer using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Golden Gonzales-Palmer  
19701 Corbin Ln Winnetka, CA 91306-3074  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Feb 4, 2021 at 1:57 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,

The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Lowell Gordon [REDACTED]

Tue, Jan 26, 2021 at 3:19 PM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Lowell Gordon using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Lowell Gordon  
711 S Olive St Apt 304 Los Angeles, CA 90014-2624  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:53 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]





Housing Element <housingelement@lacity.org>

---

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

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Josh Gray-Emme [REDACTED]  
Reply-To [REDACTED]  
To: vince.bertoni@lacity.org

Wed, Feb 3, 2021 at 1:07 PM

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Personally sent by Josh Gray-Emmer using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Josh Gray-Emmer  
416 S Spring St Los Angeles, CA 90013-1991  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Feb 4, 2021 at 1:59 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,

The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Julia Griffin [REDACTED]

Tue, Jan 26, 2021 at 9:59 PM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

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Personally sent by Julia Griffin using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Julia Griffin  
736 N Harvard Blvd Los Angeles, CA 90029-3314  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:56 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Alexandra Grossi &lt;[REDACTED]&gt;

Mon, Jan 25, 2021 at 1:20 PM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Alexandra Grossi using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Alexandra Grossi  
2135 Fair Park Ave Los Angeles, CA 90041-1956  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:44 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Steven Guerry &lt;[REDACTED]&gt;

Mon, Jan 25, 2021 at 1:20 PM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

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Personally sent by Steven Guerry using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Steven Guerry  
5346 S Cornell Ave Apt 906 Chicago, IL 60615-5479  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:44 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]





Housing Element <housingelement@lacity.org>

# Fwd: Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

**Flora Melendez** <flora.melendez@lacity.org>  
To: Housing Element <housingelement@lacity.org>

Mon, Jan 25, 2021 at 10:56 AM

Hello.

I'm forwarding an email received by Vince.

Thank you.

~ Angie



**Flora (Angie) Melendez**  
Pronouns: she/hers/her  
Executive Administrative Assistant  
**Los Angeles City Planning**  
200 N. Spring St., Suite 525C  
Los Angeles, CA 90012  
Planning4LA.org  
T: (213) 978-1271 | F: (213) 978-1275  
E: flora.melendez@lacity.org



----- Forwarded message -----

From: **Vince Bertoni** <vince.bertoni@lacity.org>  
Date: Mon, Jan 25, 2021 at 10:55 AM  
Subject: Fwd: Housing Element Environmental Impact Report - Opposition to Status Quo Plan  
To: Flora Melendez <flora.melendez@lacity.org>



**Vincent P. Bertoni, AICP**  
Pronouns: He, His, Him  
Director of Planning  
**Los Angeles City Planning**  
200 N. Spring St., Suite 525C  
Los Angeles, CA 90012  
Planning4LA.org  
T: (213) 978-1271 | F: (213) 978-1275  
E: vince.bertoni@lacity.org



----- Forwarded message -----

From: **ryan guggenheim** <[REDACTED]>  
Date: Mon, Jan 25, 2021 at 10:54 AM  
Subject: Housing Element Environmental Impact Report - Opposition to Status Quo Plan  
To: <vince.bertoni@lacity.org>

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Personally sent by ryan guggenheim using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
ryan guggenheim  
2621 1/2 Magnolia Ave Los Angeles, CA 90007-2792  
[REDACTED]

---

Housing Element <housingelement@lacity.org>  
To [REDACTED]

Thu, Jan 28, 2021 at 4:35 PM

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team  
[Quoted text hidden]



Housing Element <housingelement@lacity.org>

---

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

---

Ryan Hass [REDACTED]

Wed, Feb 3, 2021 at 8:39 AM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

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Personally sent by Ryan Hass using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Ryan Hass  
757 Ocean Ave Santa Monica, CA 90402-2614  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Wed, Feb 3, 2021 at 9:35 AM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,

The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

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## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

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**Andrew Heinzman** <[REDACTED]>

Mon, Jan 25, 2021 at 2:06 PM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Personally sent by Andrew Heinzman using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Andrew Heinzman  
1866 Greenfield Ave Los Angeles, CA 90025-4400  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:47 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Andrew Heinzman &lt;[REDACTED]&gt;

Tue, Feb 16, 2021 at 5:40 PM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Andrew Heinzman using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Andrew Heinzman  
1866 Greenfield Ave Los Angeles, CA 90025-4400  
[REDACTED]



**Housing Element** <housingelement@lacity.org>

Tue, Feb 16, 2021 at 6:37 PM

To: [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element <housingelement@lacity.org>

## Comment -- Housing Element 2021-2029 Update

2 messages

Rosalind Helfand <[REDACTED]>  
To: housingelement@lacity.org

Mon, Feb 15, 2021 at 3:57 PM

Greetings Ms. Hardy,

I'm writing to comment on the scoping for the Housing Element 2021-2029 Update.

I'm concerned that under "Topics to be Analyzed in the EIR," only the very broad and vague category of "biological resources" is mentioned but not an specific types of biological resources which are critical to meeting the Project Objective of promoting climate and disaster resiliency, sustainability, and environmental justice.

Specifically, the impact on the integrity of the Urban Forest needs to be carefully analyzed as its own topic in the EIR. Due to the increasing heat and drought impacts in Los Angeles and currently insufficient measures available to ensure that newly planted trees will last more than a few years past their planting, any plans to simply plant more trees will not make up for the loss of mature trees during development -- both on the housing properties and during and on public sidewalk and road areas. This includes both native and non-native species. This also includes both individual trees and stands of trees.

The urban forest is critical to reducing the severe health impacts of air pollution, increasing shade and naturally cooling streets and buildings, reducing polluting stormwater runoff, and increasing urban biodiversity, including habitat for migratory species. The impacts of development on mature trees and stands of trees (which can have an especially high biological value), as well as a realistic assessment of the viability of planting and maintaining new trees through to maturity as part of the housing development process must be examined both as a biological resource and as a resiliency and environmental justice issue.

Offset planting for any mature trees lost during development is, again, an insufficient measure as this will, even if successful, take decades to reproduce ecosystem services lost. Trees have a cumulative positive impact and incremental loss of trees therefore adds up to a big negative impact on the urban environment and the health and wellbeing of people.

An additional related issue that should be taken into consideration under the EIR is the impact of development on any current corridors through the urban environment for species that migrate through the region, whether in the air or on land.

Thank you for your consideration.

Yours,

Rosalind Helfand  
310-869-5749

[REDACTED]  
1956 N Beachwood Dr., Apt. 8  
Los Angeles, CA 90068

--

Rosalind Helfand  
Environmental & Social Policy Advisor

Housing Element <housingelement@lacity.org>  
To: Rosalind Helfand <[REDACTED]>

Tue, Feb 16, 2021 at 10:50 AM

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

2/16/2021

City of Los Angeles Mail - Comment -- Housing Element 2021-2029 Update

[Quoted text hidden]



Housing Element <housingelement@lacity.org>

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## comment on Housing Element 2021-2029 Update

2 messages

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**Ann-Marie Holman** [REDACTED]  
To: housingelement@lacity.org

Mon, Feb 15, 2021 at 4:23 PM

City of Los Angeles, Department of City Planning  
ATTN: Cally Hardy, City Planning Associate  
Case numbers:  
CPC-2020-1365-GPA  
ENV-2020-6762-EIR

Greetings,

I'm writing to request that the environmental impact of removing trees - especially mature, established trees - for development be added to the list of topics to be analyzed for the Environmental Impact Report for the Housing Element 2021-2029 Update.

Thank you for your consideration,  
Ann-Marie Holman  
Sherman Oaks, CA

---

**Housing Element** <housingelement@lacity.org>  
To: Ann-Marie Holman [REDACTED]

Tue, Feb 16, 2021 at 10:51 AM

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team  
[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

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**Re: RHNA timeline, suggestions for 4415-4421 ledge**

1 message

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**Jena Houman** <[REDACTED]>  
To: Housing Element <housingelement@lacity.org>

Thu, Jan 28, 2021 at 5:23 PM

hi dear sir/madam

is it possible for your dept to consider rezoning [4415-4421 ledge ave](#) in city of los angeles, 91602. Right now , it has four 1 bedroom, 1 bathroom units, it is downzoned to three units per lot but because of SB330 law recently signed, it has become very confusing on what zoning or city would allow to build there. is it possible for you to clarify this case please.

thank u very much in advance

---

**From:** cally.hardy@lacity.org <cally.hardy@lacity.org> on behalf of Housing Element <housingelement@lacity.org>**Sent:** Thursday, January 28, 2021 4:07 PM**To:** Jena Houman <[REDACTED]>**Subject:** Re: RHNA timeline

Dear

Jena:

Thank

you for your email. The City is currently developing the Site Selection methodology that will be needed to determine the rezoning need under the Housing Element Update. Please feel free to send us any suggestions for rezoning and we can take them into consideration during the plan process. Additionally, you can find more information about the plan update on our website [planning4LA.org/Plan2HouseLA](http://planning4LA.org/Plan2HouseLA).

We will be doing additional outreach seeking community input on the Plan in Late February and March.

Regards,

-The

Housing Element Team

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On Wed, Jan 13, 2021 at 3:33 PM Jena Houman <[REDACTED]> wrote:

hi cally

happy new year

interested to know what is the time table to determine if any area has to be rezoned in city of la?

or is it something that anyone can make suggestions in regards to a specific property or location to RHNA which would make a good candidate for rezoning?

Regards

Jena Houman

Westside Stone &amp; Hardwood

[2130 Cotner Ave](#)

2/16/2021

City of Los Angeles Mail - Re: RHNA timeline, suggestions for 4415-4421 ledge

Los Angeles CA 90025

T 310-478-3888

F 310-478-7398



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Thomas Irwi [REDACTED]

Mon, Jan 25, 2021 at 3:01 PM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Thomas Irwin using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Thomas Irwin

962 S Woods Ave East Los Angeles, CA 90022-3931  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:48 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]





Housing Element <housingelement@lacity.org>

---

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

---

Eddie Isaac [REDACTED]

Wed, Feb 3, 2021 at 10:08 AM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Eddie Isaacs using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Eddie Isaacs  
375 E 2nd St Apt 603 Los Angeles, CA 90012-4157  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Feb 4, 2021 at 1:57 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,

The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

---

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Eddie Isaacs [REDACTED]

Mon, Feb 15, 2021 at 3:36 PM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

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Sincerely,

Eddie Isaacs

375 E 2nd St Los Angeles, CA 90012-4239  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Tue, Feb 16, 2021 at 10:48 AM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Edgar Jackson [REDACTED]

Wed, Feb 3, 2021 at 8:23 AM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

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Personally sent by Edgar Jackson using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Edgar Jackson  
10935 Fulton Wells Ave Apt 615 Santa Fe Springs, CA 90670-5929  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Wed, Feb 3, 2021 at 9:32 AM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,

The Housing Element Team

[Quoted text hidden]

**Housing Element** <housingelement@lacity.org>

---

**Attn Cally Hardy Please examine effect of tree removal in course of development**

2 messages

---

**Patricia Jackson** <[REDACTED]>  
To: housingelement@lacity.org  
Cc: [REDACTED]

Mon, Feb 15, 2021 at 4:50 PM

Hello,

I am writing to express how deeply alarmed I am at the lack of an informed tree policy in the middle of rampant home building and land development all over the city of Los Angeles. A beautiful tree has greater intrinsic value to improved quality of life in a city than a crappy housing development. While homelessness is being trumpeted as the reason so much building is going on, I worked for the U.S. Census as an enumerator this summer and came away with the distinct impression that the city of Los Angeles is engaging in a disjointed housing policy that nowhere includes any kind of description of whether, how and by whom existing housing stock is used. There is a rush to loosen standards with no idea of what is out there and how it is being used.

In addition to trees being destroyed, I have to wonder if it is really necessary to create all these new buildings. Why is so little effort going into an examination of how buildings, businesses and public walkways/spaces are currently being used before we rush to add a bunch of other stuff that is costing all of us a fortune in taxes?

There has been a huge rush to legalize marijuana which has, in the area in which I live, resulted in a deterioration of air quality. Mature, large trees are a mitigating factor I have noticed repeatedly in ensuring that air quality remains tolerable.

Trees bring a sense of peace, belonging and coolness in extreme heat. It is difficult to walk in areas where there are no trees when it is over 100 degrees in summer, but with trees it can be done. If you are serious about reducing the carbon footprint and serious about the fact that you are a competent, environmentally-aware planning agency, you must consider mature, existing trees to be of higher value than simply slapping up another building. There have been a great many tiny home/mobile home innovations that are more relevant to creating housing in the midst of a changing climate than building programs that require permanent destruction of trees that have an essential function in keeping alive people and able to self-move through their environments. If you continue the tree-destructive track you are on with your current development planning structure we will never end our dependence on cars.

You must, must, must prioritize trees and absolutely account for their removal going forward in order to ensure that Los Angeles remains a livable city. Thank you.

Patricia Jackson  
Tel: 818-269-3358  
E-mail: [REDACTED]

---

**Housing Element** <housingelement@lacity.org>  
To: Patricia Jackson <[REDACTED]>

Tue, Feb 16, 2021 at 10:53 AM

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team  
[Quoted text hidden]



Housing Element <housingelement@lacity.org>

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Dietrick Jager <[REDACTED]>

Mon, Jan 25, 2021 at 5:05 PM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

It is disappointing that Planning does not intend to pursue the equitable distribution approach in the housing element update. Planning recently released an Initial Study for the housing element update which contains numerous inadequacies that merit serious concern. Planning's analysis suggests that the City can achieve over 80% of its RHNA target with no significant zoning or policy changes, and that the remaining 20% can be accommodated via already-in-progress community plan updates and changes to the City's Density Bonus program.

The facts do not support these conclusions, and that Planning's "status quo" proposal is flawed for the following reasons:

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Planning anticipates that under current zoning, Los Angeles can expect to build 307,000 more homes between 2022 and 2029. However, Los Angeles only permitted about 114,000 homes during the eight-year period ending in 2019, leading to a net increase of 99,000 homes during that time. Planning offers no convincing rationale for why they expect housing production to nearly triple without significant policy or zoning changes.

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Personally sent by Dietrick Jager using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Dietrick Jager  
1050 Gaviota Ave Apt 5 Long Beach, CA 90813-3847  
[REDACTED]



**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:51 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element <housingelement@lacity.org>

---

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

---

Kyle Jenkins [REDACTED]

Wed, Feb 3, 2021 at 8:25 AM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Kyle Jenkins using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Kyle Jenkins  
12690 Sandhill Ln Los Angeles, CA 90094-3097  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Wed, Feb 3, 2021 at 9:33 AM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,

The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

---

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

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**Divine Johnson** [REDACTED] >

Thu, Jan 28, 2021 at 11:36 AM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Personally sent by Divine Johnson using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Divine Johnson  
2178 Linda Flora Dr Los Angeles, CA 90077-1409  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:57 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Stanley Johnson &lt;[REDACTED]&gt;

Mon, Jan 25, 2021 at 1:38 PM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Stanley Johnson using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Stanley Johnson  
1120 S Grand Ave Apt 1806 Los Angeles, CA 90015-4398  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:46 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element <housingelement@lacity.org>

---

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

---

**Justin Jones** <[REDACTED]>

Mon, Jan 25, 2021 at 2:03 PM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

If you want more housing do a vacancy/underuse tax. Look at all the underused commercial lots that could have housing stacked on top of retail. No need to fight suburban NIMBYs

Also:

Build more rail

Dynamic congestion pricing (toll lanes) on roads

Permit parking in all residential neighborhoods. Raises much needed revenue and discourages junk cars

Sincerely,

Justin Jones

3711 Baldwin St Los Angeles, CA 90031-2965

[REDACTED]

---

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:47 PM

To: [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,

The Housing Element Team

[Quoted text hidden]





Housing Element <housingelement@lacity.org>

---

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

---

Justin Jones [REDACTED]

Wed, Feb 3, 2021 at 3:43 PM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

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If you want more housing do a vacancy/underuse tax. Look at all the under-used commercial lots that could have housing stacked on top of retail. No need to fight suburban NIMBYs

Also:

Protected bike lanes for eScooters/last mile solutions

Build more rail

Dynamic congestion pricing (toll lanes) on roads

Permit parking in all residential neighborhoods - raises much needed revenue and discourages junk cars

Sincerely,

Justin Jones

3711 Baldwin St Los Angeles, CA 90031-2965

[REDACTED]

---

Housing Element <housingelement@lacity.org>

Thu, Feb 4, 2021 at 2:01 PM

To: [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,

The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Fwd: Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

**Flora Melendez** <flora.melendez@lacity.org>  
To: Housing Element <housingelement@lacity.org>

Mon, Jan 25, 2021 at 1:03 PM

Hello.

I'm forwarding an email received by Vince.

Thank you.

~ Angie



**Flora (Angie) Melendez**  
Pronouns: she/hers/her  
Executive Administrative Assistant  
**Los Angeles City Planning**  
200 N. Spring St., Suite 525C  
Los Angeles, CA 90012  
Planning4LA.org  
T: (213) 978-1271 | F: (213) 978-1275  
E: flora.melendez@lacity.org



----- Forwarded message -----

From: **Tami Kagan-Abrams** [REDACTED]  
Date: Mon, Jan 25, 2021 at 1:02 PM  
Subject: Housing Element Environmental Impact Report - Opposition to Status Quo Plan  
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

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Personally sent by Tami Kagan-Abrams using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Tami Kagan-Abrams  
[2430 Hercules Dr Los Angeles, CA 90046-1634](mailto:2430.Hercules.Dr@cityofla.org)  
[REDACTED]

---

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:41 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]

**Housing Element** <housingelement@lacity.org>

---

## Impact of Tree Removals must be Included in Scoping

2 messages

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**Lynnette Kampe** <[REDACTED]>  
To: HousingElement@lacity.org

Mon, Feb 15, 2021 at 12:27 PM

Ms. Hardy,

I request that the impact of tree removals be included in the scoping of the Housing Element. Trees provide vital infrastructure to the city with benefits of improved air quality, reduction of heat island effect, stormwater management and more - contributing to the sustainability and livability of Los Angeles.

Mature trees are often removed for construction projects - often unnecessarily and long before a project permit is even obtained.

Replacement trees are often of smaller species that will never provide the same ecosystem benefits of the trees that were removed - if they survive to maturity at all.

Our urban forest is diminishing at a time when increasing numbers of days of extreme temperatures make them more essential than ever.

I request that the impact of tree removals be considered in the Housing Element and to include these points:

- how can net tree canopy be maintained?
- can 4:1 replacement be required for removal of street trees?
- can mitigation for tree removals on private property be required similar to the canopy protection in Pasadena?
- can alternatives to tree removals be required to be considered in the early planning stages?
- is adequate green space provided for mental and physical health?
- can native habitat be restored by requiring landscaping with native shrubs as well as planting replacement trees when woodlands are destroyed?
- can trees and shrubs that are planted as mitigation for removals of Protected Trees and Shrubs have protected status?
- can tree Root Zone Protection during construction be implemented for street and private trees that are to be preserved?

Thank you,

Lynnette Kampe  
4232 Glenwood Ave.  
Los Angeles, CA 90065  
323-305-4232

---

**Housing Element** <housingelement@lacity.org>  
To: Lynnette Kampe <[REDACTED]>

Tue, Feb 16, 2021 at 10:39 AM

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team  
[Quoted text hidden]



Housing Element <housingelement@lacity.org>

---

## Preserving Trees

2 messages

---

AOL <[REDACTED]>  
To: housingelement@lacity.org

Mon, Feb 15, 2021 at 3:45 PM

Please consider GLOBAL WARMING in making determination about housing.  
Trees must be preserved,  
Thanks,  
Laurie Kelson  
Encino CA 91436

Sent from my iPhone

---

Housing Element <housingelement@lacity.org>  
To: AOL <[REDACTED]>

Tue, Feb 16, 2021 at 10:49 AM

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team  
[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Lindsay Kerns [REDACTED]

Wed, Feb 3, 2021 at 8:37 AM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Lindsay Kerns using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Lindsay Kerns  
1529 N Commonwealth Ave Los Angeles, CA 90027-5513  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Wed, Feb 3, 2021 at 9:35 AM

To [REDACTED]

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Regards,

The Housing Element Team

[Quoted text hidden]



Housing Element <housingelement@lacity.org>

## Fwd: Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

**Flora Melendez** <flora.melendez@lacity.org>  
To: Housing Element <housingelement@lacity.org>

Mon, Jan 25, 2021 at 12:54 PM

Hello.

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Thank you.

~ Angie



LOS ANGELES  
CITY PLANNING

**Flora (Angie) Melendez**  
Pronouns: she/hers/her  
Executive Administrative Assistant  
**Los Angeles City Planning**  
200 N. Spring St., Suite 525C  
Los Angeles, CA 90012  
Planning4LA.org  
T: (213) 978-1271 | F: (213) 978-1275  
E: flora.melendez@lacity.org



----- Forwarded message -----

From: **Sahar Khundmir** [REDACTED]  
Date: Mon, Jan 25, 2021 at 12:53 PM  
Subject: Housing Element Environmental Impact Report - Opposition to Status Quo Plan  
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

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It is disappointing that Planning does not intend to pursue the equitable distribution approach in the housing element update. Planning recently released an Initial Study for the housing element update which contains numerous inadequacies that merit serious concern. Planning's analysis suggests that the City can achieve over 80% of its RHNA target with no significant zoning or policy changes, and that the remaining 20% can be accommodated via already-in-progress community plan updates and changes to the City's Density Bonus program.

The facts do not support these conclusions, and that Planning's "status quo" proposal is flawed for the following reasons:

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Planning anticipates that under current zoning, Los Angeles can expect to build 307,000 more homes between 2022 and 2029. However, Los Angeles only permitted about 114,000 homes during the eight-year period ending in 2019, leading to a net increase of 99,000 homes during that time. Planning offers no convincing rationale for why they expect housing production to nearly triple without significant policy or zoning changes.

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Personally sent by Sahar Khundmiri using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Sahar Khundmiri  
[600 Flower Ave Venice, CA 90291-2700](#)  
[REDACTED]

---

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:40 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

---

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

**Robert King** [REDACTED]

Wed, Feb 3, 2021 at 9:51 AM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Personally sent by Robert King using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Robert King  
3921 Wawona St Los Angeles, CA 90065-3839  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Feb 4, 2021 at 1:56 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,

The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Luke Klipp <[REDACTED]>  
Reply-To: [REDACTED]  
To: vince.bertoni@lacity.org

Mon, Jan 25, 2021 at 3:15 PM

Dear Director of City Planning Vince Bertoni,

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Personally sent by Luke Klipp using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Luke Klipp  
1320 N Hoover St Los Angeles, CA 90027-6008  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:49 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Cindi Knight &lt;[REDACTED]&gt;

Sat, Feb 13, 2021 at 3:52 PM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

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Personally sent by Cindi Knight using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Cindi Knight  
919 Palm Ave South Pasadena, CA 91030-3028  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Tue, Feb 16, 2021 at 10:33 AM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element <housingelement@lacity.org>

# Fwd: Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

**Flora Melendez** <flora.melendez@lacity.org>  
To: Housing Element <housingelement@lacity.org>

Mon, Jan 25, 2021 at 11:45 AM

Hello.

I'm forwarding an email received by Vince.

Thank you.

~ Angie



LOS ANGELES  
CITY PLANNING

**Flora (Angie) Melendez**  
Pronouns: she/hers/her  
Executive Administrative Assistant  
**Los Angeles City Planning**  
200 N. Spring St., Suite 525C  
Los Angeles, CA 90012  
Planning4LA.org  
T: (213) 978-1271 | F: (213) 978-1275  
E: flora.melendez@lacity.org



----- Forwarded message -----

From: **Vince Bertoni** <vince.bertoni@lacity.org>  
Date: Mon, Jan 25, 2021 at 11:37 AM  
Subject: Fwd: Housing Element Environmental Impact Report - Opposition to Status Quo Plan  
To: Flora Melendez <flora.melendez@lacity.org>



LOS ANGELES  
CITY PLANNING

**Vincent P. Bertoni, AICP**  
Pronouns: He, His, Him  
Director of Planning  
**Los Angeles City Planning**  
200 N. Spring St., Suite 525C  
Los Angeles, CA 90012  
Planning4LA.org  
T: (213) 978-1271 | F: (213) 978-1275  
E: vince.bertoni@lacity.org





----- Forwarded message -----

From: **Arjun Kolachalam** [REDACTED]  
Date: Mon, Jan 25, 2021 at 11:34 AM  
Subject: Housing Element Environmental Impact Report - Opposition to Status Quo Plan  
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

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Personally sent by Arjun Kolachalam using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Arjun Kolachalam  
1514 N Avenue 55 Los Angeles, CA 90042-1812  
[REDACTED]

---

**Housing Element** <housingelement@lacity.org>  
To [REDACTED]

Thu, Jan 28, 2021 at 4:39 PM

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team  
[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Ryan Koyanag [REDACTED]

Sat, Feb 13, 2021 at 10:41 PM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Ryan Koyanagi using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Ryan Koyanagi  
1210 Redwood View Dr Pomona, CA 91766-4117  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Tue, Feb 16, 2021 at 10:33 AM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Martha Kriley &lt;[REDACTED]&gt;

Mon, Jan 25, 2021 at 4:02 PM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

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Personally sent by Martha Kriley using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Martha Kriley  
3360 E Foothill Blvd Pasadena, CA 91107-6048  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:50 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

5 messages

Gerald Lam &lt;[REDACTED]&gt;

Wed, Feb 3, 2021 at 8:26 AM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

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Personally sent by Gerald Lam using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Gerald Lam  
1401 Via Andres Palos Verdes Estates, CA 90274-2845  
[REDACTED]

---

**Housing Element** <housingelement@lacity.org>

Wed, Feb 3, 2021 at 9:33 AM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,

The Housing Element Team

[Quoted text hidden]

---

**Mail Delivery Subsystem** [REDACTED]

Wed, Feb 3, 2021 at 9:33 AM

To: housingelement@lacity.org



## Address not found

Your message wasn't delivered to [REDACTED] because the address couldn't be found, or is unable to receive mail.

[LEARN MORE](#)

The response was:

550 5.1.1 The email account that you tried to reach does not exist. Please try double-checking the recipient's email address for typos or unnecessary spaces. Learn more at <https://support.google.com/mail/?p=NoSuchUser> w25sor555910ots.136 - gsmtip

Final-Recipient: rfc822 [REDACTED]

Action: failed

Status: 5.1.1

Diagnostic-Code: smtp; 550-5.1.1 The email account that you tried to reach does not exist. Please try 550-5.1.1 double-checking the recipient's email address for typos or 550-5.1.1 unnecessary spaces. Learn more at

550 5.1.1 <https://support.google.com/mail/?p=NoSuchUser> w25sor555910ots.136 - gsmtip

Last-Attempt-Date: Wed, 03 Feb 2021 09:33:47 -0800 (PST)

----- Forwarded message -----

From: Housing Element &lt;housingelement@lacity.org&gt;

To [REDACTED]

Cc:

Bcc:

Date: Wed, 3 Feb 2021 09:33:34 -0800

Subject: Re: Housing Element Environmental Impact Report - Opposition to Status Quo Plan

----- Message truncated -----

---

**Housing Element** <housingelement@lacity.org>

Wed, Feb 3, 2021 at 9:34 AM



To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

On Wed, Feb 3, 2021 at 8:26 AM Gerald Lam [REDACTED] wrote:  
[Quoted text hidden]

Mail Delivery Subsystem [REDACTED]  
To: housingelement@lacity.org

Wed, Feb 3, 2021 at 9:35 AM



### Address not found

Your message wasn't delivered to [REDACTED] because the address couldn't be found, or is unable to receive mail.

The response from the remote server was:

550 5.1.0 Recipient rejected: [REDACTED]

Final-Recipient: rfc822 [REDACTED]  
Action: failed  
Status: 5.1.0  
Remote-MTA: dns; [mxa.mailgun.org](https://mailgun.org). (52.22.46.128, the server for the domain [REDACTED])  
Diagnostic-Code: smtp; 550 5.1.0 Recipient rejected: [REDACTED]  
Last-Attempt-Date: Wed, 03 Feb 2021 09:35:07 -0800 (PST)

----- Forwarded message -----  
From: Housing Element <housingelement@lacity.org>  
To: [REDACTED]  
Cc:  
Bcc:  
Date: Wed, 3 Feb 2021 09:34:54 -0800  
Subject: Re: Housing Element Environmental Impact Report - Opposition to Status Quo Plan  
----- Message truncated -----



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Gerald Lam &lt;[REDACTED]&gt;

Sat, Feb 13, 2021 at 9:29 AM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

It is disappointing that Planning does not intend to pursue the equitable distribution approach in the housing element update. Planning recently released an Initial Study for the housing element update which contains numerous inadequacies that merit serious concern. Planning's analysis suggests that the City can achieve over 80% of its RHNA target with no significant zoning or policy changes, and that the remaining 20% can be accommodated via already-in-progress community plan updates and changes to the City's Density Bonus program.

The facts do not support these conclusions, and that Planning's "status quo" proposal is flawed for the following reasons:

Planning's "status quo" proposal fails to affirmatively further fair housing, which is required under state law. By planning for most housing growth on parcels where multifamily development is already allowed, the City is steering housing opportunities away from the 75% of the City's residentially-zoned land that is restricted to single-family housing only. This perpetuates historic patterns of segregation and exclusion, and continues to push housing opportunities for lower-income households towards lower-income neighborhoods.

Planning anticipates that under current zoning, Los Angeles can expect to build 307,000 more homes between 2022 and 2029. However, Los Angeles only permitted about 114,000 homes during the eight-year period ending in 2019, leading to a net increase of 99,000 homes during that time. Planning offers no convincing rationale for why they expect housing production to nearly triple without significant policy or zoning changes.

Planning's anticipated site inventory, where they expect the development of 307,000 more homes to occur, likely contains a large number of parcels zoned for multifamily residential development. This suggests that a large number of existing rent-stabilized housing units would be redeveloped under Planning's "status quo" approach, increasing lower-income renter households' risk of displacement.

Planning anticipates accommodating 93,000 homes primarily through a series of community plan updates that are already in progress. However, many draft community plan updates highlighted in the Initial Study, including updates for the Westside, Hollywood, Southwest Valley, Southeast Valley, and Purple Line Transit Neighborhood Plan, are unambitious and do little to create significant amounts of new housing capacity. This approach also allows high-resource neighborhoods whose community plan update processes have not yet started, like Brentwood-Pacific Palisades and Westwood, to avoid zoning reforms that are necessary to accommodate the City's RHNA goal. This is unfair.

I strongly oppose Planning's "status quo" approach to the housing element update, which would do little to meaningfully address unaffordable housing costs, lengthy commutes, poor air quality, displacement of lower-income renters, and segregated neighborhoods. Fortunately, with eight months remaining until housing element updates are due, there is still time to change course and create an equitable, transformative housing element. I urge you to instruct the Department of City Planning to take this important step for Los Angeles' future.

Personally sent by Gerald Lam using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Gerald Lam  
1401 Via Andres Palos Verdes Estates, CA 90274-2845  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Tue, Feb 16, 2021 at 10:31 AM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element <housingelement@lacity.org>

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## Housing Element Public Comment

2 messages

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**Alyssa Lea** [REDACTED]  
To: "housingelement@lacity.org" <housingelement@lacity.org>

Sun, Feb 14, 2021 at 7:11 AM

Sent from [Mail](#) for Windows 10

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 **Planning Department Housing Element comment.pdf**  
54K

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**Housing Element** <housingelement@lacity.org>  
To: Alyssa Lea [REDACTED]

Tue, Feb 16, 2021 at 10:34 AM

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team  
[Quoted text hidden]

Alyssa Leal Moffitt  
3504 Rosewood Avenue  
Los Angeles, CA 90066  
310-390-1189

Cally Hardy  
200 N. Spring Street, Room 750,  
Los Angeles, CA 90012;  
City Planning Associate Case Numbers: CPC-2020-1365-GPA; ENV-2020-6762-EIR

February 14, 2021

Dear Ms. Hardy,

I am a resident of Mar Vista and an Angeleno of 21 years. I am submitting a public comment on the Housing Element and general concerns around the RHNA numbers.

The general concern is that the policies proposed in the Housing Element do not take into consideration the needs of park poor, disadvantaged communities and may lead to more displacement when 'affordable housing' is built in job poor areas at prices above the means of the current communities.

One concern is that the RHNA numbers are concentrated on moderate to above moderate income rather than lower income. These numbers do not seem to reflect the needs of Los Angeles with so many working homeless on our streets. Many tech companies plan to continue work-at-home structures and several middle-income workers have left the city during Covid-19. I see a need to reevaluate the RHNA numbers in order to build housing for those that actually cannot find affordable housing.

Secondly, the Housing first approach is inappropriate for historically red-lined communities that are pollution burdened, severely park poor, and economically disadvantaged. Some of the community plans in South and East Los Angeles date back to 2013 and were generalized; as in the case of Watts and the Southeast Plan. In this plan cultural and historic landmarks, even areas with federal historic landmarks, were not placed in a HPOZ and areas marked on Navigate LA as public facilities/open space (and with community-initiated park plans) are called out as only public facilities, making them open game for housing development in areas that are severely overcrowded and park poor.

Thirdly, these communities need new community plans or other opportunities to determine where they need housing, where they need green space, and how they want to preserve their historic spaces. CEQA Exemptions in these areas take advantage of people who have historically been politically disenfranchised and disengaged due to a concentration of poverty and disadvantage. More time and more effort is due in these areas to account for the many barriers to public engagement that occur in historically red-lined areas.

I urge the Planning Department to make considerations for communities that have not had a voice in the planning of their neighborhoods for 7-8 years, that rely on the CEQA process to voice their needs and concerns, and that need green spaces for healthy environments. As a former New Yorker, I can see the advantage of more density and public transportation but not at the expense of green space or of true equity.

Thank you,

Alyssa Leal Moffitt



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Brianna Lee [REDACTED] &gt;

Mon, Jan 25, 2021 at 5:35 PM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

It is disappointing that Planning does not intend to pursue the equitable distribution approach in the housing element update. Planning recently released an Initial Study for the housing element update which contains numerous inadequacies that merit serious concern. Planning's analysis suggests that the City can achieve over 80% of its RHNA target with no significant zoning or policy changes, and that the remaining 20% can be accommodated via already-in-progress community plan updates and changes to the City's Density Bonus program.

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I strongly oppose Planning's "status quo" approach to the housing element update, which would do little to meaningfully address unaffordable housing costs, lengthy commutes, poor air quality, displacement of lower-income renters, and segregated neighborhoods. Fortunately, with eight months remaining until housing element updates are due, there is still time to change course and create an equitable, transformative housing element. I urge you to instruct the Department of City Planning to take this important step for Los Angeles' future.

Personally sent by Brianna Lee using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Brianna Lee  
1422 HI Point St Unit 105 Los Angeles, CA 90035-4804  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:51 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

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**CPC-2020-1365-GPA; ENV-2020-6762-EIR**

2 messages

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**Andrea Leon-Grossmann** [REDACTED]  
To: housingelement@lacity.org

Mon, Feb 15, 2021 at 4:35 PM

Dear Ms Hardy:

Regarding the EIR for the Housing Element and the community plans there seem to be many issues that seem to be assumed by LA City Planning that is deeply concerning as far as equity and climate change go. As an environmental justice advocate and an immigrant who has been both a renter and a homeowner, I would like to raise many of these concerns.

1) With a gig economy and a culture that demands instant gratification, we must ensure that we are not making assumptions that mixed-used housing is the end-all when it comes to sustainability and that although many may end up working where they live, many more won't as they may get displaced as gig workers are not exploited by an ever-growing industry that pays less than minimum wage and many of those workers would end up traveling farther to make deliveries and short passenger trips while congesting our streets circulating around looking for business. It is already happening to an extent where mixed-use housing exists, I have heard from friends who work for Uber Eats going to Starbucks a block away from the customer's address just because it is raining, or hot.

Besides the emissions from the car driving from far away to the Westside to make a delivery that could have been walked, there is the problem with plastic waste. And that is not just from takeout and delivery, but also from residents who depend on daily deliveries from Amazon and other big box stores. Policies that are implemented in Los Angeles, affect local businesses and beyond. More plastic production means more drilling and more refineries in our city. It also means more warehouses, and most of them are not in LA but in neighboring cities and they also generate emissions and traffic.

Some possible solutions: If upzoning happens in certain areas, declare such areas gig-economy free areas. For deliveries, mandate reusable pods and deliveries may only happen once or twice a week. Our local government must regulate these industries that are poisoning many low-income communities and increasing last mile driven by trucks. An idea for multifamily buildings that can work is to have communal EVs that can be shared for tenants to run errands AND have parking for them. So car-efficient trips do not have to be replaced with delivery trucks (that come with lots of disposable cardboard and plastic). For higher-end buildings, a concierge service with its own delivery personnel who can run errands for the tenants included in the (higher rent) or (higher) HOAs.

2) It is very important to address the way the City is cracking down on Airbnbs. Many [are skirting the law](#) and if it is not properly enforced, adding units so that investors can profit from short-term rentals instead of housing Angelenos will not solve the problem.

3) As we move to go 100% renewable energy, we need to invest in our aging infrastructure like microgrids to make us more resilient. Just a couple of weeks ago we had a 5-hour outage in the Westside because the winds knocked over a pole with transmission lines. If we are going to increase density, we **MUST** include upgrades to our energy and water infrastructure. Any new market-rate development must be required to underground power lines for the entire block, that is what Torrance has been doing for the last 10+ years, and developers should not be able to pay or get a waiver. They should also be mandated to build rainwater storage and pumps to irrigate drought-tolerant landscaping.

4) As I mentioned, the push to electrify buildings from a [health](#) and [climate](#) perspective is critical and the easiest way to start is with new construction. Moreover, [heat pump water heaters act as clean batteries](#), overheating their water when power is cheap. This can help avoid outages by lowering MW demand during peaks. Eliminating gas furnaces for heat pumps that heat your home in the winter and cool your house in the summer is another way to keep all appliances electric and just get ONE appliance instead of two.



5) Los Angeles is the [biggest urban oil field in the nation](#) and as such we have many active oil & gas oil wells and dangerous gas storage facilities and mercaptan operations. There are also many oil wells that are not part of the California Conservation map as they [were simply covered and built on](#), so they must be properly decommissioned if we are to redevelop the area and **ensure no one lives on top of toxic land**. That means no shortcuts or bypassing CEQA or EIRs on projects for the sake of expediency.  
**Human health must come first.**

We have a study by the [California Council Science and Technology](#) that names the SoCalGas Playa del Rey gas storage facility the most dangerous facility in the state. There are about half a million people in the 5-mile evacuation area (determined by LA County Health) should a blowout occur. And according to a [SoCalGas employee deposition](#), the current technology and state of the storage wells, there is a high likelihood of **catastrophic loss of life** should multiple wells fail (like it could during a significant earthquake). Although there is a resolution to study closing this facility, the danger this facility poses must not be ignored while planning land use and adding a significant amount of density if relocation plans and an emergency plan are not in place, like it is the case today (I checked with the fire department).

As far as solar rights, they must be preserved. Not only families have gone through the expense to install the systems and invest in renewable energy, but rooftop solar has far fewer environmental impacts than solar farms that harm the environment and the loss of energy that is lost through transmission. Solar rooftop must also be a requirement for all new construction, not only we need more distributed generation for reliability, a roof with panels is like a cool roof and it is like having additional insulation.

6) Regarding water, we must mandate not only rainwater collection but close the loopholes we have. For multi-family, we should require underground cisterns connected to irrigation systems. Although it is now required to pass code, there is a business to rent the systems to pass code and then once the certificate of occupancy is issued, they are returned. The image below is from a couple of weeks ago on Craig's list:

 [Screen Shot 2020-09-09 at 11.08.45 AM.png](#)

7) We must preserve our tree canopy. [Keeping mature trees is far more important than planting new ones](#). For the new community plan, we must not only require that the rainwater loophole is fixed but that we also require drought-tolerant landscaping (not astroturf that contaminates our waterways with PFAS). For landscaping, we should also require native trees that can flourish with our climate as well as ban and replace palm trees that have more in common with grass than with trees as they generate little to no oxygen, have little shade, generate a lot of trash and are expensive to maintain.

8) We must also find a better way to transport people than the current electric scooters, the Climate Reality Project LA authored a study that found that e-scooters only have a 28-day lifespan and generate a ton of e-waste, [The Guardian](#) has also written about the huge carbon footprint they have.

9) There is little doubt that we must build housing, but we must look at the vacancies that are on the rise. Most vacancies are in luxury (market rate) buildings, while low-income families continue to struggle and some lose the roof over their heads as the financial crisis deepens. We do not need to "incentivize" affordable housing, we must mandate it; otherwise, it will never get built. Developers are in for the money and their advocates (like Abundant Housing) will continue to push for market-based "solutions," the same "solutions" that got us into this hole. We have you, our government, to mandate and regulate these businesses, and ensure the most vulnerable are taken care of. In any event, we also need our city officials to ensure funding to build affordable/public housing gets restored after it was shut down by [Governor Brown in 2011](#) by advocating for it with Sacramento. LA City Planning also needs to take a hard look and assess how many units really need to be built, [The Embarcadero Institute](#) has shed light on the misinformation and overinflated numbers put out by developers and Wall Street who want to deregulate zoning and maximize profits at the expense of climate change. Overbuilding housing would come at a [carbon footprint](#) we simply cannot afford.

There is also little talk about the fact that LA's population is shrinking, not only [people are leaving](#), but there is a significant [decline in the fertility rate](#). So, the overblown projections by developers and their

front groups are even more unrealistic and flawed. Adding the fact that many corporations have now realized that they don't have to pay top dollar for office space and can keep their employees happy and safe working from home, telecommuting has fundamentally changed where people want to live and how they want to live. Anecdotally, the apartment building on [2600 Overland Ave](#), has had vacancies for years (pictures below) and the one on [10951 National Blvd](#) was sold and is being torn down after having vacancies for years as well (it was only built in 1992). And, if you come visit storefronts on Pico Blvd., we have about 25% or more vacancy rate. Building mixed rate housing may end up being a win for Airbnb, yielding more empty storefronts and a negative impact for everyone who lives here and those who desperately need housing.

We must listen to the different communities where the housing is getting built and ensure locals are housed first. We should also build the housing that the community needs and won't displace members of that community. Building luxury housing in a low-income community leads to displacement, and that doesn't mean that low-income housing can't be aesthetically pleasing, it means that if it is high-end it will cause displacement and gentrification.

As much as it pains me to say it, passenger cars are here to stay. Besides the differently-abled people, we also have safety issues. A good example is female bartenders who get off from work late at night. We must ensure our streets are safe for all and our zoning doesn't displace Angelenos. Without a doubt, this pandemic has clearly shown how much we need affordable housing to be built and the massive glut of luxury housing that goes vacant. Our housing element must ensure we build housing to house Angelenos instead of building housing for investors.

I also expect that LA City Planning joins forces with someone like [Redwood Energy](#), an affordable housing developer that builds net-zero affordable housing that is all-electric and efficient. Through the California Debt Limit Allocation Committee and [California Pollution Control Financing Authority](#) there are billions of dollars in public financing that are matched by the federal government to build the affordable housing that we need.

As we move forward, and we emerge from the economic crisis, it is clear many white-collar jobs will forever be changed and telecommuting is now not an option, but a norm. Many who want to live in a larger home away from an urban and can afford it area can do so. But we must look at the vulnerable communities and their communities, not only to build the housing they need but to ensure that the gig economy does not deal another blow too.

Sincerely,  
Andrea Leon-Grossmann  
CD-5

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**Housing Element** <housingelement@lacity.org>

To: Andrea Leon-Grossmann [REDACTED]

Tue, Feb 16, 2021 at 10:52 AM

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team  
[Quoted text hidden]



Housing Element <housingelement@lacity.org>

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## trees

2 messages

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**Barry Levin** [REDACTED]  
To: housingelement@lacity.org

Mon, Feb 15, 2021 at 1:20 PM

Please look at trees as valuable.

They provide shade for cooling, they produce oxygen from carbon dioxide, create habitats for urban wildlife and beauty for a city. They must be included in any city planning. We must protect them and stop removing them at the whim of homeowners who wish to expand their little fiefdoms.

The replacement on one mature tree with two immature trees does not address the true issue of value.

--

Barry E. Levine  
310 497 7500  
8824 David Avenue  
Los Angeles, California 90034

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**Housing Element** <housingelement@lacity.org>  
To: Barry Levin [REDACTED]

Tue, Feb 16, 2021 at 10:40 AM

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team  
[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Olga Lexell &lt;[REDACTED]&gt;

Mon, Jan 25, 2021 at 5:34 PM

Reply-To: o [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

It is disappointing that Planning does not intend to pursue the equitable distribution approach in the housing element update. Planning recently released an Initial Study for the housing element update which contains numerous inadequacies that merit serious concern. Planning's analysis suggests that the City can achieve over 80% of its RHNA target with no significant zoning or policy changes, and that the remaining 20% can be accommodated via already-in-progress community plan updates and changes to the City's Density Bonus program.

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Planning anticipates that under current zoning, Los Angeles can expect to build 307,000 more homes between 2022 and 2029. However, Los Angeles only permitted about 114,000 homes during the eight-year period ending in 2019, leading to a net increase of 99,000 homes during that time. Planning offers no convincing rationale for why they expect housing production to nearly triple without significant policy or zoning changes.

Planning's anticipated site inventory, where they expect the development of 307,000 more homes to occur, likely contains a large number of parcels zoned for multifamily residential development. This suggests that a large number of existing rent-stabilized housing units would be redeveloped under Planning's "status quo" approach, increasing lower-income renter households' risk of displacement.

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I strongly oppose Planning's "status quo" approach to the housing element update, which would do little to meaningfully address unaffordable housing costs, lengthy commutes, poor air quality, displacement of lower-income renters, and segregated neighborhoods. Fortunately, with eight months remaining until housing element updates are due, there is still time to change course and create an equitable, transformative housing element. I urge you to instruct the Department of City Planning to take this important step for Los Angeles' future.

Personally sent by Olga Lexell using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Olga Lexell  
1115 S Elm Dr Los Angeles, CA 90035-1143  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:51 PM

To: Olga Lexel [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Yurhe Lim [REDACTED]

Sat, Feb 13, 2021 at 10:09 AM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

It is disappointing that Planning does not intend to pursue an intentional methodology in which new homes are concentrated near jobs, transit and high-opportunity neighborhoods in the housing element update. Planning recently released an Initial Study for the housing element update which contains numerous inadequacies that merit serious concern. I believe these inadequacies are not being addressed.

Planning's analysis suggests that the City can achieve over 80% of its RHNA target without significant zoning or policy changes, and that the remaining 20% can be accommodated via already-in-progress community plan updates and changes to the City's Density Bonus program.

I believe that the facts do not support these conclusions and that Planning's "status quo" proposal is flawed for the following reasons:

Planning's "status quo" proposal fails to affirmatively further fair housing, which is required under state law. By planning for most housing growth on parcels where multifamily development is already allowed, the City is steering housing opportunities away from the 75% of the City's residentially-zoned land that is restricted to single-family housing only. This perpetuates historic patterns of segregation and exclusion, and continues to push housing opportunities for lower-income households towards lower-income neighborhoods.

Planning suggests that under current zoning, Los Angeles can expect to build 307,000 more homes between 2022 and 2029. But this is to deny the reality that Los Angeles only permitted 114,000 homes during the eight-year period ending in 2019, leading to a net increase of only 99,000 homes during that time. I believe Planning has not offered convincing rationale for why they expect housing production to nearly triple without significant policy or zoning changes.

Planning's anticipated site inventory where they expect the development of 307,000 more homes to occur likely contains a large number of parcels zoned for multifamily residential development. This suggests that a large number of existing rent-stabilized housing units would be redeveloped under Planning's "status quo" approach, increasing lower-income renter households' risk of displacement. I strongly believe that the City should be on the defense in allowing such development during our worsening homelessness crisis.

Planning anticipates accommodating 93,000 homes primarily through a series of community plan updates that are already in progress. However, I believe many draft community plan updates highlighted in the Initial Study (including updates for the Westside, Hollywood, Southwest Valley, Southeast Valley, and Purple Line Transit Neighborhood Plan) are unambitious and do little to create significant amounts of new housing capacity. This approach also allows high-resource neighborhoods whose community plan update processes have not yet started (like Brentwood-Pacific Palisades and Westwood) to avoid zoning reforms that are necessary to accommodate the RHNA goal. I believe this is unfair and that if we don't enforce an equitable, accountable standard to all neighborhoods now these neighborhoods will continue to believe that zoning reforms and updates—which are necessary in every municipality regardless of size or history—do not apply to them.

I strongly oppose Planning's "status quo" approach to the housing element update that cannot meaningfully address our current housing crisis. Fortunately, with 8 months remaining until housing element updates are due, there is still time to create a transformative housing element. I urge you to ask the Department of City Planning to take this important step for Los Angeles' future. I am grateful for our City's Planning department and believe they have the resourcefulness and smarts to make these groundbreaking changes possible.

Sincerely,

Yurhe Lim

1120 S Grand Ave Apt 818 Los Angeles, CA 90015-4380  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Tue, Feb 16, 2021 at 10:32 AM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Fwd: Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

**Flora Melendez** <flora.melendez@lacity.org>  
To: Housing Element <housingelement@lacity.org>

Mon, Jan 25, 2021 at 12:45 PM

Hello.

I'm forwarding an email received by Vince.

Thank you.

~ Angie



**Flora (Angie) Melendez**  
Pronouns: she/hers/her  
Executive Administrative Assistant  
**Los Angeles City Planning**  
200 N. Spring St., Suite 525C  
Los Angeles, CA 90012  
Planning4LA.org  
T: (213) 978-1271 | F: (213) 978-1275  
E: flora.melendez@lacity.org



----- Forwarded message -----

From: **Jasmine Little** >  
Date: Mon, Jan 25, 2021 at 12:44 PM  
Subject: Housing Element Environmental Impact Report - Opposition to Status Quo Plan  
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Personally sent by Jasmine Little using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Jasmine Little  
[508 S Serrano Ave Apt 105 Los Angeles, CA 90020-3908](mailto:508.S.Serrano.Ave.Apt.105@losangeles.gov)  
[REDACTED]

---

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:40 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

---

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

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Jasmine Little <[REDACTED]>

Sat, Feb 13, 2021 at 11:18 AM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Jasmine Little using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Jasmine Little  
508 S Serrano Ave Los Angeles, CA 90020-3942  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Tue, Feb 16, 2021 at 10:32 AM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Nina Long [REDACTED] &gt;

Mon, Jan 25, 2021 at 3:07 PM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Nina Long using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Nina Long  
433 Kelton Ave Los Angeles, CA 90024-2007  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:48 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Terry Luedecke Luedecke - Move &lt;[REDACTED]&gt;

Wed, Jan 27, 2021 at 3:07 PM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Personally sent by Terry Luedecke Luedecke - Move using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Terry Luedecke Luedecke - Move

5427 Hermitage Ave Valley Village, CA 91607-2015  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:57 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element <housingelement@lacity.org>

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## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

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**Terry Luedecke** [REDACTED]

Sun, Feb 14, 2021 at 10:05 AM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

Our long-standing affordable housing shortage happened because of the existing planning approach. It can't be the model anymore. The housing element update in Los Angeles is planning for most housing growth on parcels where multifamily development is already allowed instead on land currently zoned for single-family housing only.

It is disappointing that Planning does not intend to pursue the equitable distribution approach in the housing element update. Planning recently released an Initial Study for the housing element update which contains numerous inadequacies that merit serious concern. Planning's analysis suggests that the City can achieve over 80% of its RHNA target with no significant zoning or policy changes, and that the remaining 20% can be accommodated via already-in-progress community plan updates and changes to the City's Density Bonus program.

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Personally sent by Terry Luedecke using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Terry Luedecke

5427 Hermitage Ave Valley Village, CA 91607-2015  
[REDACTED]



2/16/2021

City of Los Angeles Mail - Housing Element Environmental Impact Report - Opposition to Status Quo Plan

**Housing Element** <housingelement@lacity.org>

Tue, Feb 16, 2021 at 10:36 AM

To: [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team  
[Quoted text hidden]



Housing Element <housingelement@lacity.org>

---

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

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Ian Lundy >

Thu, Feb 11, 2021 at 8:37 PM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Ian Lundy using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Ian Lundy  
1701 Via Arriba Palos Verdes Estates, CA 90274-1234  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Tue, Feb 16, 2021 at 10:24 AM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Tracey Maligalig [REDACTED]

Sun, Feb 14, 2021 at 2:34 PM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

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Personally sent by Tracey Maligalig using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Tracey Maligalig  
17817 Magnolia Blvd Apt 4 Encino, CA 91316-3321  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Tue, Feb 16, 2021 at 10:36 AM

To [REDACTED]

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Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Jake Malott [REDACTED]

Wed, Feb 3, 2021 at 8:28 AM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

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Personally sent by Jake Malott using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Jake Malott  
7190 W Sunset Blvd Los Angeles, CA 90046-4415  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Wed, Feb 3, 2021 at 9:33 AM

To [REDACTED]

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Regards,

The Housing Element Team

[Quoted text hidden]



Housing Element <housingelement@lacity.org>

## Fwd: Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

**Flora Melendez** <flora.melendez@lacity.org>  
To: Housing Element <housingelement@lacity.org>

Mon, Jan 25, 2021 at 11:45 AM

Hello.

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Thank you.

~ Angie



LOS ANGELES  
CITY PLANNING

**Flora (Angie) Melendez**  
Pronouns: she/hers/her  
Executive Administrative Assistant  
**Los Angeles City Planning**  
200 N. Spring St., Suite 525C  
Los Angeles, CA 90012  
Planning4LA.org  
T: (213) 978-1271 | F: (213) 978-1275  
E: flora.melendez@lacity.org



----- Forwarded message -----

From: **Priya Manda** [REDACTED]  
Date: Mon, Jan 25, 2021 at 11:44 AM  
Subject: Housing Element Environmental Impact Report - Opposition to Status Quo Plan  
To: <vince.bertoni@lacity.org>

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Personally sent by Priya Manda using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Priya Manda  
[929 W Jefferson Blvd Los Angeles, CA 90089-1621](mailto:929.W.Jefferson.Bldv@cityofla.org)

---

**Housing Element** <housingelement@lacity.org>  
To [REDACTED]

Thu, Jan 28, 2021 at 4:38 PM

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

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## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

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**Richard Margulieux** [REDACTED]

Tue, Jan 26, 2021 at 5:39 AM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Personally sent by Richard Margulieux using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Richard Margulieux  
453 Holland Ave Los Angeles, CA 90042-3255  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:52 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

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## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Aida Marina [REDACTED] &gt;

Mon, Jan 25, 2021 at 1:56 PM

Reply-To: [REDACTED]  
To: vince.bertoni@lacity.org

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Personally sent by Aida Marina using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Aida Marina  
710 Arroyo Dr South Pasadena, CA 91030-2370  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:46 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element <housingelement@lacity.org>

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## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

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**Robert Masys** <[REDACTED]>

Mon, Jan 25, 2021 at 6:02 PM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

Los Angeles must direct more growth through infill in high-opportunity neighborhoods--equity and justice require this!

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Personally sent by Robert Masys using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization. Thank you for listening to this feedback.

Sincerely,  
Robert Masys

2/16/2021

City of Los Angeles Mail - Housing Element Environmental Impact Report - Opposition to Status Quo Plan

1045 Manzanita St Los Angeles, CA 90029-3011

---

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:51 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

andy ma [REDACTED]

Wed, Jan 27, 2021 at 10:17 AM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by andy may using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

andy may

1901 N New Hampshire Ave Los Angeles, CA 90027-1818  
[REDACTED]



**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:56 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Fwd: Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

**Flora Melendez** <flora.melendez@lacity.org>  
To: Housing Element <housingelement@lacity.org>

Mon, Jan 25, 2021 at 1:04 PM

Hello.

I'm forwarding an email received by Vince.

Thank you.

~ Angie



LOS ANGELES  
CITY PLANNING

**Flora (Angie) Melendez**  
Pronouns: she/hers/her  
Executive Administrative Assistant  
**Los Angeles City Planning**  
200 N. Spring St., Suite 525C  
Los Angeles, CA 90012  
Planning4LA.org  
T: (213) 978-1271 | F: (213) 978-1275  
E: flora.melendez@lacity.org



----- Forwarded message -----

From: **Chris McCain** [REDACTED]  
Date: Mon, Jan 25, 2021 at 1:02 PM  
Subject: Housing Element Environmental Impact Report - Opposition to Status Quo Plan  
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

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Personally sent by Chris McCain using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Chris McCain  
[6201 Springvale Dr Los Angeles, CA 90042-2019](mailto:6201SpringvaleDr@cityofla.org)

---

**Housing Element** <housingelement@lacity.org>  
To [REDACTED]

Thu, Jan 28, 2021 at 4:42 PM

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]

**Housing Element** <housingelement@lacity.org>

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**CPC-2020-1365-GPA ENV 2020 6762 EIR**

3 messages

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**Jeanne McConnell** <[REDACTED]>  
To: "housingelement@lacity.org" <housingelement@lacity.org>  
Cc: [REDACTED]

Mon, Feb 15, 2021 at 11:15 AM

Dear Ms. Hardy:

We are co-founders for Angelenos for Trees. Angelenos for Trees is a community group united Los Angeles neighborhoods to preserve and regenerate Los Angeles rapidly shrinking tree canopy. The majority of Los Angeles trees are on private land and more particularly residential lots. A resilient and sustainable tree canopy should be at least 45% to obtain the maximum environmental benefit from trees. These environmental benefits include reduced energy use, cooler temperatures, cleaner air, storm water management and better water quality. Based on a recent Lidar study conducted by TreePeople and Loyola Marymount the City of Los Angeles had a tree canopy of 25% as of 2016.

The USC Dornsife found between 2000-2009 Los Angeles lost anywhere between 14-55% of its trees canopy due to mass-produced dwellings, home expansions and other "hardscaped features" of a single family lots. The current Housing Element 2021-2020 fails to consider the effect of added housing on existing trees. Mature trees have a cumulative environmental significance, and tree planting is not a mitigation. It can take up to 30 years for a tree to mature. Cities across the United States, including Seattle, Austin and New York, consider trees to be as important as other infrastructure and require developers to preserve the existing mature trees. Notably, in the USC Dornsife study, the City of Pasadena did not experience the same loss of tree canopy because it encourages tree preservation in its development projects.

We strongly encourage the City to consider not only the environmental value of trees but also the social impact of green space amongst its citizens. Trees have been shown to increase home values, decrease crime and increase spending in retain corridors.

Based on both the environmental and positive social benefits of trees, Angelenos for Trees believes it is imperative the City consider the impact of tree removals associated with development within the EIR along with the potential further loss of the tree canopy.

Jeanne McConnell and Jacky Surber

Co- Founders Angelenos for Trees

---

**Jeanne McConnell** <[REDACTED]>  
To: "housingelement@lacity.org" <housingelement@lacity.org>  
Cc: [REDACTED]

Mon, Feb 15, 2021 at 1:27 PM

[Quoted text hidden]

323-363-8397

**Housing Element** <housingelement@lacity.org>

Tue, Feb 16, 2021 at 10:41 AM

To: [REDACTED]

Cc: [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team  
[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

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## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

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**Sean McCormick** [REDACTED]

Mon, Jan 25, 2021 at 1:10 PM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

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Personally sent by Sean McCormick using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Sean McCormick  
3535 Dunn Dr Apt 105 Los Angeles, CA 90034-4975  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:43 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Victoria McCormick [REDACTED] &gt;

Sat, Feb 13, 2021 at 1:20 PM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

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Personally sent by Victoria McCormick using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Victoria McCormick  
11325 198th St E Graham, WA 98338-8129  
[REDACTED]



**Housing Element** <housingelement@lacity.org>

Tue, Feb 16, 2021 at 10:32 AM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

**Eduardo Mendoza** [REDACTED]  
Reply-To [REDACTED]  
To: vince.bertoni@lacity.org

Mon, Jan 25, 2021 at 3:03 PM

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

It is disappointing that Planning does not intend to pursue the equitable distribution approach in the housing element update. Planning recently released an Initial Study for the housing element update which contains numerous inadequacies that merit serious concern. Planning's analysis suggests that the City can achieve over 80% of its RHNA target with no significant zoning or policy changes, and that the remaining 20% can be accommodated via already-in-progress community plan updates and changes to the City's Density Bonus program.

The facts do not support these conclusions, and that Planning's "status quo" proposal is flawed for the following reasons:

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Personally sent by Eduardo Mendoza using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Eduardo Mendoza  
3431 Montclair St Los Angeles, CA 90018-2438  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:48 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

**Andrew Menotti** [REDACTED]

Wed, Feb 3, 2021 at 9:40 AM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Personally sent by Andrew Menotti using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Andrew Menotti  
18345 Calvert St Tarzana, CA 91335-7004  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Feb 4, 2021 at 1:56 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,

The Housing Element Team

[Quoted text hidden]



Cases CPC-2020-1365 GPA; ENV 2020- 6762 EIR

2 messages

Janine Milne [redacted]
To: housingelement@lacity.org

City of Los Angeles
Department of City Planning
Attn: Cally Hardy

I urge the City of Los Angeles to consider the effect of added housing on existing trees.

The environmental impact of the removal of trees for development must be examined in the EIR. Los Angeles' urban canopy is in crisis due to overbuilding and the Cities neglect to protect it.

Best,
Janine Milne
4304 Goodland Ave.
Studio City 91604

\*\* Please don't forget to update your records \*\*

NEW EMAIL:



Housing Element <housingelement@lacity.org>
To: Janine Milne [redacted]

Tue, Feb 16, 2021 at 10:40 AM

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Fleur Mitchell &lt;[REDACTED]&gt;

Wed, Feb 3, 2021 at 1:36 PM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Fleur Mitchell  
610 Boccaccio Ave Venice, CA 90291-4809  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Feb 4, 2021 at 2:00 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,

The Housing Element Team

[Quoted text hidden]





Housing Element &lt;housingelement@lacity.org&gt;

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**Case Numbers: CPC-2020-1365-GPA; ENV-2020-6762-EIR**

2 messages

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**D. Mogerman** <[REDACTED]>  
To: "housingelement@lacity.org" <housingelement@lacity.org>  
Cc: [REDACTED]  
[REDACTED]

Mon, Feb 15, 2021 at 3:10 PM

Dear Cally Hardy,

As a stakeholder in Mar Vista and Board member of the West Mar Vista Residence Assoc. I'm writing as an individual, to express my concern about the rampant destruction of trees for the sake of development. Mature trees offer so many more benefits that new young replacement trees can not.

If you look at the more affluent neighborhoods of Los Angeles you will see that trees are more plentiful. There is a big disparity of trees in poorer areas and this has an effect on quality of life. Please make saving these trees a priority.

Thank you, Dennis Mogerman 310-397-8863

|

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**Housing Element** <housingelement@lacity.org>  
To: "D. Mogerman" <[REDACTED]>

Tue, Feb 16, 2021 at 10:46 AM

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team  
[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

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## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

3 messages

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**john molloy** [REDACTED]

Sun, Feb 14, 2021 at 7:01 PM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

I think that Abundant Housing makes some good points in their assessment of the needs of the Housing Element planning process.

which should be considered as we move forward. We are going to need a vigorous approach to the density issue,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Personally sent by John Molloy using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

john molloy  
2102 Century Park Ln Apt 413 Los Angeles, CA 90067-3306

[Redacted]

**Housing Element** <housingelement@lacity.org>

Tue, Feb 16, 2021 at 10:37 AM

To [Redacted]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]

**Mail Delivery Subsystem** [Redacted]

Tue, Feb 16, 2021 at 10:37 AM

To: housingelement@lacity.org



### Address not found

Your message wasn't delivered to [Redacted] because the domain [Redacted] couldn't be found. Check for typos or unnecessary spaces and try again.

The response was:

DNS Error: 9807461 DNS type 'mx' lookup of [Redacted] responded with code NXDOMAIN Domain name not found: [Redacted]

Final-Recipient: rfc822 [Redacted]  
Action: failed  
Status: 4.0.0  
Diagnostic-Code: smtp; DNS Error: 9807461 DNS type 'mx' lookup of [Redacted] responded with code NXDOMAIN Domain name not found [Redacted]  
Last-Attempt-Date: Tue, 16 Feb 2021 10:37:19 -0800 (PST)

----- Forwarded message -----  
From: Housing Element <housingelement@lacity.org>  
To [Redacted]  
Cc:  
Bcc:  
Date: Tue, 16 Feb 2021 10:37:08 -0800  
Subject: Re: Housing Element Environmental Impact Report - Opposition to Status Quo Plan  
----- Message truncated -----



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Paul Moorman &gt;

Tue, Feb 16, 2021 at 8:49 AM

Reply-To &gt;

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Paul Moorman using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Paul Moorman  
1210 N Flores St West Hollywood, CA 90069-2913  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Tue, Feb 16, 2021 at 11:07 AM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

---

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

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**Greg Morrow** <[REDACTED]>

Mon, Jan 25, 2021 at 1:24 PM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

I encourage you to take a leadership role in fixing LA's chronic inability to meet its housing needs. In my UCLA PhD dissertation (The Homeowner Revolution: Democracy, Land Use and the Los Angeles Slow-Growth Movement, 1965-1992), I explored the origins of LA's housing crisis. One of the main culprits is that the city has down-zoned too much land beginning in the 1970s and has placed the burden of growth on lower-income communities of color to accommodate virtually all of LA's future growth through restrictive land use policies in the highest opportunity areas of the city. This is not only unfair but also assures LA's high housing costs will push more and more people out, hindering its ability to attract talent and undermining its potential.

Each community across the City should do its fair share to accommodate new housing. Each community in LA should be responsible for a fair share of the city's RHNA housing target. The new community plan updates are not demanding this -- indeed, it is reifying the existing pattern of exclusion through a largely "status quo" planning process. I was horrified when I attended a community plan meeting some time ago in Woodland Hills where planners explicitly affirmed a goal of maintaining the status quo. Communities like ours in Woodland Hills can accommodate more housing -- along major streets and near Major Transit Stops -- without any impact to our many single-family communities. But this approach must also be taken in other high opportunity areas across LA. I am an LA homeowner, but it is homeowner politics, not sound planning, that is guiding these poor decisions.

I strongly oppose City Planning's "status quo" approach to the housing element update, which would do little to meaningfully address unaffordable housing costs, lengthy commutes, poor air quality, displacement of lower-income renters, and segregated neighborhoods. Fortunately, with eight months remaining until housing element updates are due, there is still time to change course and create an equitable, transformative housing element. LA urgently needs your leadership - I urge you to require each community plan to take a fair share of LA's RHNA target.

Sincerely,  
Greg Morrow  
19737 Hamlin St Woodland Hills, CA 91367-2813  
[REDACTED]

---

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:45 PM

To: [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

---

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

**Babak Mozaffar** [REDACTED]

Mon, Jan 25, 2021 at 2:15 PM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Babak Mozaffari using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Babak Mozaffari

525 Santa Monica Blvd Apt 404 Santa Monica, CA 90401-3613  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:47 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]





Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Sandra Mukasa [REDACTED] &gt;

Tue, Jan 26, 2021 at 10:32 PM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Planning's "status quo" proposal fails to affirmatively further fair housing, which is required under state law. By planning for most housing growth on parcels where multifamily development is already allowed, the City is steering housing opportunities away from the 75% of the City's residentially-zoned land that is restricted to single-family housing only. This perpetuates historic patterns of segregation and exclusion, and continues to push housing opportunities for lower-income households towards lower-income neighborhoods.

Planning anticipates that under current zoning, Los Angeles can expect to build 307,000 more homes between 2022 and 2029. However, Los Angeles only permitted about 114,000 homes during the eight-year period ending in 2019, leading to a net increase of 99,000 homes during that time. Planning offers no convincing rationale for why they expect housing production to nearly triple without significant policy or zoning changes.

Planning's anticipated site inventory, where they expect the development of 307,000 more homes to occur, likely contains a large number of parcels zoned for multifamily residential development. This suggests that a large number of existing rent-stabilized housing units would be redeveloped under Planning's "status quo" approach, increasing lower-income renter households' risk of displacement.

Planning anticipates accommodating 93,000 homes primarily through a series of community plan updates that are already in progress. However, many draft community plan updates highlighted in the Initial Study, including updates for the Westside, Hollywood, Southwest Valley, Southeast Valley, and Purple Line Transit Neighborhood Plan, are unambitious and do little to create significant amounts of new housing capacity. This approach also allows high-resource neighborhoods whose community plan update processes have not yet started, like Brentwood-Pacific Palisades and Westwood, to avoid zoning reforms that are necessary to accommodate the City's RHNA goal. This is unfair.

I strongly oppose Planning's "status quo" approach to the housing element update, which would do little to meaningfully address unaffordable housing costs, lengthy commutes, poor air quality, displacement of lower-income renters, and segregated neighborhoods. Fortunately, with eight months remaining until housing element updates are due, there is still time to change course and create an equitable, transformative housing element. I urge you to instruct the Department of City Planning to take this important step for Los Angeles' future.

Personally sent by Sandra Mukasa using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Sandra Mukasa  
742 S Harvard Blvd Los Angeles, CA 90005-2557  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:56 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

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## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

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**Toby Muresianu** <[REDACTED]>

Tue, Jan 26, 2021 at 5:30 PM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

I'm disappointed to see that the housing element update in LA does not include more housing on the Westside, where I am a homeowner, and instead pushes the burden to lower income communities.

We say we want to help the environment. When multiple studies from Berkeley find that building more infill housing near jobs is the best way to reduce emissions, we should listen.

We say we want to fight systemic racism. We know that much of West LA was segregated, in part with single-family-home-only zoning laws still on the books and working as intended (my area, Brentwood, is 84% white in a 30% white city), but keep defending them.

We say we are a city that welcomes immigrants. But we won't build housing for them.

We say people not having homes is a crisis. Then we try to lowball our housing targets for the next decade.

We say we listen to science, then reject our own universities' studies in favor of conspiracy theories about millions of secret vacant units somewhere to justify inaction.

And all for what?

What's wrong with housing?

I don't think there's anything wrong with multifamily housing. I don't think there's anything wrong with people who live in it.

But none of this resistance makes sense unless one does.

Are we really doing all this to help wealthy homeowners guarantee their investments will continue to skyrocket during a shortage?

To avoid them having to look at small apartments? And then calling ourselves progressives?

It's time to stop.

Planning's proposal fails to affirmatively further fair housing, which is required under state law. By planning for most housing growth on parcels where multifamily development is already allowed, the City is steering housing opportunities away from the 75% of the City's residentially-zoned land that bans it.

Planning anticipates that under current zoning, Los Angeles can expect to build 307,000 more homes between 2022 and 2029. However, Los Angeles only permitted about 114,000 homes during the eight-year period ending in 2019, leading to a net increase of 99,000 homes during that time. Planning offers no convincing rationale for why they expect housing production to nearly triple without significant policy or zoning changes.

Planning's anticipated site inventory, where they expect the development of 307,000 more homes to occur, likely contains a large number of parcels zoned for multifamily residential development. This suggests that a large number of existing rent-stabilized housing units would be redeveloped under Planning's "status quo" approach, increasing lower-income renter households' risk of displacement.

Planning anticipates accommodating 93,000 homes primarily through a series of community plan updates that are already in progress. However, many draft community plan updates highlighted in the Initial Study, including updates for the Westside, Hollywood, Southwest Valley, Southeast Valley, and Purple Line Transit Neighborhood Plan, are unambitious and do little to create significant amounts of new housing capacity. This approach also allows high-resource

neighborhoods whose community plan update processes have not yet started, like Brentwood-Pacific Palisades and Westwood, to avoid zoning reforms that are necessary to accommodate the City's RHNA goal. This is unfair.

I strongly oppose Planning's "status quo" approach to the housing element update, which would do little to meaningfully address unaffordable housing costs, lengthy commutes, poor air quality, displacement of lower-income renters, and segregated neighborhoods. Fortunately, with eight months remaining until housing element updates are due, there is still time to change course and create an equitable, transformative housing element. I urge you to instruct the Department of City Planning to take this important step for Los Angeles' future.

Personally sent by Toby Muresianu using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Toby Muresianu  
621 S Barrington Ave Los Angeles, CA 90049-4438  
[REDACTED]

---

**Housing Element** <housingelement@lacity.org>  
To [REDACTED]

Thu, Jan 28, 2021 at 4:53 PM

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element <housingelement@lacity.org>

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## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

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Lorenzo Mutia [REDACTED]

Mon, Jan 25, 2021 at 2:16 PM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

It is disappointing that Planning does not intend to pursue the equitable distribution approach in the housing element update. Planning recently released an Initial Study for the housing element update which contains numerous inadequacies that merit serious concern. Planning's analysis suggests that the City can achieve over 80% of its RHNA target with no significant zoning or policy changes, and that the remaining 20% can be accommodated via already-in-progress community plan updates and changes to the City's Density Bonus program.

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Planning's anticipated site inventory, where they expect the development of 307,000 more homes to occur, likely contains a large number of parcels zoned for multifamily residential development. This suggests that a large number of existing rent-stabilized housing units would be redeveloped under Planning's "status quo" approach, increasing lower-income renter households' risk of displacement.

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Personally sent by Lorenzo Mutia using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Lorenzo Mutia

8400 Snowden Ave Panorama City, CA 91402-4058  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:47 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Paras Nanavati &lt;[REDACTED]&gt;

Mon, Jan 25, 2021 at 1:11 PM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Personally sent by Paras Nanavati using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Paras Nanavati  
2285 Cove Ave Los Angeles, CA 90039-3664  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:43 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]





Housing Element <housingelement@lacity.org>

## Re: Notice of Preparation of Housing Element EIR and Scoping Meeting Dates / Aviso sobre la Preparación del Informe de Impacto Ambiental del Elemento de Vivienda y fechas para las Reuniones de Alcance Público

2 messages

Patricia Nettleship [REDACTED]

Sun, Jan 17, 2021 at 11:34 AM

To [REDACTED]

Cc [REDACTED]

This document would undoubtedly be useful for planners; it is not even vaguely useful for public comments on changes (which are difficult to find and understand). The document mentions residential 34 times but doesn't address the major changes in residential codes proposed for adding MIL (mother-in-law) units to existing structures (including conversions of garages and carports without the current requirement to replace offstreet parking).

If you really want public comments then perhaps something with descriptions of changes might be more useful. I am very interested as one of our properties currently has two casitas and the structures are in place to convert two more, if it meets with zoning and housing plan changes. We would like to offer our intern students at UCLA reasonable accommodations within bicycle or bus ride distance to campus.

On Wed, Jan 13, 2021 at 5:00 PM Los Angeles City Planning <housingelement@lacity.org> wrote:



*Para ver en español, desliza hacia abajo*

### Interested Parties,

This email is to inform you that the Notice of Preparation (NOP) and Initial Study for the Housing Element Environmental Impact Report (EIR) are now available [online](#). These documents are being prepared by Los Angeles City Planning as part of the [Plan to House LA](#).

The review and response period for the NOP is from January 13, 2021 through February 15, 2021. Pursuant to CEQA Guidelines Section 15082(b), written responses to this NOP

must be provided during this response period. Additional information regarding the proposed project, and how to provide comments, is provided in the NOP.

### Notice of Preparation

Additionally, the NOP provides notice of two upcoming Public Scoping Meetings for the project. The date, time, and virtual location of the Public Scoping Meetings are as follows. Please refer to the NOP for additional information regarding the meetings and how you can participate.

### Scoping Meeting Dates

*Note: content presented will be the same at both meetings.*

#### Tuesday, January 26, 2021

5:15 p.m. - 6:30 p.m.

#### Join Webinar

##### Webinar ID:

733-042-203 (English) | 248-966-475 (Spanish)

#### Thursday, January 28, 2021

11:15 p.m. - 12:30 p.m.

#### Join Webinar

##### Webinar ID:

715-621-491 (English) | 679-132-603 (Spanish)

### Estimadas partes interesadas:

Este correo electrónico es para informarle que el Aviso de Preparación (NOP, por sus siglas en inglés) y el Estudio Inicial para el Informe de Impacto Ambiental (EIR, por sus siglas en inglés) del Elemento de Vivienda se encuentran ahora disponibles en internet. Estos documentos están siendo preparados por el Departamento de Planeación de la Ciudad de Los Ángeles como parte de la Actualización del Plan de Vivienda.

El período de revisión y respuesta para el Aviso de Preparación (NOP, por sus siglas en inglés) es del 13 de enero del 2021 al 15 de febrero del 2021. De conformidad con la Sección 15082 (b) de las Pautas del CEQA (por sus siglas en inglés), comentarios escritos en respuesta al Aviso de Preparación deben enviarse durante este período de respuesta. En el Aviso de Preparación se ofrece información adicional sobre el proyecto que ha sido propuesto y cómo puede enviar sus comentarios.

### Aviso de Preparación

En el Aviso de Preparación (NOP) también se incluye un aviso sobre las próximas dos reuniones de alcance público para este proyecto. La fecha, hora y ubicación virtual de las reuniones de alcance público son las siguientes. Consulte el Aviso de Preparación (NOP) para obtener información adicional sobre las reuniones y cómo puede participar.

## FECHAS DE LAS REUNIONES DE ALCANCE PÚBLICO

*Nota: el contenido de la presentación será el mismo en las dos reuniones.*

**Martes, 26 de enero del 2021**  
a las 5:15 p.m. - 6:30 p.m.

Unirse al seminario web

### ID del Seminario Web:

733-042-203 (para Inglés) | 248-966-475 (para Español)

**Jueves, 28 de Enero del 2021**  
a las 11:15 p.m. - 12:30 p.m.

Unirse al seminario web

### ID del Seminario Web:

715-621-491 (Para Inglés) | 679-132-603 (Para Español)

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Los Angeles City Planning | [Planning4LA.org](http://Planning4LA.org)



Los Angeles City Planning | 200 N. Spring St, Room 525, Los Angeles, CA 90012

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Try email marketing for free today!

**Housing Element** <[housingelement@lacity.org](mailto:housingelement@lacity.org)>

Thu, Jan 28, 2021 at 4:26 PM

To: Patricia Nettleship [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed. Please note that this Notice of Preparation is for the EIR that is being prepared as part of the Update to the City's Housing Element. You can find out more information about the Housing Element Update, including an overview of the proposed draft plan concepts, on the project's website: <https://planning.lacity.org/plans-policies/housing-element-update>

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

---

**City of Los Angeles, Department of City Planning ATTN: Cally Hardy, City Planning Associate. Case #'s CPC-2020-1365-GPA; ENV-2020-6762-EIR**

2 messages

---

**Christina Newland** [REDACTED]  
To: housingelement@lacity.org

Tue, Feb 16, 2021 at 2:48 PM

Hello,

My comments today address the rezoning of acreage and removal of protected California oak trees. Requests have been made to LOF and been ignored for several years for an Environmental Impact Study, and a traffic flow study.

Rezoning of 4+ acres to put 14 prefab homes that clash with the 1965 residential neighborhood design is wrong. A change from a RE-20 to an RE-11 would create an overload and is not addressing the housing issue. The damage to the infrastructure would be serious.

Cutting of protected California Oaks is a tragedy when you consider it takes 60 + years to get an oak the size on the existing trees and trees stabilize hillsides. Transplanting oaks because of their long tap root is not an option as well as replanting 18" oaks as replacements is a poor substitute.

Note: The street [4875 Onteora Way, Los Angeles, Ca. 90041](#) is a single one entry / one exit road onto a small street Kerwin Place which is a small cul-de-sac with one entry/one exit.

We are totally opposed to this project, rezoning, and tree removal.

Thank you for your time.

Christina Newland and family  
323-257-5366

[REDACTED]

---

**Housing Element** <housingelement@lacity.org>

Tue, Feb 16, 2021 at 4:27 PM

To: Christina Newland &lt;[REDACTED]&gt;

Thank you for your email. Your comment was submitted after the deadline for comments; the comment is marked late, but has been received and will be included in the environmental case file.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element <housingelement@lacity.org>

---

## City Planning Associate Case Numbers: CPC-2020-1365-GPA; ENV-2020-6762-EIR

2 messages

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Diana <[REDACTED]>  
To: housingelement@lacity.org

Tue, Feb 16, 2021 at 12:33 PM

City of Los Angeles, Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012  
ATTN: Cally Hardy

RE: Case Numbers: CPC-2020-1365-GPA; ENV-2020-6762-EIR

The subject Environmental Impact Report (EIR) falls far short because it completely overlooks the impact of added housing on the urban forest. It's common for a developer in Los Angeles to buy a mature-treed property, cut the trees down, halve the amount of permeable land by putting up a larger building or buildings.

The steady removal of mature trees paired with the loss of land available to plant them on is one reason cities see a decline in tree canopy. Despite LA's "Million Trees" tree planting campaign, Los Angeles tree cover declined along with the potential to increase tree canopy cover as the amount of land available to be planted was covered over with larger houses, paved with driveways and hardscaped, according to a study published in *Urban Forestry & Urban Greening* by a team led by USC researchers (Lee et al. 2017).

The City's handling of this environmental review, ignoring the impact of added housing on the urban forest is profoundly disappointing. In urban areas, trees cool temperatures, clean the air, catch storm water run-off, provide habitat for birds and pollinators. The EIR, combined with the City's ongoing failure to protect existing trees during the development and redevelopment process, ensures that conditions in Los Angeles will continue to deteriorate.

Sincerely,

diana nicole  
conservation & ecological landscaper  
it takes a garden  
Los Angeles, CA

---

Housing Element <housingelement@lacity.org>  
To: Diana <[REDACTED]>

Tue, Feb 16, 2021 at 4:26 PM

Thank you for your email. Your comment was submitted after the deadline for comments; the comment is marked late, but has been received and will be included in the environmental case file.

2/16/2021

City of Los Angeles Mail - City Planning Associate Case Numbers: CPC-2020-1365-GPA; ENV-2020-6762-EIR

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element <housingelement@lacity.org>

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## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

---

**Mehile Nomowsky** [REDACTED] >

Thu, Feb 4, 2021 at 10:37 PM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

I strongly oppose allowing residents of new TOC developments to participate in the street parking permit program by LADOT, which would do little to meaningfully address unaffordable housing costs, lengthy commutes, poor air quality, displacement of lower-income renters, and segregated neighborhoods. Fortunately, with eight months remaining until housing element updates are due, there is still time to change course and create an equitable, transformative city parking permit program. I urge you to instruct the Department of City Planning to take this important step for Los Angeles' future.

Personally sent by Mehile Nomowsky using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Mehile Nomowsky  
1635 N Vista St Los Angeles, CA 90046-2817  
[REDACTED]

---

**Housing Element** <housingelement@lacity.org>

Fri, Feb 5, 2021 at 8:51 AM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]





Housing Element &lt;housingelement@lacity.org&gt;

---

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

**Brendan O'Donnell** [REDACTED]

Sat, Jan 30, 2021 at 1:41 PM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

It is disappointing that Planning does not intend to pursue the equitable distribution approach in the housing element update. Planning recently released an Initial Study for the housing element update which contains numerous inadequacies that merit serious concern. Planning's analysis suggests that the City can achieve over 80% of its RHNA target with no significant zoning or policy changes, and that the remaining 20% can be accommodated via already-in-progress community plan updates and changes to the City's Density Bonus program.

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Personally sent by Brendan O'Donnell using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Brendan O'Donnell

1115 Princeton St Apt B Santa Monica, CA 90403-4719  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Mon, Feb 1, 2021 at 9:34 AM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

---

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

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**Beverly Orange** [REDACTED] >

Thu, Feb 4, 2021 at 10:18 AM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Beverly Orange using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Beverly Orange  
509 E Lancaster Blvd # BLV6 Lancaster, CA 93535-3145  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Feb 4, 2021 at 2:02 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,

The Housing Element Team

[Quoted text hidden]



Housing Element <housingelement@lacity.org>

---

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

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Tanya Ortiz [REDACTED]

Sat, Feb 13, 2021 at 10:39 AM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Personally sent by Tanya Ortiz using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Tanya Ortiz  
1217 N Edgemont St Los Angeles, CA 90029-1590  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Tue, Feb 16, 2021 at 10:32 AM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Nicholas Paganini &lt;n[REDACTED]&gt;

Mon, Jan 25, 2021 at 2:34 PM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Nicholas Paganini using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Nicholas Paganini  
606 Naomi St Redlands, CA 92374-4157  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:48 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]





Housing Element &lt;housingelement@lacity.org&gt;

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## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

**Christopher Palencia** [REDACTED]

Wed, Feb 3, 2021 at 9:21 AM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Christopher Palencia using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Christopher Palencia  
741 S Mansfield Ave Los Angeles, CA 90036-4328  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Feb 4, 2021 at 9:57 AM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,

The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

3 messages

George Papanikolas &lt;[REDACTED]&gt;

Sat, Feb 13, 2021 at 9:31 AM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by George Papanikolas using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
George Papanikolas  
2379 Venus Dr Los Angeles, CA 90046-1643  
[REDACTED]

---

**Housing Element** <housingelement@lacity.org>

Tue, Feb 16, 2021 at 10:31 AM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]

---

**George Papanikolas** <[REDACTED]>

Tue, Feb 16, 2021 at 10:46 AM

To: Housing Element &lt;housingelement@lacity.org&gt;

Can you explain why it's taking three months for LABS to get a building permit to do a remodel on my home? Do you know how much that costs in carrying costs? This is why everything is so expensive and impossible to get done in the city.

George Papanikolas  
Mobile: 1-323-547-2347

[REDACTED]  
[REDACTED]

On Feb 16, 2021, at 10:31 AM, Housing Element <housingelement@lacity.org> wrote:

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Michael Pepe <[REDACTED]>  
Reply-To: [REDACTED]  
To: vince.bertoni@lacity.org

Mon, Jan 25, 2021 at 1:41 PM

Dear Director of City Planning Vince Bertoni,

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Personally sent by Michael Pepe using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Michael Pepe  
2375 E 3395 S Salt Lake City, UT 84109-3037  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:46 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

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## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

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**Benjamin Phelps** >

Thu, Jan 28, 2021 at 12:50 AM

Reply-To &gt;

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Benjamin Phelps using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Benjamin Phelps  
1628 1/2 Edgecliffe Dr Los Angeles, CA 90026-1151  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:57 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]





Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Alan Pick &lt;[REDACTED]&gt;

Sat, Feb 13, 2021 at 12:08 PM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

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Personally sent by Alan Pick using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Alan Pick  
422 Howland Canal Venice, CA 90291-4620  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Tue, Feb 16, 2021 at 10:32 AM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element <housingelement@lacity.org>

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## Scoping element comments

2 messages

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**Dick Platkin** [REDACTED] >  
To: housingelement@lacity.org

Mon, Feb 15, 2021 at 11:59 AM

I would like to see the following addressed in the DEIR for the Housing Element.

- 1) The amount of remaining zoning capacity in each Community Plan area, including commercial and manufacturing zones that allow R3 and/or R4 apartments by-right?
- 2) The amount of additional housing that can be added through ministerial approvals in each Community Plan area through Accessory Dwelling Units, Junior Accessory Dwelling Units, and small mobile houses?
- 3) The amount of housing that could be added within each Community Plan area through existing Density Bonus Ordinances, whether TOC Guidelines, CPIOs, Community Benefit Agreements, or SB 1818.
- 4) The status of local infrastructure and public services to support additional people and residences in each Community Plan area?
- 5) Latest information on vacancy rates for middle income and luxury apartments in each Community Plan area?
- 6) The monitoring of housing trends that will take place to determine if the Housing Element's policies and program are rolled out and if they are effective in meeting the element's goals?

Richard (Dick) Platkin, AICP  
6400 W. 5th Street, Los Angeles, CA 90048-4710  
[REDACTED]  
Cell 1-213-308-6354

---

**Housing Element** <housingelement@lacity.org>  
To: Dick Platkin [REDACTED] >

Tue, Feb 16, 2021 at 10:38 AM

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team  
[Quoted text hidden]



Housing Element <housingelement@lacity.org>

---

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

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Elias Platte-Bermeo [REDACTED]

Mon, Feb 1, 2021 at 12:00 AM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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The facts do not support these conclusions, and that Planning's "status quo" proposal is flawed for the following reasons:

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Planning anticipates that under current zoning, Los Angeles can expect to build 307,000 more homes between 2022 and 2029. However, Los Angeles only permitted about 114,000 homes during the eight-year period ending in 2019, leading to a net increase of 99,000 homes during that time. Planning offers no convincing rationale for why they expect housing production to nearly triple without significant policy or zoning changes.

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I strongly oppose Planning's "status quo" approach to the housing element update, which would do little to meaningfully address unaffordable housing costs, lengthy commutes, poor air quality, displacement of lower-income renters, and segregated neighborhoods. Fortunately, with eight months remaining until housing element updates are due, there is still time to change course and create an equitable, transformative housing element. I urge you to instruct the Department of City Planning to take this important step for Los Angeles' future.

Personally sent by Elias Platte-Bermeo using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Elias Platte-Bermeo  
4215 Duquesne Ave Culver City, CA 90232-2807  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Mon, Feb 1, 2021 at 9:35 AM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

---

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Daniel Poineau [REDACTED]  
Reply-To [REDACTED]  
To: vince.bertoni@lacity.org

Wed, Feb 3, 2021 at 11:32 AM

Dear Director of City Planning Vince Bertoni,

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Personally sent by Daniel Poineau using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Daniel Poineau  
939 S Hill St Apt 635 Los Angeles, CA 90015-3283  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Feb 4, 2021 at 1:59 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,

The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

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**Case Numbers: CPC-2020-1365-GPA; ENV-2020-6762-EIR**

2 messages

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**Mary Proteau** <[REDACTED]>  
Reply-To: Mary Proteau <[REDACTED]>  
To: "housingelement@lacity.org" <housingelement@lacity.org>

Mon, Feb 15, 2021 at 1:32 PM

Dear Ms. Harding:

I strongly urge the City to include the environmental impact of street trees removed in the process of development in the EIR for the above-reference projects. The removal of trees is tracked by UFD and the BPW must be considered in any EIR regarding urban development. The requests for removal of street trees is being compiled by Angelenos for Trees and will be available by the time the EIR is in progress.

The importance of a healthy, sustainable tree canopy in the city of Los Angeles cannot be over-estimated. As stated a article published by the UN's Food and Agricultural Organization, "A city with well-planned and well-managed green infrastructure becomes more resilient, sustainable and equitable in terms of nutrition and food security, poverty alleviation, livelihood improvement, climate change mitigation and adaptation, disaster risk reduction and ecosystems conservation. Throughout their lifetime, trees can thus provide a benefit package worth two to three times more than the investment made in planting and caring for them."

LA's already insufficient tree canopy deserves immediate attention and thoughtful action. Trees take time to grow and flourish; there is no time to waste---and certainly no time to disregard, or diminish, the importance of acting *now* to protect this city from the negative effects that we are all aware are already impacting this city.

Thank you.

Mary Proteau  
147 1/2 So. Sycamore Avenue  
LA 90036  
323.934.7058

*"The sea, the great unifier, is man's only hope. Now...the old phrase has a literal meaning: we are all in the same boat."*

*—Jacques Yves Cousteau*

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**Housing Element** <housingelement@lacity.org>  
To: Mary Proteau <[REDACTED]>

Tue, Feb 16, 2021 at 10:41 AM

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team  
[Quoted text hidden]





Housing Element &lt;housingelement@lacity.org&gt;

---

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

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**Gregory Ramos** [REDACTED]

Sun, Feb 14, 2021 at 7:29 PM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Gregory Ramos using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Gregory Ramos  
557 W Virginia Ann Dr Azusa, CA 91702-1841  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Tue, Feb 16, 2021 at 10:37 AM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element <housingelement@lacity.org>

## THE FUTURE OF WEST LA

2 messages

**Stephen Randal**   
To: housingelement@lacity.org

Tue, Jan 26, 2021 at 6:56 PM

### TO WHOM IT MAY CONCERN:

I would like to share my thoughts as you requested regarding a misguided movement to betray the agreement the Westside had with the city (the TOC program) and replace it with a developer-backed, Abundant Housing LA-driven, unrealistic, unnecessary and potentially dangerous plan that would ruin some of LA's most charming, historic neighborhoods, fail to factor in what other cities that have weathered pandemics put in place for protection and create unbearable stress on the local infrastructure – for no gain whatsoever.

My thoughts come in two sections. The first section regards density on the Westside in general and the second is specifically about Century Glen.

As you know, Century City has been, is currently and will continue to add high rises (mostly condos) to Century City proper, adding significant densification. Thanks to Zev Yarovslovky and others, Century City exists cohesively with the surrounding area, even as it grows. It has remained contained. That's been good for all involved. However, there are warning signs of danger.

1. No one saw the pandemic coming. No one knew the huge impact it would have and most importantly, no one knows what the fallout of this pandemic will be in the years to come. We see gigantic changes already as people in large numbers work remotely. Few people believe that we will ever return to everyone working a 9-to-5 office routine. People are moving to less dense areas—real estate in Palm Springs has skyrocketed due to LA refugees. That's good. It will cut down on traffic (good not only for traffic but more importantly for the environment). But what will become of the empty office space? What is the future for the Century City Mall and local retail in general? Are we considering densifying a future ghost town? Are we inadvertently creating a new Detroit? Don't we need to have a clearer view of the future?
2. I'd like to share what I learned in the two months I worked on a SARS research project nearly two decades ago. Right now, we know nothing. Science moves slowly. You've watched how we have learned something important every week about Covid. That will continue. Rest assured density IS a factor. Right now, over-eager urban planners will tell you that overcrowding is the culprit, density is not. You won't hear such optimistic proclamations from epidemiologists, who really understand how disease is transmitted. First, density is simply a milder form of overcrowding. The disease will be more intense in an overcrowded area. But it will also (and even logic tells you this) be virulent in a normally dense area, with many people on the sidewalk, offices and residential hallways, elevators, parking structures, etc. Then there's the danger of public transit—a germaphobe's nightmare. New York's early bad luck in an indicator of the downside of density. In Hong Kong, on the study I was involved in, epidemiologists recognized this. Unable to turn back the clock and make Hong Kong less dense, they opted for a huge draconian public health effort that cost millions. When a virus strikes, there is a mega-bureaucracy to deal with it. And they deal with it in a heavy-handed way. If Angelenos balk at wearing masks, what will they think if they are forcibly required to REALLY quarantine? Will they like soldiers in the street? (Do you want to recreate what's happening in Copenhagen right now?) If you increase density, you have to add a health bureaucracy – otherwise you are sentencing people to death.
3. Always listen to epidemiologists before you listen to urban planners. Epidemiology is a science. Urban planning is not.
4. What have we learned over the past year or two? We don't have enough water for the people already here when there's a drought. We don't have enough electricity when there's a heatwave. We have too few police and firefighters. Classrooms at Westwood Charter and University High School are overcrowded. Our streets are narrow. Public transit (even post-Purple line) is inadequate. This area would suffer greatly from too much density. Right now, our infrastructure lags behind current growth. New growth would be a nightmare.
5. I'm a third-generation Angeleno. My life is not unlike my father's life when he was young. You drove a car where you wanted to go or rode a bus. Technology has changed everything. Changes are happening at warp speed. We don't know what the future of transportation will be. We do know that fewer and fewer people use public transit every year. That will most likely continue in a world of Uber, Lyft, self-driving cars, working from home, etc. We've

watched malls die, restaurants declare bankruptcy and retail disappear while Amazon surges. Never before have we faced such an uncertain future, yet we're thinking of destroying perfectly good neighborhoods as if our current lives are set in stone. They're not.

6. At its core, this move to add more multi-unit is anti-family. Parents want a good healthy lifestyle for their kids. Of course, many choose condos and apartments, but many do not. They should not be punished for seeking a long-accepted lifestyle that represents the American dream. There is no crime in having a backyard. In fact, judging the number of butterflies and birds in mine, it's an ecological oasis.
7. We have much underutilized commercial property in the area, especially along Santa Monica and Pico boulevards. Some mixed-use housing has been developed and remains largely vacant. Why so many vacancies? Price. Building in a desirable location created more unaffordable housing which does nothing to solve the biggest problem we face: lack of affordable housing. Don't ruin existing family neighborhoods when you can target our underutilized commercial areas and turn them into affordable housing, not luxury housing. This requires intensive government involvement, not upzoning and allowing rapacious developers to have their way.

At the risk of going on too long, I would like to add some thoughts about Century Glen specifically and the attempt to expand it to suit turning Century City into an urban destination, thus altering zoning to all or parts of Century Glen. All my previous observations apply to Century Glen as well.

1. Century Glen is already a multifamily area – hundreds of duplexes, apartments and condos mixed with single-family residences. It works, but that's because it was smartly planned and has been extremely careful about smart growth, not uncontrolled growth. Destroying a charming traditional family neighborhood that already meets the qualifications for our new era is criminal, especially when the need has not been established and, given changing times, might not even exist.
2. There is a bullying aspect to upzoning Century Glen. Century City can't utilize land to the north – that belongs to the Los Angeles Country Club. It can't go south because of the Hillcrest Country Club and Rancho Park Golf Course. It can't go east because Beverly Hills actually cares about its residents and will fight tooth and nail to protect them. Of course, there's the soon to be abandoned Fox lot, but that never seems to be mentioned (why is that?). It's much easier for LA City Planners to attack the weakest area – a modest family neighborhood that can't put up the resistance LA faces in the other directions. This is the sneakiest, most unfair form of upzoning. If a corporation did it, we would exorcise them. But municipal governments can get away with murder cloaked with supposedly good intentions.
3. Previous attempts to turn Century City into a nightlife center have already failed. Where is the Shubert? The Plitt theaters? The Playboy Club? Various failed nightclubs on the corner of Constellation and Avenue of the Stars. The Annenberg Photography Museum? Nightlife has never worked in Century City. The mall has one or two restaurants that draw a rowdy crowd and that has already resulted in much violent crime including one murder.
4. For many of us, Century Glen has been our home for decades (37 years in my case). Newcomers push strollers up and down the sidewalk and take advantage of the charms of the neighborhood. Improvements are constant, with remodeled and new homes. How grotesquely unfair to take the neighborhood they chose above all others, invested in, improved, and change the ground rules, turning that neighborhood into something drastically different. It's a bait and switch technique that only a bully would attempt.

Thank you very much for reading this lengthy letter. I hope you do the right thing.

**Stephen Randall**

1912 Comstock Ave.

Los Angeles, CA 90025

Home: 310-556-2741/Mobile: 310-387-6341

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**Housing Element** <housingelement@lacity.org>

To: Stephen Randal [REDACTED]

Thu, Jan 28, 2021 at 4:55 PM

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Marlene Rapkin [REDACTED]

Sat, Feb 13, 2021 at 10:23 AM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Marlene Rapkin using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Marlene Rapkin

114 Channel Pointe Mall Marina Del Rey, CA 90292-7272  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Tue, Feb 16, 2021 at 10:32 AM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Prabhu Reddy [REDACTED]

Mon, Jan 25, 2021 at 3:42 PM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Prabhu Reddy using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Prabhu Reddy  
3731 W 227th St Torrance, CA 90505-2524  
[REDACTED]



**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:49 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element <housingelement@lacity.org>

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## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

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Christopher Rhie [REDACTED] >

Sat, Feb 6, 2021 at 6:58 PM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Christopher Rhie using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Christopher Rhie  
829 S Serrano Ave Los Angeles, CA 90005-2749  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Mon, Feb 8, 2021 at 11:37 AM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,

The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Jacob Roberts [REDACTED]

Mon, Feb 15, 2021 at 3:09 PM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

It is disappointing that Planning does not intend to pursue the equitable distribution approach in the housing element update. Planning recently released an Initial Study for the housing element update which contains numerous inadequacies that merit serious concern. Planning's analysis suggests that the City can achieve over 80% of its RHNA target with no significant zoning or policy changes, and that the remaining 20% can be accommodated via already-in-progress community plan updates and changes to the City's Density Bonus program.

The facts do not support these conclusions, and that Planning's "status quo" proposal is flawed for the following reasons:

Planning's "status quo" proposal fails to affirmatively further fair housing, which is required under state law. By planning for most housing growth on parcels where multifamily development is already allowed, the City is steering housing opportunities away from the 75% of the City's residentially-zoned land that is restricted to single-family housing only. This perpetuates historic patterns of segregation and exclusion, and continues to push housing opportunities for lower-income households towards lower-income neighborhoods.

Planning anticipates that under current zoning, Los Angeles can expect to build 307,000 more homes between 2022 and 2029. However, Los Angeles only permitted about 114,000 homes during the eight-year period ending in 2019, leading to a net increase of 99,000 homes during that time. Planning offers no convincing rationale for why they expect housing production to nearly triple without significant policy or zoning changes.

Planning's anticipated site inventory, where they expect the development of 307,000 more homes to occur, likely contains a large number of parcels zoned for multifamily residential development. This suggests that a large number of existing rent-stabilized housing units would be redeveloped under Planning's "status quo" approach, increasing lower-income renter households' risk of displacement.

Planning anticipates accommodating 93,000 homes primarily through a series of community plan updates that are already in progress. However, many draft community plan updates highlighted in the Initial Study, including updates for the Westside, Hollywood, Southwest Valley, Southeast Valley, and Purple Line Transit Neighborhood Plan, are unambitious and do little to create significant amounts of new housing capacity. This approach also allows high-resource neighborhoods whose community plan update processes have not yet started, like Brentwood-Pacific Palisades and Westwood, to avoid zoning reforms that are necessary to accommodate the City's RHNA goal. This is unfair.

I strongly oppose Planning's "status quo" approach to the housing element update, which would do little to meaningfully address unaffordable housing costs, lengthy commutes, poor air quality, displacement of lower-income renters, and segregated neighborhoods. Fortunately, with eight months remaining until housing element updates are due, there is still time to change course and create an equitable, transformative housing element. I urge you to instruct the Department of City Planning to take this important step for Los Angeles' future.

Personally sent by Jacob Roberts using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Jacob Roberts

4250 Coldwater Canyon Ave Studio City, CA 91604-1950  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Tue, Feb 16, 2021 at 10:46 AM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Dario Rodman-Alvarez &lt;[REDACTED]&gt;

Mon, Feb 1, 2021 at 6:38 PM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Personally sent by Dario Rodman-Alvarez using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Dario Rodman-Alvarez  
225 E 16th St Los Angeles, CA 90015-3615  
[REDACTED]

**Housing Element** <housingelement@lacity.org>  
To: Dario Alvarez [REDACTED]

Wed, Feb 3, 2021 at 9:32 AM

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team  
[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Marcos Rodriguez Maciel &lt;[REDACTED]&gt;

Wed, Jan 27, 2021 at 5:56 AM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Personally sent by Marcos Rodriguez Maciel using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Marcos Rodriguez Maciel

7560 Hollywood Blvd Apt 301 Los Angeles, CA 90046-2851



**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:56 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element <housingelement@lacity.org>

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## Comments on Proposed Scope of EIR for Housing Element 2021-2029 Update

2 messages

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**Catherine R** [REDACTED]  
To: housingelement@lacity.org

Tue, Feb 16, 2021 at 3:53 PM

City of Los Angeles, Department of City Planning  
ATTN: Cally Hardy, City Planning Associate  
Case Numbers: CPC-2020-1365-GPA; ENV-2020-6762-EIR  
[200 N. Spring Street, Room 750, Los Angeles, CA 90012](#)

Please ensure that the Draft EIR which will be prepared for the Housing Element 2021-2029 Update addresses the impact of added housing on existing trees. We need new housing in Los Angeles but we also need to protect and retain our tree canopy. If not done thoughtfully, new construction often needlessly results in removal of existing trees. Trees absorb greenhouse gases and provide shade to lessen the urban heat island effect. Removal of trees has a negative effect on the environment and on climate resiliency therefore the EIR must consider this issue.

Catherine Ronan  
Mar Vista Arbor Group  
[3439 Wade Street](#)  
[Los Angeles, CA 90066](#)  
818-917-9831

---

**Housing Element** <housingelement@lacity.org>  
To: Catherine R [REDACTED]

Tue, Feb 16, 2021 at 4:30 PM

Thank you for your email. Your comment was submitted after the deadline for comments; the comment is marked late, but has been received and will be included in the environmental case file.

Regards,  
The Housing Element Team  
[Quoted text hidden]



Housing Element <housingelement@lacity.org>

## Fwd: Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

**Flora Melendez** <flora.melendez@lacity.org>  
To: Housing Element <housingelement@lacity.org>

Mon, Jan 25, 2021 at 1:03 PM

Hello.

I'm forwarding an email received by Vince.

Thank you.

~ Angie



**Flora (Angie) Melendez**  
Pronouns: she/hers/her  
Executive Administrative Assistant  
**Los Angeles City Planning**  
200 N. Spring St., Suite 525C  
Los Angeles, CA 90012  
Planning4LA.org  
T: (213) 978-1271 | F: (213) 978-1275  
E: flora.melendez@lacity.org



----- Forwarded message -----

From: **Melanie Rosenberg** [REDACTED]  
Date: Mon, Jan 25, 2021 at 1:02 PM  
Subject: Housing Element Environmental Impact Report - Opposition to Status Quo Plan  
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

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Personally sent by Melanie Rosenberg using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Melanie Rosenberg  
[2160 S Beverly Glen Blvd Apt 357 Los Angeles, CA 90025-6037](mailto:2160S@abundanthousingla.org)

---

**Housing Element** <housingelement@lacity.org>  
To [REDACTED]

Thu, Jan 28, 2021 at 4:41 PM

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Abundant Housing's false statements about upzoning is "needed" to accommodate population growth

3 messages

Jay Ross

Wed, Jan 27, 2021 at 9:10 AM

To: Los Angeles City Planning &lt;housingelement@lacity.org&gt;

Hi Planning Dept.,

Abundant Housing is falsely claiming that upzoning is needed to accommodate L.A.'s growth, and existing housing shortage.

The General Plan from 1990 (or whatever the most recent year) has an exhibit that shows that the city's zoning capacity is nearly 9,000,000.

And that does not including apartments that can be built in C zones, density bonus and TOC incentives, and ADUs.

So, please ignore their false claims, and do your zoning capacity calculations to include all of the above.

My calculations for the West LA Community Plan Area show that there is a capacity currently of 150,000 units, for a population of 90,000.

I used data in the current WLA Community Plan.

West LA already has sufficient zoning for any huge population growth.

Below is where Abundant Housing falsely claims that upzoning is needed.

### Abundant Housing L.A.

[JosrfaafnuotegSsuaruy 25apo aSntm s1aco0:rfe1s5h uAsMdh](#) ·

The LA Department of City Planning released a preview of our city's Housing Element update, which explains how Los Angeles will accommodate 450,000 more homes by 2029. Unfortunately, Planning's approach is a plan for failure.

Planning believes that the City can achieve over 80% of LA's housing growth target with no significant zoning or policy changes, and that the remaining 20% can be accommodated through several weak community plan updates. The facts don't support this approach, and going down this path would mean failing to build enough housing, particularly in the high-income areas that use exclusionary zoning to keep new people out. It's a NIMBY's dream come true.

It's time to speak out. The Equitable Distribution approach to the Housing Element is the right way to plan for LA's future. Please send this letter to Planning and City Hall to convince them to change course.

<https://secure.everyaction.com/ngmpRnpBI0CeMmU913I7lg2>

Also, Planning is having Zoom public hearings on the housing element initial study on Tue 1/26 at 5:15pm, and Thu 1/28 at 11:15am.

This is a great opportunity to make your voice heard on the flaws of Planning's housing element approach. Here is the webinar link and login IDs:

Tuesday - 733-042-203 (English) | 248-966-475 (Spanish)

Thursday - 715-621-491 (English) | 679-132-603 (Spanish)

Jay Ross [REDACTED]

Wed, Jan 27, 2021 at 9:11 AM

To: Los Angeles City Planning <housingelement@lacity.org>, "housing.element@lacity.org" <housing.element@lacity.org>

Hi Planning Dept.,

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Housing Element <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:56 PM

To: Jay Ross [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

On Wed, Jan 27, 2021 at 9:11 AM Jay Ross [REDACTED] wrote:  
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Housing Element <housingelement@lacity.org>

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## EIR: Environmental impact of the removal of trees

2 messages

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Jay Ross [REDACTED] >  
To: "housingelement@lacity.org" <housingelement@lacity.org>

Tue, Feb 16, 2021 at 10:28 AM

To City,

I request that **the environmental impact of the removal of trees for development be examined in the EIR.**

Tree removal information for development is tracked by UFD and BPW and must be considered in any EIR.

When open space and setbacks are reduced for upzoning and higher density, tree canopy decreases.

Many small apartments and houses with big green yards are demolished, and replaced with apartments with 90% lot coverage of concrete (and small trees in pots and planters that barely grow).

Thank you,

Jay Ross  
West LA 90064

---

Housing Element <housingelement@lacity.org>  
To: Jay Ross [REDACTED]

Tue, Feb 16, 2021 at 11:08 AM

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team  
[Quoted text hidden]





Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Ryan Rubin [REDACTED] &gt;

Sun, Feb 14, 2021 at 11:07 AM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Ryan Rubin using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Ryan Rubin  
11962 Culver Dr Culver City, CA 90230-6002  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Tue, Feb 16, 2021 at 10:36 AM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

---

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

**Randolph Ruiz** [REDACTED]

Thu, Jan 28, 2021 at 8:38 PM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

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Personally sent by Randolph Ruiz using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Randolph Ruiz  
2222 10th St Santa Monica, CA 90405-1308  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Mon, Feb 1, 2021 at 9:34 AM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Tieira Ryder [REDACTED]

Sat, Feb 13, 2021 at 4:16 PM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

<https://htwws.org/santamonicaairport/> (Close the airport, that space runs into Mar Vista)

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Personally sent by Tieira Ryder using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Tieira Ryder

2/16/2021

City of Los Angeles Mail - Housing Element Environmental Impact Report - Opposition to Status Quo Plan

3826 Grand View Blvd Unit 661385 Los Angeles, CA 90066-8265

[REDACTED]

---

**Housing Element** <housingelement@lacity.org>

Tue, Feb 16, 2021 at 10:33 AM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Rafael Sands [REDACTED]

Sat, Feb 13, 2021 at 10:00 AM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

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Personally sent by Rafael Sands using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Rafael Sands  
12721 Hanover St Los Angeles, CA 90049-3739  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Tue, Feb 16, 2021 at 10:32 AM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]





Housing Element <housingelement@lacity.org>

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## CPC-2020-1365-GPA ENV 2020 6762 EIR

2 messages

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**Jesse Sanford** <[REDACTED]>  
To: Cally.Hardy@lacity.org, housingelement@lacity.org

Tue, Feb 16, 2021 at 4:08 PM

Dear Ms. Hardy,

Hope you are well.

I am requesting that the removal of trees, and more specifically, the environmental impact of such an action, be examined in the EIR. Tree removal information for development is tracked by the Urban Forestry Division, Bureau of Street Services and non-governmental organizations, like Angelenos for Trees, has compiled data regarding City tree removal requests, which can be accessed upon request.

At the scoping meeting last month, I was disappointed to learn that existing trees and tree canopy were not included in the list of topics to be analyzed in the EIR. It is difficult to imagine how the City of Los Angeles will be able to meet, as well as exceed, the goals set out in the Mayor's Green New Deal if existing tree canopy is not protected and preserved. Furthermore, developers' promise of introducing young plantings at a higher ratio than existing trees is an empty one, as it does not take into account the decades it will take until the new plantings produce the same benefits as existing trees or ensure protection and survival of these trees.

I urge you to re-consider and act to include such an important topic, like the one described above, in the EIR. Thank you.

Sincerely,  
Jesse Sanford

---

**Housing Element** <housingelement@lacity.org>  
To: Jesse Sanford <[REDACTED]>  
Cc: Cally Hardy <Cally.Hardy@lacity.org>

Tue, Feb 16, 2021 at 4:31 PM

Thank you for your email. Your comment was submitted after the deadline for comments; the comment is marked late, but has been received and will be included in the environmental case file.

Regards,  
The Housing Element Team  
[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

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## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

**Noah Schechter** [REDACTED]

Mon, Feb 15, 2021 at 1:47 PM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Noah Schechter using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Noah Schechter

6635 De Longpre Ave Los Angeles, CA 90028-7851  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Tue, Feb 16, 2021 at 10:42 AM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]

**Housing Element** <housingelement@lacity.org>

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## Further expansion of apartments in WLA

2 messages

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**Hans Schieder** [REDACTED] >  
Reply-To: Hans Schieder <[REDACTED]>  
To: "HousingElement@LAcity.org" <HousingElement@lacity.org>

Sun, Feb 7, 2021 at 8:59 PM

Gentlemen:

I will be brief. I also hope to be perfectly clear.

Your program intends to provide more housing in Los Angeles. Fine. However we, and I speak for many fellow residents in West Los Angeles and Palms, are very concerned with the current state of affairs regarding zoning in our area.

We have seen huge apartment buildings erected in areas previously restricted to three and four stories. Those monstrosities are both eyesores and an inexcusable gift to greedy developers. I attended a crowded meeting regarding the Casden project and everyone there spoke against it! Who the hell authorized it? Are you people too stupid to understand the meaning of the word, "NO!"?

We have enjoyed a safe and pleasant area in which to live and bring up our children. Because of the people who have changed our zoning metrics we now are subject to more and constant traffic, more crime as more cars line the streets, less available resources for everyone and a reduction in air quality. We also are experiencing something just as serious but more difficult to quantify, and that is a real reduction in personal space!

The need for more housing could be easily reduced if the idiots running this state were to stop importing illegals into it! The reduction in the need for more housing would be joined by the reduction in the need to build more roads to accommodate the additional cars they bring into the city.

This entire attempt at expansion needs to end right now! We don't have the water, the electrical power or the roads to accept more people and we are livid at the effrontery of you public officials who are trying to dictate to us, the owners of property in our area how we should live!

As I said at the outset, if you want to build more housing, fine. Just do it somewhere other than in areas that are long established and populated by people who are content with things as they are. We don't want to live in New York!

In other words, LEAVE WLA ALONE!!

Sincerely,

Hans Schieder

---

**Housing Element** <housingelement@lacity.org>  
To: Hans Schieder [REDACTED]

Mon, Feb 8, 2021 at 11:36 AM

Thank you for your email. Your comments and/or attachments have been received and filed.

2/16/2021

City of Los Angeles Mail - Further expansion of apartments in WLA

Regards,  
The Housing Element Team  
[Quoted text hidden]



Housing Element <housingelement@lacity.org>

---

## The Environmental Impact of Tree Removal

2 messages

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**Robert Schlesinger** [REDACTED]  
To: housingelement@lacity.org

Mon, Feb 15, 2021 at 4:10 PM

To the City of Los Angeles, Department of City Planning:

Attn: Calls Hardy, City Planning Associate.

Re; Case Numbers: CPC-2020-1365-GPA, ENV-2020-6762-EIR.

200 N SPRING ST  
Rm 750  
Los Angeles, CA 90210  
Ph: 213.978.1643.

The environmental impact of the removal of trees for development be examined in the EIR. Tree removal information for development is tracked by UFD and BPW and must be considered in any EIR. Data from City tree removal requests is being compiled by Angelenos for Trees and will be available by the time their EIR is in progress. Trees have cumulative environmental significance, and tree planting is not a mitigation.

Robert Schlesinger,

Benedict Canyon Association  
310.553.4222

Bel Air-Beverly Crest Neighborhood Council  
Planning & Land Use Committee  
310.479.6247 #2

---

**Housing Element** <housingelement@lacity.org>  
To: Robert Schlesinger [REDACTED]

Tue, Feb 16, 2021 at 10:51 AM

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

2/16/2021

City of Los Angeles Mail - The Environmental Impact of Tree Removal

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

**Brent W Scott** <[REDACTED]>

Sun, Feb 14, 2021 at 12:54 PM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Brent W Scott using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Brent W Scott  
3940 Grand View Blvd Apt 258 Los Angeles, CA 90066-4571  
[REDACTED]



**Housing Element** <housingelement@lacity.org>

Tue, Feb 16, 2021 at 10:36 AM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]

Chat

Most of the data is from the ACS, but some are from other sources as cited. If you would like to see more of this data it's available in the vision digital workshop available here: <https://storymaps.arcgis.com/stories/feba270080e94f248f8c1624a0c7c806>

Vivian M. Escalante to Everyone

7:34 PM

Thank you.

Rampart Village Neighborhood Council to Everyone

7:35 PM

This report asserts that the RHNA numbers are based on incorrect data: PlanningReport.com <https://www.planningreport.com/2020/09/23/ca-s-housing-needs-assessment-used-incorrect-data-masks-californias-failure-build>

In CD13, the median household income is \$24,074: [https://en.wikipedia.org/wiki/Los\\_Angeles\\_City\\_Council\\_District\\_13](https://en.wikipedia.org/wiki/Los_Angeles_City_Council_District_13)

Romana Barajas to Everyone

7:37 PM

They say the medium income for LA is \$70,000+ but that is the truth for a few. The hourly rate was recently increased to \$15 which equals \$32,900 gross a year. so how can \$70,000 be the guide line for this?

Rampart Village Neighborhood Council to Everyone

7:37 PM

RSO units are being decimated by the Ellis Act

Rampart Village Neighborhood Council to Everyone

7:38 PM

Romana, I WISH I made 70k per year! lol

Romana Barajas to Everyone

7:39 PM

Chat

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Romana Barajas to Everyone

7:39 PM

Yeah. So do I. I think I have a good job and don't make that!!!

Vivian M. Escalante to Everyone

7:42 PM

Does "Moderate" equal the "Missing Middle"?

Rampart Village Neighborhood Council to Everyone

7:42 PM

Not meeting the low end is a failure of leadership the Mayor's office and City Council

affordable housing, and potential Southern California disasters. You say you are fighting a battle. But many times it really looks like you are fighting us. The whole city is at your disposal, try to fan out these TOC's and push them in more affluent areas if you are sincere about that battle.

This is not a NIMBY thing, it's a "Is this the only Back Yard you can build on?" In the end, there is no enforcement of Zoning Declarations and there is in fact direct displacement. So that is what this means. Most of the area in NELA is terminations. Most of the time there is no Community net loss when across the street seniors are kicked over declares it a future TOC.

ays to address this issue, let's hope City Planning and finds a new way to address affordable housing. Well if you target Northeast LA for upzoning. be challenged if they are used to underwrite City y corrupt way to go about it. Whatever deficit you re than anticipated right now.

Chat

also what the city supposedly paid for tiny homes. That was ridiculous also

Rampart Village Neighborhood Council to Everyone 8:14 PM

Agreed Richard

Me to Everyone 8:14 PM

The Tiers function as newly created zones, which were not adopted by ordinance nor approved by the voters. Only the voters can amend Measure JJJ; the Council may only make non-substantive amendments to the measure's provisions. The TOC Guidelines significantly rewrite Section 6 of Measure JJJ in numerous ways.

Vivian M. Escalante to Everyone 8:15 PM

I need to sign off, but I am interested in First Time Ownership, and STOP the high density in Los Angeles, and begin to create new communities, which will create jobs OUTSIDE OF LOS ANGELES.

Carrie Sutkin to Everyone 8:16 PM

ok. thanks. Join us for Housing Sat. Feb. 20th at 10 am

To: Everyone

Type message here...

File



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Gabrielle Seiwert [REDACTED]

Mon, Jan 25, 2021 at 1:08 PM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Gabrielle Seiwert using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Gabrielle Seiwert  
3436 Madera Ave Apt 1 Los Angeles, CA 90039-1957  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:43 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

**Gabrielle Seiwert** [REDACTED]

Tue, Feb 16, 2021 at 10:38 AM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

It is disappointing that Planning does not intend to pursue the equitable distribution approach in the housing element update. Planning recently released an Initial Study for the housing element update which contains numerous inadequacies that merit serious concern. Planning's analysis suggests that the City can achieve over 80% of its RHNA target with no significant zoning or policy changes, and that the remaining 20% can be accommodated via already-in-progress community plan updates and changes to the City's Density Bonus program.

The facts do not support these conclusions, and that Planning's "status quo" proposal is flawed for the following reasons:

Planning's "status quo" proposal fails to affirmatively further fair housing, which is required under state law. By planning for most housing growth on parcels where multifamily development is already allowed, the City is steering housing opportunities away from the 75% of the City's residentially-zoned land that is restricted to single-family housing only. This perpetuates historic patterns of segregation and exclusion, and continues to push housing opportunities for lower-income households towards lower-income neighborhoods.

Planning anticipates that under current zoning, Los Angeles can expect to build 307,000 more homes between 2022 and 2029. However, Los Angeles only permitted about 114,000 homes during the eight-year period ending in 2019, leading to a net increase of 99,000 homes during that time. Planning offers no convincing rationale for why they expect housing production to nearly triple without significant policy or zoning changes.

Planning's anticipated site inventory, where they expect the development of 307,000 more homes to occur, likely contains a large number of parcels zoned for multifamily residential development. This suggests that a large number of existing rent-stabilized housing units would be redeveloped under Planning's "status quo" approach, increasing lower-income renter households' risk of displacement.

Planning anticipates accommodating 93,000 homes primarily through a series of community plan updates that are already in progress. However, many draft community plan updates highlighted in the Initial Study, including updates for the Westside, Hollywood, Southwest Valley, Southeast Valley, and Purple Line Transit Neighborhood Plan, are unambitious and do little to create significant amounts of new housing capacity. This approach also allows high-resource neighborhoods whose community plan update processes have not yet started, like Brentwood-Pacific Palisades and Westwood, to avoid zoning reforms that are necessary to accommodate the City's RHNA goal. This is unfair.

I strongly oppose Planning's "status quo" approach to the housing element update, which would do little to meaningfully address unaffordable housing costs, lengthy commutes, poor air quality, displacement of lower-income renters, and segregated neighborhoods. Fortunately, with eight months remaining until housing element updates are due, there is still time to change course and create an equitable, transformative housing element. I urge you to instruct the Department of City Planning to take this important step for Los Angeles' future.

Personally sent by Gabrielle Seiwert using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Gabrielle Seiwert  
3436 Madera Ave Apt 1 Los Angeles, CA 90039-1957  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Tue, Feb 16, 2021 at 11:08 AM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]





Housing Element &lt;housingelement@lacity.org&gt;

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## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

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**Andrew Selvo** <[REDACTED]>

Mon, Jan 25, 2021 at 1:13 PM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Personally sent by Andrew Selvo using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Andrew Selvo  
3021 Kelton Ave Los Angeles, CA 90034-3021  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:44 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Maansi Shah &lt;[REDACTED]&gt;

Sun, Jan 31, 2021 at 8:57 PM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Personally sent by Maansi Shah using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Maansi Shah  
40221 Tesoro Ln Palmdale, CA 93551-4833  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Mon, Feb 1, 2021 at 9:35 AM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element <housingelement@lacity.org>

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## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

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Aditi Shakkarwar [REDACTED]

Tue, Feb 16, 2021 at 3:18 PM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Personally sent by Aditi Shakkarwar using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Aditi Shakkarwar  
6013 Carlton Way Apt 7 Los Angeles, CA 90028-6529  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Tue, Feb 16, 2021 at 4:28 PM

To [REDACTED]

Thank you for your email. Your comment was submitted after the deadline for comments; the comment is marked late, but has been received and will be included in the environmental case file.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element <housingelement@lacity.org>

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## need for housing

2 messages

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**Bruce Schelden** [REDACTED]  
Reply-To: Bruce Schelden <[REDACTED]>  
To: "housingelement@lacity.org" <housingelement@lacity.org>

Sun, Jan 31, 2021 at 1:26 PM

I do not believe we need more housing in the city. Adding more means more people, in an area which is already dense and needs to import practically all of it's water. If you don't build people will not come here which is better for all who are already here.

---

**Housing Element** <housingelement@lacity.org>  
To: Bruce Schelden <[REDACTED]>

Mon, Feb 1, 2021 at 9:35 AM

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Jesse Silva &lt;[REDACTED]&gt;

Sun, Jan 31, 2021 at 7:55 PM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Jesse Silva using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Jesse Silva  
5500 Ridge Oak Dr Los Angeles, CA 90068-2553  
[REDACTED]



**Housing Element** <housingelement@lacity.org>

Mon, Feb 1, 2021 at 9:35 AM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

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## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

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**Andrew Silver** <[REDACTED]>

Wed, Feb 3, 2021 at 9:42 AM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

I am asking you to be Bold and work with City Planning to make real change to address the critical housing shortage that is the root cause of our homelessness crisis. We need to plan now for the Los Angeles of 2050.

It is disappointing that Planning does not intend to pursue the equitable distribution approach in the housing element update. Planning recently released an Initial Study for the housing element update which contains numerous inadequacies that merit serious concern. Planning's analysis suggests that the City can achieve over 80% of its RHNA target with no significant zoning or policy changes, and that the remaining 20% can be accommodated via already-in-progress community plan updates and changes to the City's Density Bonus program.

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Personally sent by Andrew Silver using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

2/16/2021

City of Los Angeles Mail - Housing Element Environmental Impact Report - Opposition to Status Quo Plan

Andrew Silver  
4328 Bellingham Ave Studio City, CA 91604-1605

[REDACTED]

---

**Housing Element** <housingelement@lacity.org>  
To: Andrew Silver <[REDACTED]>

Thu, Feb 4, 2021 at 1:56 PM

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team  
[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

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**the environmental impact of the removal of trees for development be examined in the EIR**

2 messages

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**Josh Silver** <[REDACTED]>  
To: housingelement@lacity.org

Mon, Feb 15, 2021 at 4:40 PM

Re: Housing Element 2021-2019 Update **which does not consider the effect of added housing on existing trees**, which are impacted both on properties and in the parkways (often removed for construction), in the topics of their Environmental Impact Report (EIR).

**The environmental impact of the removal of trees for development must be examined in the EIR.** Tree removal information for development is tracked by UFD and BPW and must be considered in any EIR. Data from City tree removal requests is being compiled by Angelenos for Trees and will be available by the time their EIR is in progress. Trees have cumulative environmental significance, and tree planting is not a mitigation. It's disgraceful that this subject is not being addressed.

Please amend the process so that the effect of adding additional housing on trees is examined, discussed and adopted into any planning process.

Thank you.

Regards,

JOSH SILVER  
President  
Fairburn Lencrest HOA  
[1833 Fairburn Ave, Los Angeles, CA 90025](https://www.fairburnlencrest.com)  
310-962-8130 - cell

Virus-free. [www.avast.com](http://www.avast.com)

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**Housing Element** <housingelement@lacity.org>  
To: Josh Silver <[REDACTED]>

Tue, Feb 16, 2021 at 10:52 AM

Thank you for your email. Your comments and/or attachments have been received and filed.

2/16/2021

City of Los Angeles Mail - the environmental impact of the removal of trees for development be examined in the EIR

Regards,  
The Housing Element Team  
[Quoted text hidden]



Housing Element <housingelement@lacity.org>

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## CPC-2020-1365-GPA; ENV-2020-6762-EIR 2

2 messages

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**Adele Slaughter** [REDACTED] >  
To: housingelement@lacity.org

Mon, Feb 15, 2021 at 11:45 AM

Dear Cally Hardy,

Please examine the environmental impact of the removal of trees for development in the EIR. Trees have cumulative environmental significance, and tree planting is not a mitigation.

I live in Studio City and just in the past year we have seen 90 mature growth trees maybe as old as 70 years felled at Sportsmen's Lodge and in the past few weeks 50 mature trees over 50 years old on CITY property near the Sunkist Building were destroyed. And that is only the tip of the destruction of our tree canopy in Los Angeles.

To claim the city can plant 2 trees for one is not a solution. These new trees will be in shock and won't grow right away, thus it will take decades for them to sequester carbon, clean the air, cool our neighborhoods at the rate those mature trees have been doing so.

I question the motives behind all of the destruction of mature growth trees in the Valley. When I studied city planning, I will never forget how the professor showed is that the Beltway in Washington DC was designed to keep the poor minorities away from the more affluent property owners.

What is the reasoning behind taking down so many majestic trees that cool the valley, clean our air, afford us some measure of beauty to replace it with developments that look like industrial parks? To help developers build more buildings which increase the heat, add to the carbon and over burden our infrastructure in order to line the pockets of developers? And we know that the developers rent out most of the new housing at market rate and only a small fraction are low cost housing.

So what are we selling out our majestic trees to gain? City Planning must find a way to be more thoughtful.

I am not against development, I am against bad development.

Developers can SAVE OUR TREES.  
City Planning must stand up to build preserve our open green spaces for the future of our health and wellbeing.

With respect,

Adele Slaughter  
4544 Ethel Ave  
Studio City, CA 91604

---

**Housing Element** <housingelement@lacity.org>  
To: Adele Slaughter [REDACTED]

Tue, Feb 16, 2021 at 10:38 AM

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team  
[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

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**Comments on Housing Element DEIR Case Numbers: CPC-2020-1365-GPA; ENV-2020-6762-EIR**

3 messages

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**Clara Solis** [REDACTED]  
To: housingelement@lacity.org

Mon, Feb 15, 2021 at 8:43 PM

City of Los Angeles, Department of City Planning

ATTN: Cally Hardy, City Planning Associate

Case Numbers: CPC-2020-1365-GPA; ENV-2020-6762-EIR

[200 N. Spring Street, Room 750, Los Angeles, CA 90012](#)

To Whom It May Concern:

Today was a City of Los Angeles Holiday. I believed that the deadline for submittals would be tomorrow. Please let me know if my comments will be accepted.

I had little time to prepare comments about this important document. However I did want to submit some comments on to housing policies that I feel have detrimentally impacted my community.

**Transit Oriented Communities – Density Bonuses:**

It may be the case that these bonuses were created with the best of intentions. Planners may have naively thought that density could be added and affordable or low income housing added while not increasing traffic and reducing reliance on vehicles. However, what has occurred in the City of Los Angeles is a perversion that has resulted in little low-income housing being built and the loss of housing for working class residents to greedy developers. Angelenos had a big heart and wanted to help house the homeless with measure JJJ. What our City Council came up with was policies and tweaks that have done little to solve our homeless crisis. I had little time to prepare this statement but which to bring forward these observations on problems with the TOC Density bonuses.

1. The sky rocketing amounts of cash that current landlords can receive for property has led property owners to sell rentals. This previously affordable housing stock is bought up by developers -many times out of state developers whose bottom line is building housing that will make them a fast buck. Often only a small percentage of the housing in TOC developments is given for low income housing, while the majority of the units are too expensive for the current residents to afford. The pricing of these units puts upward pressure on housing costs throughout the community.

2. These developments are supposedly transit oriented, but in reality the new residents of these projects have vehicles which they park in the surrounding neighborhoods. Because these projects are not being built in truly transit oriented communities with markets within walking distance, they are making residents in already dense neighborhoods fight for the little available parking in their community. Further many working class Angelenos work at jobs that are not close to transit. Additionally, the City's definitions of what qualifies for a TOC is not truly transit oriented. See below.
3. What Angelenos anticipated when the passed measure JJJ was that housing would be built next to transit like the Gold Line not near bus lines. Instead, what the City did with their policies is attempt to artificially inflate the areas that qualify for the TOC density bonuses. For example, the City in 2018 passed a measure to reduce DASH headways to 15 minute intervals so that more communities would qualify.
4. Often the communities that are most being impacted by TOC developments are environmental justice communities, because environmental justice communities more often use transit and are more likely to have transit stops in their communities. These communities end up suffering from more traffic and pollution from higher density. Their communities which were once livable and affordable are seeing trees removed and their communities become heat islands which they can no longer afford. It is often the case that these communities are already overburdened by freeways as well. The traffic in their communities won't be abated by community members increased reliance on transit. The traffic that travels and pollutes their community is from pass through traffic from other parts of the city.
5. The TOC program is biased against communities of color and more dense communities. It results in higher density in communities that are already dense and rewards communities that have low density and few transit lines with continuing low density. The TOC's seem intent on building greater density where there is already greater density and maintaining the status quo in lower density neighborhoods.
6. The City of Los Angeles should revoke CF 18-0244 which increases the DASH intervals to 15 minutes. Because of Covid 19, this frequency is not needed in most communities. Further, in most communities it never was implemented. The City of Los Angeles cannot afford this.
7. Rather than rewarding greedy developers with density bonuses that are making our communities unlivable and unaffordable, the city should go back to a system where housing is funded and built by the City funded by fees as was the cases when there was RDA money. It appears that the surge in homelessness has followed the demise of RDA's by Governor Brown.

### **Small Lot Projects:**

Small lot units are removing rent stabilized units and replacing them with market rate units for sale.

Small lot units are removing affordable housing and replacing it with housing that is unaffordable to current Los Angeles residents.

Small Lot units remove housing for seniors and replace it with homes that are not friendly to the disabled or elderly. Three and four story buildings are appearing throughout Los Angeles with kitchens on the second floor which make them inaccessible to the disabled and elderly. That housing for the elderly and disabled is being removed at such a fast pace to be replaced with market rate units is discriminatory.

### **GREEN SPACE and the ENVIRONMENT**

Are removing green space and tree canopy in Los Angeles. These projects are removing trees by the thousands throughout Los Angeles.

They are creating heat islands in our densest and poorest communities.

### **FAMILIES**

Many of the developments have little or no open space for families. Small Lot developments with fewer than 19 units have to provide minimal recreational area for children. Many of these Small Lot Developments have little space other than roof top decks and balconies which are not child friendly. The City must look at what these policies impacts will be on our families and their children.

Thank you,

**Clara Solis**



(She,her,ella)

323-422-6446

---

**Housing Element** <housingelement@lacity.org>

Tue, Feb 16, 2021 at 10:59 AM

To: Clara Solis [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]

---

**claramsolis@earthlink.net** [REDACTED]

Tue, Feb 16, 2021 at 10:59 AM

Reply-To [REDACTED]

To: Housing Element <housingelement@lacity.org>

I apologize for this automatic reply to your email.

To control spam, I now allow incoming messages only from senders I have approved beforehand.

If you would like to be added to my list of approved senders, please fill out the short request form (see link below). Once I approve you, I will receive your original message in my inbox. You do not need to resend your message. I apologize for this one-time inconvenience.

Click the link below to fill out the request:

<https://webmail.pas.earthlink.net/wam/addme?a=claramsolis@earthlink.net&id=11eb-7089-16cb13ba-857c-002128a3c968>



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Ji Son [REDACTED] >  
Reply-To [REDACTED]  
To: vince.bertoni@lacity.org

Thu, Feb 4, 2021 at 10:27 AM

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Planning anticipates that under current zoning, Los Angeles can expect to build 307,000 more homes between 2022 and 2029. However, Los Angeles only permitted about 114,000 homes during the eight-year period ending in 2019, leading to a net increase of 99,000 homes during that time. Planning offers no convincing rationale for why they expect housing production to nearly triple without significant policy or zoning changes.

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Personally sent by Ji Son using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Ji Son  
2724 Cincinnati St Los Angeles, CA 90033-3116  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Feb 4, 2021 at 2:03 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,

The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Edda Spielmann &lt;[REDACTED]&gt;

Mon, Jan 25, 2021 at 1:32 PM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Edda Spielmann using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Edda Spielmann  
2503 28th St Apt 4 Santa Monica, CA 90405-2970  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:45 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Gregory Sroka &lt;[REDACTED]&gt;

Mon, Jan 25, 2021 at 1:24 PM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

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Personally sent by Gregory Sroka using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Gregory Sroka  
11109 Emelita St North Hollywood, CA 91601-1308  
[REDACTED]

---

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:45 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Fwd: Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

**Flora Melendez** <flora.melendez@lacity.org>  
To: Housing Element <housingelement@lacity.org>

Mon, Jan 25, 2021 at 1:07 PM

Hello.

I'm forwarding an email received by Vince.

Thank you.

~ Angie

LOS ANGELES  
CITY PLANNING

**Flora (Angie) Melendez**  
Pronouns: she/hers/her  
Executive Administrative Assistant  
**Los Angeles City Planning**  
200 N. Spring St., Suite 525C  
Los Angeles, CA 90012  
Planning4LA.org  
T: (213) 978-1271 | F: (213) 978-1275  
E: flora.melendez@lacity.org



----- Forwarded message -----

From: **Ethan Stanislawski** [REDACTED]  
Date: Mon, Jan 25, 2021 at 1:05 PM  
Subject: Housing Element Environmental Impact Report - Opposition to Status Quo Plan  
To: <vince.bertoni@lacity.org>

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Personally sent by Ethan Stanislawski using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Ethan Stanislawski  
[1940 N Highland Ave Apt 29 Los Angeles, CA 90068-3292](mailto:ethan@abundanthousingla.org)

---

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:42 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

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## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

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**Matt Stauffer** <[REDACTED]>

Tue, Jan 26, 2021 at 10:15 AM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Matt Stauffer using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Matt Stauffer  
908 S Hobart Blvd Apt 504 Los Angeles, CA 90006-1265  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:52 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

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## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

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**Miles Stenehjem** <[REDACTED]>

Sat, Feb 13, 2021 at 3:12 PM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Miles Stenehjem using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Miles Stenehjem  
5556 1/2 E Echo St Los Angeles, CA 90042-4617  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Tue, Feb 16, 2021 at 10:32 AM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element <housingelement@lacity.org>

---

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

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Michael Stoppelman [REDACTED] >

Wed, Feb 3, 2021 at 11:44 AM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

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Personally sent by Michael Stoppelman using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Michael Stoppelman  
301 Ocean Ave # B216 Santa Monica, CA 90402-1406  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Feb 4, 2021 at 1:59 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,

The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

David Thomas [REDACTED]

Mon, Jan 25, 2021 at 3:59 PM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

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Personally sent by David Thomas using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

David Thomas

1234 Wilshire Blvd Apt 324 Los Angeles, CA 90017-1978  
[REDACTED]



**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:50 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]

**Housing Element** <housingelement@lacity.org>

---

**trees**

2 messages

---

**Holly Tilson** [REDACTED]  
Reply-To: Holly Tilson [REDACTED]  
To: "housingelement@lacity.org" <housingelement@lacity.org>

Mon, Feb 15, 2021 at 3:28 PM

Dear city officials,

Trees...why do we need trees? I believe this concept is part of our elementary school's curriculum so this should be a no-brainer to protect these necessary living beings.

Planning could deny relocating a garage from the alley to the street saving the existing curbside trees from being removed either because the developer create a "new" driveway or moves the existing driveway from one side of the property to the other necessitating the tree(s) removal for a new driveway or larger driveway and curb cuts. I see this all the time in my neighborhood.

As far as trees on private property, by allowing density and oversized houses on lots that originally had 45-55% open space the city is eliminating any room for trees to even be planted.

Water capture...I've noticed all the "good" work of requiring water barrels just go down the drain or rather down the street to the sewers and on out into the ocean. With any lot that is being scraped start requiring a cistern under the driveway or back yard. The water barrels are removed within a year or two or less. All that is left is a down spout that flows into a french drain out to the curb. I've even seen the sprinkler systems turned on and water come out the curbside drain. So much for the water percolating down through the soil to the groundwater table.

I think preserving our tree canopy should be a priority and funded as such. Once they are removed or die it's decades before or if there can ever be any recovery of every creature's quality of life.

Please support preserving our trees through common sense policies, Holly Tilson

---

**Housing Element** <housingelement@lacity.org>  
To: Holly Tilson <[REDACTED]>

Tue, Feb 16, 2021 at 10:48 AM

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team  
[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Brian Trautman &lt;[REDACTED]&gt;

Tue, Jan 26, 2021 at 6:09 AM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

It is disappointing that Planning does not intend to pursue the equitable distribution approach in the housing element update. Planning recently released an Initial Study for the housing element update which contains numerous inadequacies that merit serious concern. Planning's analysis suggests that the City can achieve over 80% of its RHNA target with no significant zoning or policy changes, and that the remaining 20% can be accommodated via already-in-progress community plan updates and changes to the City's Density Bonus program.

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Personally sent by Brian Trautman using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Brian Trautman  
6355 De Soto Ave Apt B130 Woodland Hills, CA 91367-2634  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:52 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

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## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

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**Carla Truax** [REDACTED]

Sat, Feb 13, 2021 at 9:23 AM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

We must use zoning changes to meet our urgent goals for affordable housing in LA.

Planning does not intend to pursue an equitable distribution approach in the housing element update. Planning recently released an Initial Study for the housing element update which contains numerous inadequacies that merit serious concern. Planning's analysis suggests that the City can achieve over 80% of its RHNA target with no significant zoning or policy changes, and that the remaining 20% can be accommodated via already-in-progress community plan updates and changes to the City's Density Bonus program.

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Thank you for your time and attention.

Personally sent by Carla Truax using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Carla Truax

2415 Thomas Ave Redondo Beach, CA 90278-1528

[REDACTED]

---

**Housing Element** <housingelement@lacity.org>

Tue, Feb 16, 2021 at 10:30 AM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,

The Housing Element Team

[Quoted text hidden]



Housing Element <housingelement@lacity.org>

---

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

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Zennon Ulyate-Crow [REDACTED]

Mon, Jan 25, 2021 at 2:13 PM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Zennon Ulyate-Crow using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Zennon Ulyate-Crow  
PO Box 680 Topanga, CA 90290-0680  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:47 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Lydia Valdez &lt;[REDACTED]&gt;

Wed, Feb 3, 2021 at 10:08 AM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Personally sent by Lydia Valdez using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Lydia Valdez  
720 N Louise St Glendale, CA 91206-2044  
[REDACTED]



**Housing Element** <housingelement@lacity.org>

Thu, Feb 4, 2021 at 1:57 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,

The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

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## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

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Henry van Moyland <[REDACTED]>

Mon, Jan 25, 2021 at 1:16 PM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Henry van Moyland using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Henry van Moyland  
808 S Dunsmuir Ave Los Angeles, CA 90036-4732  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:44 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element <housingelement@lacity.org>

# Fwd: Housing Element Environmental Impact Report - Opposition to Status Quo Plan

3 messages

**Cally Hardy** <cally.hardy@lacity.org>  
To: Housing Element <housingelement@lacity.org>

Mon, Jan 25, 2021 at 10:30 AM

----- Forwarded message -----

From: **Flora Melendez** <flora.melendez@lacity.org>  
Date: Mon, Jan 25, 2021 at 10:26 AM  
Subject: Fwd: Housing Element Environmental Impact Report - Opposition to Status Quo Plan  
To: Matthew Glesne <matthew.glesne@lacity.org>, Cally Hardy <cally.hardy@lacity.org>, Blair Smith <blair.smith@lacity.org>  
Cc: Arthi Varma <arthi.varma@lacity.org>

Hello.

I'm forwarding an email received by Vince.

Thank you.

~ Angie



**Flora (Angie) Melendez**  
Pronouns: she/hers/her  
Executive Administrative Assistant  
**Los Angeles City Planning**  
200 N. Spring St., Suite 525C  
Los Angeles, CA 90012  
Planning4LA.org  
T: (213) 978-1271 | F: (213) 978-1275  
E: flora.melendez@lacity.org



----- Forwarded message -----

From: **Vince Bertoni** <vince.bertoni@lacity.org>  
Date: Mon, Jan 25, 2021 at 10:22 AM  
Subject: Fwd: Housing Element Environmental Impact Report - Opposition to Status Quo Plan  
To: Flora Melendez <flora.melendez@lacity.org>

**Vincent P. Bertoni, AICP**  
Pronouns: He, His, Him  
Director of Planning  
**Los Angeles City Planning**



200 N. Spring St., Suite 525C  
Los Angeles, CA 90012



----- Forwarded message -----

From: **Elisa Visick** <[REDACTED]>  
Date: Mon, Jan 25, 2021 at 10:17 AM  
Subject: Housing Element Environmental Impact Report - Opposition to Status Quo Plan  
To: <[vince.bertoni@lacity.org](mailto:vince.bertoni@lacity.org)>

Dear Director of City Planning Vince Bertoni,

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Personally sent by Elisa Visick using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Elisa Visick  
429 1/2 N Avenue 57 Los Angeles, CA 90042-3405



--



LOS ANGELES  
CITY PLANNING

**Cally Hardy** (she/her/hers)  
City Planning Associate  
**Los Angeles City Planning**

200 N. Spring St., Room 750  
Los Angeles, CA 90012  
Planning4LA.org  
(213) 978-1643



**Blair Smith** <blair.smith@lacity.org>  
To: Housing Element <housingelement@lacity.org>

Mon, Jan 25, 2021 at 10:56 AM

[Quoted text hidden]



LOS ANGELES  
CITY PLANNING

**Blair Smith**  
City Planner  
**Los Angeles City Planning**

200 N. Spring St., Room 750  
Los Angeles, CA. 90012  
Planning4LA.org  
T: (213) 978-1886



**Housing Element** <housingelement@lacity.org>  
To: [Redacted]

Thu, Jan 28, 2021 at 4:23 PM

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Geneva Vogelheim &lt;[REDACTED]&gt;

Mon, Jan 25, 2021 at 1:57 PM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

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Personally sent by Geneva Vogelheim using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Geneva Vogelheim  
3770 Keystone Ave Apt 409 Los Angeles, CA 90034-6362  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:46 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]





Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Geneva Vogelheim <[REDACTED]>  
Reply-To: [REDACTED]  
To: vince.bertoni@lacity.org

Thu, Feb 11, 2021 at 7:59 PM

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

It is disappointing that Planning does not intend to pursue the equitable distribution approach in the housing element update. Planning recently released an Initial Study for the housing element update which contains numerous inadequacies that merit serious concern. Planning's analysis suggests that the City can achieve over 80% of its RHNA target with no significant zoning or policy changes, and that the remaining 20% can be accommodated via already-in-progress community plan updates and changes to the City's Density Bonus program.

The facts do not support these conclusions, and that Planning's "status quo" proposal is flawed for the following reasons:

Planning's "status quo" proposal fails to affirmatively further fair housing, which is required under state law. By planning for most housing growth on parcels where multifamily development is already allowed, the City is steering housing opportunities away from the 75% of the City's residentially-zoned land that is restricted to single-family housing only. This perpetuates historic patterns of segregation and exclusion, and continues to push housing opportunities for lower-income households towards lower-income neighborhoods.

Planning anticipates that under current zoning, Los Angeles can expect to build 307,000 more homes between 2022 and 2029. However, Los Angeles only permitted about 114,000 homes during the eight-year period ending in 2019, leading to a net increase of 99,000 homes during that time. Planning offers no convincing rationale for why they expect housing production to nearly triple without significant policy or zoning changes.

Planning's anticipated site inventory, where they expect the development of 307,000 more homes to occur, likely contains a large number of parcels zoned for multifamily residential development. This suggests that a large number of existing rent-stabilized housing units would be redeveloped under Planning's "status quo" approach, increasing lower-income renter households' risk of displacement.

Planning anticipates accommodating 93,000 homes primarily through a series of community plan updates that are already in progress. However, many draft community plan updates highlighted in the Initial Study, including updates for the Westside, Hollywood, Southwest Valley, Southeast Valley, and Purple Line Transit Neighborhood Plan, are unambitious and do little to create significant amounts of new housing capacity. This approach also allows high-resource neighborhoods whose community plan update processes have not yet started, like Brentwood-Pacific Palisades and Westwood, to avoid zoning reforms that are necessary to accommodate the City's RHNA goal. This is unfair.

I strongly oppose Planning's "status quo" approach to the housing element update, which would do little to meaningfully address unaffordable housing costs, lengthy commutes, poor air quality, displacement of lower-income renters, and segregated neighborhoods. Fortunately, with eight months remaining until housing element updates are due, there is still time to change course and create an equitable, transformative housing element. I urge you to instruct the Department of City Planning to take this important step for Los Angeles' future.

Personally sent by Geneva Vogelheim using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Geneva Vogelheim  
3770 Keystone Ave Apt 409 Los Angeles, CA 90034-6362  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Tue, Feb 16, 2021 at 10:24 AM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Tom Vosburgh [REDACTED]

Mon, Jan 25, 2021 at 6:26 PM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Personally sent by Tom Vosburgh using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Tom Vosburgh  
11833 Goshen Ave Apt 4 Los Angeles, CA 90049-6346  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:51 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

---

**City of Los Angeles, Department of City Planning ATTN: Cally Hardy, City Planning Associate Case Numbers: CPC-2020-1365-GPA; ENV-2020-6762-EIR**

2 messages

**Sarah Wauters** [REDACTED]

Tue, Feb 16, 2021 at 3:03 PM

Reply-To: [REDACTED]

To: housingelement@lacity.org

Cc: [REDACTED]

Dear Ms. Hardy,

I am writing to strongly advocate that the Housing Element 2021-2019 update should **consider the effect of added housing on existing trees**, which are impacted both on properties and in the parkways (often removed for construction), in the topics of the Environmental Impact Report (EIR). This would mean that any tree removal or damage due to construction would be examined thoroughly when development is being considered for approval. Trees are so much more important to our environment, on a cumulative basis, than many of the other factors being considered. They clean the air, mitigate particulate pollution, provide cooling effect, sequester carbon, contribute to mental health, contribute to biodiversity, and generally improve property values and tax basis in any urban environment. Los Angeles is a poor city and cannot afford to sacrifice valuable existing assets such as mature street trees (25+ years of asset accumulation) and trees on private property without very careful consideration. These assets benefit the very most vulnerable members of our society. The shortage of housing is not resultant from trees standing in the way - it is more likely that other older requirements - like too much parking - are causing the high cost of housing.

Name: Sarah R Wauters  
13700 Marina Pointe Dr, Marina Del Rey, CA 90292  
Cell phone: 917 822 2247

I am resident in the Venice Neighborhood Council district and I am actively engaged in the Venice Arbor Committee of the VNC.

Thank you for your consideration.

Sarah R Wauters

[REDACTED]  
Telephone 917 822 2247

---

**Housing Element** <housingelement@lacity.org>

Tue, Feb 16, 2021 at 4:28 PM

To: [REDACTED]

Cc: [REDACTED]

Thank you for your email. Your comment was submitted after the deadline for comments; the comment is marked late, but has been received and will be included in the environmental case file.

Regards,  
The Housing Element Team  
[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Alan Wayne &lt;[REDACTED]&gt;

Wed, Feb 3, 2021 at 8:41 AM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Personally sent by Alan Wayne using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Alan Wayne

603 Angelus Pl Venice, CA 90291-4916  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Wed, Feb 3, 2021 at 9:35 AM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,

The Housing Element Team

[Quoted text hidden]



Housing Element <housingelement@lacity.org>

---

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

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**Katherine Wegmann** [REDACTED]

Wed, Jan 27, 2021 at 4:13 PM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Personally sent by Katherine Wegmann using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Katherine Wegmann  
3608 Barham Blvd Apt U317 Los Angeles, CA 90068-1078  
[REDACTED]



**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:57 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]

**Housing Element** <housingelement@lacity.org>

---

## Housing Element 2021-2029 Update

4 messages

**Alexander Wikstrom** [REDACTED]  
To: housingelement@lacity.org

Fri, Feb 5, 2021 at 1:30 PM

Dear Ms. Hardy,

I am a resident of Beverly Grove who rents. I support the efforts that the draft plans in my area (Purple Line TNP) have made to expand housing opportunity. It is the City's obligation to make more housing possible for people of all incomes. I applaud the proposed change to allow up to 4 units per lot on 6th Street between Fairfax and San Vicente, where I live. I do have concerns that TOC bonuses may lead developers to target RSO-covered units along Orange Street just south of where I live. While I support having more housing in my neighborhood, there is the potential to evict tenants that are likely lower income than the neighborhood as a whole.

I do not want to discourage new housing in my area, but I believe the housing element citywide and the Purple Line TNP would greatly benefit from considering rezoning the R1-zoned properties roughly between Melrose to Olympic, from City limits with Beverly Hills and West Hollywood east to La Brea to allow more units, ideally at least 4 per lot. The ability for my street, 6th Street to have 4 units per lot would likely produce changes that are not going to result in eviction of existing tenants. Under current statewide ADU laws, these buildings can add 1-2 units already, and changing the zoning to be less restrictive with setbacks and parking could result in more housing along my street. This opportunity should be given to all single-family only lots in the area I described.

I have three reasons for supporting rezoning for more units on R1 zones. First, these areas already include some duplexes or ADUs. If these buildings are demolished, under current zoning laws, these would only be able to be replaced with single-family homes, the most unaffordable housing type. While this does not describe a great deal of properties in the area, these units could still disappear in favor of for-sale housing that is out of reach for the vast majority of Angelenos. Second, fourplexes and other small apartment buildings are part of this neighborhood's character. In areas where duplexes and apartment buildings exist, there is a great variety of unit sizes, which cater to different people with different needs. A single person may very well like a small studio, but even in multifamily settings, there are 3-bedroom units that can house families, friend groups, etc. Third, single-family homeowners, especially in my neighborhood, would be the least burdened by this rezoning. Homeowners would most likely profit greatly from selling their homes for redevelopment as apartments and doing so is completely voluntary, unlike the eviction process. These areas are still within a comfortable walking distance to shopping, restaurants, and transit, meaning that added traffic from higher density would likely not be a concern. I believe these areas could add density and put off plans that could demolish still dense buildings on Orange St.

Beverly Grove is a high opportunity area currently working on a new plan. The Purple Line TNP can be a great document that both emphasizes more housing along major boulevards, as well as within residential neighborhoods as I've described. The Housing Element of the General Plan should consider rezoning at least 4 units per lot in current R1 areas of Beverly Grove, Carthay, etc. The status quo that ends up evicting tenants locally as well as in other transit-adjacent neighborhoods can be mitigated by allowing housing growth everywhere in the neighborhood, as opposed to just 6th Street and Orange Street.

Sincerely,

Alexander Wikstrom

---

**Housing Element** <housingelement@lacity.org>  
To: Alexander Wikstrom [REDACTED]

Mon, Feb 8, 2021 at 11:48 AM

Thank you for your email. Your comments and/or attachments have been received and filed. Your message will also be forwarded to the [Purple Line TNP team](#) for review.

Regards,  
The Housing Element Team  
[Quoted text hidden]

**Housing Element** <housingelement@lacity.org>

Mon, Feb 8, 2021 at 11:48 AM

To: Alice Okumura <alice.okumura@lacity.org>, Renata Dragland <renata.dragland@lacity.org>, Matt Gamboa <matt.gamboa@lacity.org>

Forwarding this comment letter as it also contains comments relevant to the Purple Line TNP.

Best,  
Cally

[Quoted text hidden]

---

**Renata Dragland** <renata.dragland@lacity.org>

Mon, Feb 8, 2021 at 5:39 PM

To: Housing Element <housingelement@lacity.org>

Cc: Alice Okumura <alice.okumura@lacity.org>, Matt Gamboa <matt.gamboa@lacity.org>

Thank you, Cally!  
Hope all is well.

Renata



LOS ANGELES  
CITY PLANNING

**Renata D. Dragland**

Preferred Pronouns: She, Her, Hers

City Planner

**Los Angeles City Planning**

200 N. Spring St., Room 667

Los Angeles, CA 90012

T: (213) 978-1205 | Planning4LA.org



[Quoted text hidden]



Housing Element <housingelement@lacity.org>

# Fwd: Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

**Flora Melendez** <flora.melendez@lacity.org>  
To: Housing Element <housingelement@lacity.org>

Mon, Jan 25, 2021 at 11:42 AM

Hello.

I'm forwarding an email received by Vince.

Thank you.

~ Angie



LOS ANGELES  
CITY PLANNING

**Flora (Angie) Melendez**  
Pronouns: she/hers/her  
Executive Administrative Assistant  
**Los Angeles City Planning**  
200 N. Spring St., Suite 525C  
Los Angeles, CA 90012  
Planning4LA.org  
T: (213) 978-1271 | F: (213) 978-1275  
E: flora.melendez@lacity.org



----- Forwarded message -----

From: **Vince Bertoni** <vince.bertoni@lacity.org>  
Date: Mon, Jan 25, 2021 at 11:37 AM  
Subject: Fwd: Housing Element Environmental Impact Report - Opposition to Status Quo Plan  
To: Flora Melendez <flora.melendez@lacity.org>



LOS ANGELES  
CITY PLANNING

**Vincent P. Bertoni, AICP**  
Pronouns: He, His, Him  
Director of Planning  
**Los Angeles City Planning**  
200 N. Spring St., Suite 525C  
Los Angeles, CA 90012  
Planning4LA.org  
T: (213) 978-1271 | F: (213) 978-1275  
E: vince.bertoni@lacity.org



----- Forwarded message -----

From: **Kevin Wilen** [REDACTED]  
Date: Mon, Jan 25, 2021 at 11:34 AM  
Subject: Housing Element Environmental Impact Report - Opposition to Status Quo Plan  
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

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Personally sent by Kevin Wilen using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Kevin Wilen  
7100 Hillside Ave Apt 308 Los Angeles, CA 90046-2349  
[REDACTED]

---

Housing Element <housingelement@lacity.org>  
To [REDACTED]

Thu, Jan 28, 2021 at 4:37 PM

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team  
[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

---

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Jay Williams [REDACTED]  
Reply-To: [REDACTED]  
To: vince.bertoni@lacity.org

Wed, Feb 3, 2021 at 8:32 PM

Dear Director of City Planning Vince Bertoni,

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This piecemeal approach also allows high-resource neighborhoods whose community plan update processes have not yet started, like Brentwood-Pacific Palisades and Westwood, to avoid zoning reforms that are necessary to accommodate the City's RHNA goal. This is unfair.

I strongly oppose Planning's "status quo" approach to the housing element update, which would do little to meaningfully address unaffordable housing costs, lengthy commutes, poor air quality, displacement of lower-income renters, and segregated neighborhoods. Fortunately, there is still time to change course and create an equitable, transformative housing element. I urge you to instruct the Department of City Planning to take this important step for Los Angeles' future.

Personally sent by Jay Williams using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Jay Williams

2/16/2021

City of Los Angeles Mail - Housing Element Environmental Impact Report - Opposition to Status Quo Plan

645 W 9th St Los Angeles, CA 90015-1640

---

**Housing Element** <housingelement@lacity.org>

Thu, Feb 4, 2021 at 2:01 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,

The Housing Element Team

[Quoted text hidden]





Housing Element &lt;housingelement@lacity.org&gt;

---

**SUBMITTAL OF WRITTEN COMMENTS Housing/Safety Elements Updates and Draft EIR --- Request for Extension March 1, 2021**

6 messages

**Tom Williams** [REDACTED]

Fri, Feb 5, 2021 at 4:05 PM

To: "housingelement@lacity.org" &lt;housingelement@lacity.org&gt;, "cally.hardy@lacity.org" &lt;cally.hardy@lacity.org&gt;

TO: City of Los Angeles, Department of City Planning ATTN: Cally Hardy, City Planning Associate  
200 N. Spring Street, Room 750, Los Angeles, CA 90012 Phone: (213) 978-1643  
E-mail: [housingelement@lacity.org](mailto:housingelement@lacity.org) &

SUBJECT: NOP/Initial Study and Scoping Comments

RE: Request for Extension - Comment Review Period until Monday March 1, 2021

SUBMITTAL OF WRITTEN COMMENTS The Lead Agency solicits comments regarding the scope, content and specificity of the EIR from all interested parties requesting notice, responsible agencies, agencies with jurisdiction by law, trustee agencies, and involved agencies.

name: Dr Clyde Thomas Williams, Retired 1972-2012 environmental consultant for CEQA and NEPA worldwide

telephone: 323-528-9682

contact information [REDACTED] LA-32 NC Director [4117 Barrett Rd. LA, 90032-1712](#)

Notice of Preparation is being circulated for a 30-day comment period. Written comments are to be provided at the earliest possible date, but no later than 5:00 p.m. on February 15, 2021

Case Numbers: CPC-2020-1365-GPA; ENV-2020-6762-EIR

COMMENTS: I find, in general, that the NOP and Initial Study are inadequate and incomplete and not worthy of public review and consideration.

1. No State Clearinghouse OPR Doc number is provided for verification of notices and circulation.
2. Scoping must include more alternatives, however, as no clear and specific goals/objectives are provided and some vague topics cannot be quantified nor enumerated development of public support alternatives cannot be developed and submitted. Provide a clear definition and descriptions of current alternatives, and their goals/objectives/policies/plans for each as currently known and to demonstrate to the public as to the desired format for public sourced alternatives.
3. No references are provided regarding any numerical comparisons of alternatives are provided or request or considered and therefore the Public is constrained by the NOP/IS for these projects...two.
4. No references/comments are made to the required Mitigation, Monitoring, and/or Reporting requirements of the FEIR and I request that a "Draft MMRPlan" be provided in the DEIR in order for the Public to focus on such during the development and review of alternatives.

Based on these comments and documents deficiencies, I request a formal two week extension to March 1, 2021.

More comments and recommendations will be submitted and are expected to be incorporated into the preparation of the Draft EIR.

If no extension, other remedies may be sought.

---

**Richard Larsen** <[REDACTED]>

Fri, Feb 5, 2021 at 4:46 PM

To: Tom Williams <[REDACTED]>

Cc: "housingelement@lacity.org" <housingelement@lacity.org>, "cally.hardy@lacity.org" <cally.hardy@lacity.org>

Hello,

I agree with Tom Williams on all these points, it's hard for me to say which one stands out the most. However if I was pushed, i'd have to say putting out revision after revision without a trail is most unhelpful to our community of stakeholders. This is not allowing the Public to focus on the progress, or the outreach, for such determinations.

Although this is a draft stage, let's recognize where we are, and I don't see a ZIMAS search here.

sincerely,



**Richard W Larsen**

Board of Governors

Chair, Planning and Land Use Committee

**Lincoln Heights Neighborhood Council**

Los Angeles, California

[Quoted text hidden]

---

**Housing Element** <housingelement@lacity.org>

Mon, Feb 8, 2021 at 11:44 AM

To: Tom Williams <[REDACTED]>

Cc: "cally.hardy@lacity.org" <cally.hardy@lacity.org>

Dear Tom:

Thank you for your email. Unfortunately, due to the mandatory state deadline for adoption of the Housing Element Update, we are unable to extend the scoping period. Please know that there will be additional opportunity for public review and comment on the Draft EIR when it is released later this Spring.

Additionally, for your reference, the State Clearinghouse Number for the Project has been issued. The SCH number is: 2021010130

Regards,  
The Housing Element Team

On Fri, Feb 5, 2021 at 4:05 PM Tom Williams <[REDACTED]> wrote:

[Quoted text hidden]

---

**Housing Element** <housingelement@lacity.org>

Mon, Feb 8, 2021 at 11:45 AM

To: Richard Larsen <[REDACTED]>

Dear Richard:

Thank you for your email. Unfortunately, due to the mandatory state deadline for adoption of the Housing Element Update, we are unable to extend the scoping period. Please know that there will be additional opportunity for public review and comment on the Draft EIR when it is released later this Spring.

Regards,  
The Housing Element Team

[Quoted text hidden]

Richard Larsen <[redacted]>  
To: Housing Element <housingelement@lacity.org>

Mon, Feb 8, 2021 at 1:45 PM

Hello Housing Element,

The window of opportunity for comment was not in keeping with the scale of the proposal. That is a flaw in outreach and representative governance. The Alliance of River Communities just hosted a presentation last week with Matthew Glesne. There were plenty of remarks and there is no sense that the Department is listening. Glesne had no answers. This endeavor also looks suspect when it is announced that CDO's will be used to underwrite Ordinances that our community is clearly against.

If DCP continues to walk over public input, it looks like an autocracy, and not a democracy.

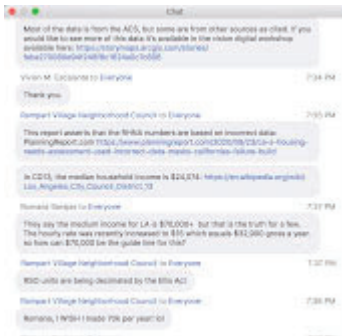
One can anticipate the results.



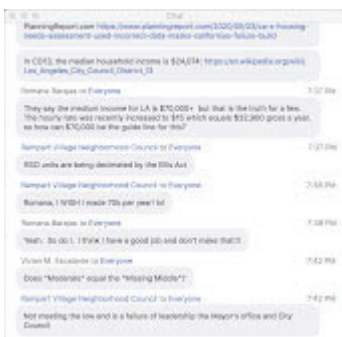
Richard W Larsen  
Lincoln Heights Neighborhood Council

[Quoted text hidden]

3 attachments

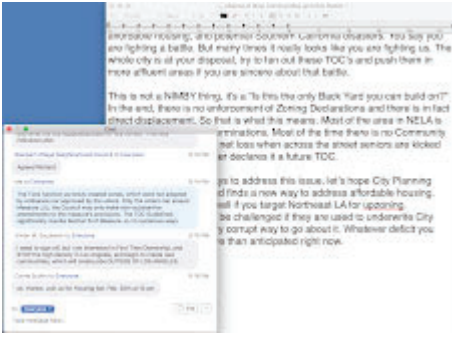


Screen Shot 2021-02-02 at 7.40.19 PM (2)\*.png  
280K



Screen Shot 2021-02-02 at 7.43.49 PM (2)\*.png  
260K

Screen Shot 2021-02-02 at 8.16.34 PM (2)\*.png  
543K



**Housing Element** <housingelement@lacity.org>  
 To: Richard Larsen [REDACTED]

Mon, Feb 8, 2021 at 2:50 PM

Richard:

The Department will be coordinating additional public outreach seeking community input on the draft plan later this Spring. Additionally, you can find more information about the plan update on [our website](#). There is also a feedback survey on our concepts [available here](#).

Regards,  
 The Housing Element Team

[Quoted text hidden]



Housing Element <housingelement@lacity.org>

## Re: SUBMITTAL OF WRITTEN COMMENTS Housing/Safety Elements Updates and Draft EIR 2021010130

2 messages

Tom Williams [REDACTED]

Tue, Feb 9, 2021 at 3:14 PM

To: Housing Element <housingelement@lacity.org>

Cc: "cally.hardy@lacity.org" <cally.hardy@lacity.org>

DATE: 020921

TO: City of Los Angeles, Department of City Planning ATTN: Cally Hardy, City Planning Associate

200 N. Spring Street, Room 750, Los Angeles, CA 90012 Phone: (213) 978-1643

E-mail: [housingelement@lacity.org](mailto:housingelement@lacity.org) &

SUBJECT: NOP/Initial Study and Scoping Comments for Housing Element Draft EIR  
Case Numbers: CPC-2020-1365-GPA; ENV-2020-6762-EIR OPR/SCH-2021010130

RE: Request for Extension of Comment Review Period until Monday March 1, 2021 and Other Comments for NOP/IS #2

FROM: name: Dr Clyde Thomas Williams, Retired 1972-2012 environmental consultant for CEQA and NEPA worldwide

telephone: 323-528-9682 contact information [REDACTED] LA-32

NC Director [4117 Barrett Rd. LA, 90032-1712](http://4117BarrettRd.LA.90032-1712)

COMMENTS: I find, in general, that the Initial Study are inadequate and incomplete and not worthy of public review and consideration.

### CONTENTS

Provide Goals/Objectives for each Housing, Rezoning, and Safety; provide quantitative

Provide statutory importance of each - Rezoning (City Ordinance) vs Housing or Safety Elements (Director decisions).

Action Plan: Goals, policies and programs to share future decision making. Programs that will help us realize our vision.

### SCHEDULE

Provide detailed weekly schedule and bases for justifying the minimal time periods for Public Reviews/Comments compared to financial supported preparations.

Provide detailed weekly schedule for all Dpt.CityPlng.activities and all contractual schedules for preparation of NOP/IS, NOA, DEIR, FDEIR, and NOD.

and correlate CEQA scheduled items with those of the DRAFT Plan Update - Winter 2021 > Draft 2021-2029 > Housing Element Shared Online Review the Draft Plan and provide comments online.

### OTHERS

Provide a clear definition and descriptions of current alternatives, their goals/objectives/policies/plans achievements and quantitative assessments for each as currently known.

Provide a Pre-EIR quantitative comparison of alternatives to demonstrate to the Public as to the desired format for public sourced alternatives.

**HOUSING BASIS**

Provide current SCAG population projections used in all current Community Plans which have passed Scoping and compared those to same for RHNA.

Provide current project 2030 and 2040, and 2045 populations, households, and jobs by Community Plan area and comparisons with RHNA population/Hhd./Jobs allocations to community plans.

Provide comparison of all existing specific plan areas for residential portions and their current and projected housing units without update modifications and those likely with housing update conditions modifications proposed for lands within 1000ft of Specific Plan boundaries.

Provide projected Population/Households/Jobs and current/projected area capacities by Zip codes and for accumulative Community Plan Areas.

Provide alternative for completion of development for all currently zoned residential properties and for all parcels of >6000sqft with existing single family dwelling AND suitable 1000sqft Accessory Dwelling Unit .

Provide for suitable transitions for all Transit Oriented Corridors with Com. or R5 immediately adjacent to the transit route, with R4 of 100+ft zone, then R3 of 100+ft zone, and R2 of 100+ft zone between the transit route and R-1 zone parcels.

**FOR SAFETY**

Provide map of all ZIMAS assigned surface fault zones and tables for residential zoning, populations, households, and jobs within surface fault zones and with maximum anticipated earthquake.

Provide map of all ZIMAS assigned landslide zones and tables for residential zoning, populations, households, and jobs within surface fault zones and with maximum anticipated earthquake.

Provide map of all ZIMAS assigned liquefaction zones and tables for residential zoning, populations, households, and jobs within surface fault zones and with maximum anticipated earthquake.

Provide map of all ZIMAS/other assigned surface fault zones and tables for all hospitals, gas/petroleum storage of >1000gal, gas /petroleum pipelines (>8in diam.), road bridges, tunnels (>8ft diam.), and fire stations within surface fault zones and with maximum anticipated earthquake and those within 500ft of such zones.

Provide map of all ZIMAS assigned surface fault zones and tables for all existing/orphaned-derelict-idled wells (>500ft depth) within surface fault zones and with maximum anticipated earthquake and those within 500ft of such zones..

Revise DEIR to include the Initial Study-removed Mineral Resources and therefore related O Conditions (Rezoning) and Idled/Active/Abandoned-Derelict oil wells and their potential impacts on housing within 2500ft of such features (recorded on DCP-ZIMAS).

Revise DEIR to include the Initial Study-removed Energy and therefore related conditions, Methane Zone, (Rezoning) for current and future housing above existing and changing natural gas storage facilities, e.g., SCGasCo Playa Del Rey Gas Storage Facility and related wells and seeps recorded on DCP-ZIMAS.

Revise DEIR to include the Initial Study-removed Wildfire and therefore related conditions (Rezoning), designated Very High Fire Hazard Severity (VHFHS) as recorded on DCP-ZIMAS.

Provide references regarding any numerical comparisons of alternatives by DCP constrained by the NOP/IS for these projects.

No references/comments are made to the required Mitigation, Monitoring, and/or Reporting requirements of the FEIR; I request that a "Draft MMRPlan" be provided in the DEIR in order for the Public to focus on such during the development and review of alternatives.

---

**Housing Element** <housingelement@lacity.org>  
To: Tom Williams [REDACTED]>  
Cc: "cally.hardy@lacity.org" <cally.hardy@lacity.org>

Tue, Feb 16, 2021 at 10:15 AM

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team  
[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Fw: Housing Element Public Comments Initial Study 2021 #3

2 messages

Tom Williams &lt;[REDACTED]&gt;

Thu, Feb 11, 2021 at 8:59 PM

To: "housingelement@lacity.org" &lt;housingelement@lacity.org&gt;, "cally.hardy@lacity.org" &lt;cally.hardy@lacity.org&gt;

DATE: 021121

TO: City of Los Angeles, Department of City Planning ATTN: Cally Hardy, City Planning Associate

200 N. Spring Street, Room 750, Los Angeles, CA 90012 Phone: (213) 978-1643

E-mail: [housingelement@lacity.org](mailto:housingelement@lacity.org) &

SUBJECT: NOP/Initial Study and Scoping Comments for Housing Element Draft EIR

Case Numbers: CPC-2020-1365-GPA; ENV-2020-6762-EIR OPR/SCH-2021010130

RE: Request for Extension of Comment Review Period until Monday March 1, 2021 and Other Comments for NOP/IS #3

FROM: name: Dr Clyde Thomas Williams, Retired 1972-2012 environmental consultant for CEQA and NEPA worldwide

telephone: 323-528-9682 contact information [REDACTED] LA-32 NC Director 4117  
Barrett Rd. LA, 90032-1712

COMMENTS: I find, in general, that the Initial Study sections are inadequate and incomplete and not worthy of public review and consideration.

As indicated in previous comment submittals and those to follow, the current NOP and IS are totally inadequate for review and meaningful comments and I again request an extension of two weeks to March 1, 2021.

### CONTENTS

Chapter 5 IS Review of The 2006-2014 Housing Element, "...goals, objectives, and policies of the previous Housing Element [2006-14] were carried forward into the 2013-2021 Housing Element Update, enhanced, expanded, and reconfigured with additional details in order to more clearly define the City's strategy in addressing housing needs."

The Housing Element...Identifies The City...Housing Needs And Establishes Clear **Goals And Objectives To Inform** Housing Policy Discussions At The Citywide Level.

The overarching **goals** of the Housing Element that embody the City's commitment to meeting housing needs are:

-To produce and preserve an **adequate** supply of **ownership and rental housing**...safe and healthy; affordable to people of **all income levels, races, and ages; and suitable** to their various needs.

-To ensure housing that **helps** to create safe, livable, and sustainable neighborhoods.

-To ensure that housing opportunities are **available** to all without **discrimination**.

-To prevent and end chronic homelessness.

The City is currently working on an update to the Housing Element....2013-2021 Housing Element is active until the 2021-2029 update is adopted (with a target adoption date of October 2021).

Please visit the [Housing Element Update](#) page to learn more about the process.

### ***Provide objectives for all goals and the policies/programs to achieve such.***

***Provide numerical/quantified comparisons of 2006-14, 2012-2021, and 2021-2029 goals and objectives, proposed and achieved.***

***Define inform.***

<https://planning.lacity.org/plans-policies/housing-element-update> Housing Policy Webpage City Planning's Housing Strategies Aim To Make Los Angeles More Equitable, Livable, And Affordable For All Residents.

***Provide table of comparison for 2020/21 and 2019 housing ownership and tenancy, incomes, education, ethnicity, and population by 10%iles units of residents in LA.***

***Provide quantitative/quantified for all alternative comparisons***

The main factors included in the allocation methodology are household growth (based on the Connect SoCal, or SCAG Regional Transportation Plan/Sustainable Communities Strategy [RTP/SCS] growth forecast), job accessibility, transit accessibility, and socioeconomic conditions. The current **RHNA projection period** covers an eight-year period from October 2021 to October 2029.

IS-9/3 The main factors included in the allocation methodology are **household growth** (based on the Connect SoCal, or SCAG Regional Transportation Plan/Sustainable Communities Strategy [RTP/SCS] growth forecast), **job accessibility, transit accessibility, and socioeconomic conditions**. The current RHNA projection period covers an eight-year period from October 2021 to October 2029.

***Provide current and projected SCAG growth by Transportation Analysis Zones within LACity for population, households, jobs, education, and incomes.***

***Provide projections and City achievement of SCAG projections for 2012-21 and 2003-12.***

***Provide balances of jobs and pathways for employees between TAZs.***

15/4 Of these, approximately 36,316 have already received approval by the City and therefore are not analyzed in this study, except under a **cumulative impact analysis**.<sup>11</sup> This analysis included units anticipated to result from the data sources shown in Table 4.

***Provide for detailed cumulative impact analyses for employee pathways and transport modes between all TAZs related to LACity TAZs, say within 10 miles of LACity boundaries.***

15/FN11 These units would have been cleared under CEQA previously either with a new CEQA clearance, a finding they were previously subject to environmental review in a prior clearance or are exempt, including under a ministerial exemption. They will be considered under **cumulative impact analysis** unless already constructed and operational

***Provide tables and maps of units by TAZs cleared through 2012-21 EIR(s) along with their supported population and households.***



16/3 Although housing is allowed...(through **adaptive reuse rules**), it is reasonable to assume that the geographic distribution of the identified capacity will **largely be consistent** with that of **recent** building permit activity and areas of the City that are **currently zoned for multi-family and commercial development**;

however, it is possible that sites are identified in any area where the zoning permits residential uses, including lower density residential sites.

Based on the City's existing **growth strategy**, much of this capacity is likely to be identified along commercial corridors and existing multi-family neighborhoods located in proximity to public transportation. A large portion of the anticipated housing capacity is expected to be located within a Transit Oriented Communities Area, which is defined as the half-mile radius of a Major Transit Stop.

Figure 3 illustrates the potential geographic locations **in which sites are likely to be identified**, including areas zoned for residential use and areas located within a half-mile of a Major Transit Stop.

***Provide table and maps of all "adaptive reuse" ordinances, zonings, changes/variances to prior zoning, and project approvals 2012-2021.***

***Provide tables and maps of all 2012, 2020, and 2021 zoning for multi-family (by R2, R3, R4, and R5) and by ReZoneLA designations for the same and for those likely to be identified.***

***Provide current/existing "growth strategy(ies)" for City and changes from past strategies (2015-20).***

***Provide map of all "Major Transit Stops" and current and 2019 land uses and zoning within 2700feet of the stops.***

22/2 Anticipated Geographic Distribution of Rezoning Program As previously described, it is anticipated that some or most of the shortfall will be accommodated through rezoning efforts in the pending Community Plan Updates. Most rezoning is anticipated to occur in geographic areas that are similar to those identified in the **Inventory of Sites** (i.e. areas near public transit, jobs, and in **existing growth areas** identified in the Framework Element).

***Provide maps of Inventory of Sites and tables of SCAG projected jobs, populations, households, and employee travel between residences and job sites by SCAG-TAZs.***

***Provide maps of existing growth areas and TAZs and their project changes for 2029 and 2045.***

22/3 It is **reasonably foreseeable** that rezoning would occur in areas identified in the General Plan including **near transit corridors and stations, job centers, neighborhood services and amenities**, and particularly in **higher resourced areas** to provide a **more equitable distribution** of housing opportunities.

***Provide definitions and quantifications of "reasonably" and "foreseeable", Job centers, "higher resourced areas",.***

***Provide numerical basis for more equitable distribution by TAZ.***

***Provide maps and tables by TAZs for equitable distribution areas for transit corridors, stations, job centers, services/amenities, and Higher/Medium/Low resourced areas.***

34/2 As discussed above, the proposed project involves the potential construction and operation of between 419,261 and 429,261 housing units. **Based on the City's existing growth strategy**, most development sites are likely to be identified along commercial corridors and existing multi-family neighborhoods located in proximity to public transportation

***Provide current/existing "growth strategy(ies)" for City and changes from past strategies (2015-20) and their "basis" for locating.***

***Provide basis for identification of "development sites".***

43/4 These thresholds are designed such that a project that would not exceed the **adopted thresholds** would not have an individually or cumulatively significant impact on the Basin's air quality. Therefore, a project that does not exceed these

SCAQMD thresholds would have a less than significant impact.

**Define thresholds and provide numerical basis and computerized models for their definitions, assignments, and estimations by air pollutant, e.g., O3, NOX, CO2, nm-VOC, TP, and respirable particulate.**

44/1 These represent the levels at which a **project's** individual emissions of criteria air pollutants or precursors would result in a **cumulatively considerable** contribution to the Basin's existing air quality conditions

**Provide numerical model for "project" level air pollutants/pre-cursors and map for suitable land uses zones/locations.**

44/2 As discussed in Proposed Project, project development involves the potential construction and operation of between 419,261 and 429,261 housing units. The proposed project would **concentrate growth** in the City as opposed to elsewhere in the SCAQMD region. **Based on the City's existing growth strategy**, most development sites are likely to be identified along commercial corridors and existing multi-family neighborhoods located in proximity to public transportation

**Provide current/existing "growth strategy(ies)" for City and changes from past strategies (2015-20) and their "basis" for locating.**

**Provide numerical model for "concentrating growth" along commercial, multi-family, and transportation corridors**

**Define "likely".**

64/3 As discussed in Proposed Project, project development involves the potential construction and operation of between 419,261 and 429,261 housing units to meet the City's RHNA. **Based on the City's existing growth strategy**, most development sites are **likely** to be identified along commercial corridors and existing multi-family neighborhoods located **already served by energy providers**. Nonetheless, project development would consume energy during construction and operation through the use of petroleum fuel, natural gas, and electricity, as further addressed below.

**Provide current/existing "growth strategy(ies)" for City and changes from past strategies (2015-20) and their "basis" for locating.**

**Provide numerical model for "concentrating growth" along commercial, multi-family, and energy corridors. Clarify use of energy and transportation corridors.**

**Define "likely".**

**Provide safety comparisons for commercial/multi-family, transportation, and energy corridors and those of low density, non-commercial, low traffic, and low energy services areas or corridors.**

City Planning collaborates with other City departments to meet these goals through implementation of the several ordinances and initiatives.

**Provide listing and specifics as to collaboration via ordinances and "initiatives" with other departments of the City.**

IS-109/1 The Housing Element Update is **forecast** to result in a **substantial** net increase..., including a total target zoned capacity of 230,338 units for lower income households identified in the Sites Inventory,

**Provide computerized numerical databased model for the Housing Element along with SCAG-RHNAs and TAZs projections.**

**Define "substantial" and provide numerical measures for such.**

and it is anticipated that any replacement housing need created by **displacement of existing housing would be more than offset** through implementation of the Housing Element and potential **re-zone program**.

***Provide computerized numerical databased model for the Housing Element along with SCAG-RHNAs and TAZs projections and identify specific areas (>5 parcels) that could be subject to temporary displacements along with "offsets" within a three-year period.***

Therefore, **impacts related to displacement** associated with the Housing Element Update would be **less than significant**.

..., as discussed under **Safety Element Update of this section**, the Safety Element Update's potential impacts related to displacement will be further discussed in the EIR.

***Provide maps and tables of current-2020-21 and past (2012-2019) displacements and their significance.***

---

**Housing Element** <housingelement@lacity.org>  
To: Tom Williams [REDACTED]  
Cc: "cally.hardy@lacity.org" <cally.hardy@lacity.org>

Tue, Feb 16, 2021 at 10:25 AM

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team  
[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Re: Housing Element Public Comments Initial Study 2021 #4

3 messages

Tom Williams &lt;[REDACTED]&gt;

Fri, Feb 12, 2021 at 2:04 PM

To: "housingelement@lacity.org" <housingelement@lacity.org>, "cally.hardy@lacity.org" <cally.hardy@lacity.org>, "Matthew.Glesne@lacity.org" <Matthew.Glesne@lacity.org>

DATE: 021221

TO: City of Los Angeles, Department of City Planning ATTN: Cally Hardy, City Planning Associate [200 N. Spring Street, Room 750, Los Angeles, CA 90012](#) Phone: (213) 978-1643  
E-mail: [housingelement@lacity.org](mailto:housingelement@lacity.org) &

SUBJECT: NOP/Initial Study and Scoping Comments for Housing Element Draft EIR  
Case Numbers: CPC-2020-1365-GPA; ENV-2020-6762-EIR OPR/SCH-2021010130

RE: Request for Extension of Comment Review Period until Monday March 1, 2021 and Other Comments for NOP/IS #4

FROM: name: Dr Clyde Thomas Williams, Retired 1972-2012 environmental consultant for CEQA and NEPA worldwide  
telephone: 323-528-9682 contact information [REDACTED] LA-32 NC Director [4117 Barrett Rd. LA, 90032-1712](#)

COMMENTS: I find, in general, that the Initial Study sections are inadequate and incomplete and not worthy of public review and consideration.

As indicated in previous comment submittals and those to follow, the current NOP and IS are totally inadequate and poorly edited for review and meaningful comments and I again request an extension of two weeks to March 1, 2021.

Please provide an extension of the Scoping Comment period of two weeks, until March 1, 2021 as the volume of the Initial Study and poor quality editing and incompleteness of analyses require massive time allocation for the usually simple act of review/comment for scoping the DEIR.

### CONTENTS

**NOP:** Alternatives to be analyzed in the EIR are to be defined and analyzed consistent.... The specific alternatives to be evaluated will include a "No Project" alternative, as required by CEQA, and may include land use configurations.

2/ ...our responses to this Notice of Preparation (NOP), at a minimum should identify: (1) the significant environmental issues and **reasonable alternatives and mitigation measures** that **your agency** will need to have explored in the EIR;...

6/ Alternatives to be analyzed in the EIR are to be defined and analyzed consistent with the requirements of CEQA Guidelines, Section 15126.6. The specific alternatives to be evaluated will include a "No Project" alternative, as required by CEQA, and may include land use configurations.

**Alternative are directed to "agencies" and public is not specifically requested to provide alternatives.**

**Provide NOP and IS with specific alternatives to be considered and how to develop alternatives based on Project goals/objectives.**

**Initial Study:** No "Alternative" mentioned – Not even Do Nothing alternative. As the NOP/IS do not even mention alternatives or mitigative alternatives the entire NOP/IS are incomplete and inadequate.

**Provide NOP and IS with specific alternatives to be considered and how to develop alternatives based on Project goals/objectives.**

**Provide Focused Alternative with all housing projections limited to sites within 500ft of existing transit lines/routes and elimination of all zoned-designation as residential parcels which have not been permitted or constructed within 20 years of their residential zoning.**

***Provide ReDevelopment Alternative of all industrial/manufacturing zoned parcels within 5mi of DTLA for R3-R5 or mixed use C/R parcels.***

15/4 In addition, the City's **Site Inventory** may account for **pipeline housing development projects** that have **not yet been completed during this planning cycle**. These include **pending, approved or permitted housing development projects** that are expected to receive a Certificate of Occupancy (COO) after the beginning of the 2021-2029 planning period.

***Provide definitions and differentiations of SI units and IOS units, if any.***

***Provide definitions, tables and maps for the "Housing Projects Pipeline" in Los Angeles and the fact that 1000s of parcels have been zoned but no occupancy or even building permits have been issued for more than 20 years. Provide tables and maps derived from ZIMAS by CCD, NCA, and Zipcodes and appropriate tables for all zoned and rezoned but vacant lots by decadal periods – 1920-30, 31-40, 41-50, 51-60, 61-70, 71-80, 81-90, 91-2000.***

***Provide description, tables, and maps for the last 2+Current/6<sup>th</sup>-5<sup>th</sup>-4<sup>th</sup> Housing programs with suitable Pipeline categories – vacant-no permits, vacant-permit to construct, under construction, construction-no Occ.Permit, and Occupancy permit issued, and occupied.***

16/1 2 As a result, the City conservatively estimates that the **Inventory of Sites** will identify a total capacity of 408,412 units. Anticipated Geographic Distribution of **Sites Inventory**

***Provide definitions and differences between IOS and Sis. If different provide maps and tables for SI and IOS areas.***

19/3 Rezoning programs will do all of the following: 1. Evaluation and Rezoning to **Comply with AFFH Requirements**. Evaluate geographic distribution of **identified capacity** to determine how well it complies with AFFH requirements; if it is determined that the **sites inventory** results in an **over-concentration of lower-income sites** in **areas** of **high segregation and poverty**, the rezoning program will work to identify and **prioritize areas** for **up-zoning** in **areas** of moderate, high, and highest resources.

***Provide tables, maps, and computerized model for comparisons of IOS distribution compared to that required by AFFH.***

***Provide tables, maps, and computerized model for identified capacity, sites inventory, over-/on-/under concentrations, for high-/moderate-/low-segregation/ownership/income (= poverty).***

***Provide tables, maps, and computerized model for low/deficit (0-30%ile), moderate (31-60%ile), high (60-90%ile), and highest (91-100%ile) of resources. Provide definitions, tables, and computerized model for identification and prioritizing areas for up-/maintain-/down-zoning based on resources available.***

***Provide differences if any of IOS and "sites inventory" and if different provide separate development of the above for each.***

23/1 Pursuant to Government Code section 65583.2(h), for any rezoning needed to accommodate a RHNA shortfall for lower income households, the Housing Element Update will include an **inventory of potential sites for rezoning**. The inventory of potential sites for rezoning would include **specified density ranges** that could be achieved through a rezoning program; however, the inventory would not constitute formal adoption of any rezoning. Rezoning would occur as a **subsequent discretionary action**.

***Provide tables, maps, and computerized model for potential and actual sites for rezoning and for zoning of OS or PF parcels.***

***Provide definitions/differentiation of "specific density ranges" of parcels (units) and acreages for household/units and for populations and provide suitable maps and tables for such by rezoning areas.***

***Provide maps, tables, and computerized models for IOPS and IOS and comparisons of IOS:IOPS by specific areas (CCDs, NCAs, and Zipcodes).***

***Provide listing of all discretionary and non-discretionary actions for Rezoning/Zoning and for Housing Element and Safety Element.***

23/2 These units may occur anywhere in the City where residential uses are permitted, as described below. While some units are anticipated to be built on the **Opportunity Sites identified in the Housing Element Inventory of Sites**, it is not reasonable to expect that housing development will occur solely on those **Opportunity Sites**.

24/2 **Opportunity Sites** identified in the Housing Element Inventory of **Sites**

***Provide maps, tables, and computerized models for Inventory of Sites, with Opportunity and Non-Opportunity sites by CCD, NCAs, and Zipcodes.***

***Provide maps, tables, and computerized model for Housing Element-IOs and Rezoning-IOs for the City.***

34/1 As discussed above, the proposed project involves the potential construction and operation of between 419,261 and 429,261 housing units. Based on the City's existing growth strategy, most development sites are likely to be identified along commercial corridors and existing multi-family neighborhoods located in proximity to public transportation. For **those sites identified in the Inventory of Sites**, project development would need to comply with applicable zoning (i.e., floor area ratio (FAR), building heights and setbacks, and height requirements) and other regulations governing scenic quality and, therefore, would **not be expected to result in impacts to existing visual character or quality of public views**. Furthermore, the Rezoning Program would **primarily** target rezones of sites with **proximity to public transportation and jobs**. Nonetheless, it is also possible that **sites are identified in any area where the zoning permits residential uses or as part of the Rezoning Program**, including lower density residential sites with a particular visual character. As such, the proposed project would facilitate new residential development and allow for higher densities than currently exists in some areas and **may have the potential to visually degrade** the character or quality of sites or areas of the City or surrounding areas (e.g., change FAR, building height, and massing), particularly for **sites identified as part of the Rezoning Program**. The project's potential impacts related to visual character or quality of public views of the proposed project on sensitive receptors will be further analyzed in an EIR.

***Provide maps, tables, and computerized model for IOs sites, their preceding/updated zoning and site conditions.***

***Provide a concordance for all updated zoning categories for visual characterization with appropriate conditions and features established by the City Urban Design groups and participants.***

***Define "primarily" and substitute numerical/quantitative estimates.***

***Provide tables, maps, and computer model using ZIMAS database to establish proximity/distances for public transit (routes/stops) and jobs by/for each rezoned site.***

***Provide table, map, and example pictures of existing visual character and quality of view.***

***Provide tables, and maps and computerized model for all sites/areas within existing zoned or rezone program areas.***

***Provide tables, maps, and computerized model for "potential" (at least 5 classes) visual degradation.***

100/2 Recent changes to state Housing Element law have strengthened housing replacement requirements related to the Inventory of Sites....must demonstrate compliance with AB 686 by incorporating an **analysis of how the sites are consistent with AFFH goals**. For non-vacant sites, the methodology used to identify **realistic development potential** must consider factors such as existing uses, past development trends, **market conditions**, and the availability of regulatory and/or other **development incentives**.

***Provide comparisons of replacement requirements for 2013-2021 and for 2021-2029, and provide quantifications and numerical parameters (and a computerized model/program) for all "non-vacant sites".***

***Provide numerical/quantified analyses (with computerized model incorporating ZIMAS database) for all sites and parameters for demonstrating "consistency" with AFFH goals (which must also be quantified and numerical).***

**Provide definitions of “realistic”, “development potential”, “market conditions”, and “other development incentives”.**

**Given inclusion of “market conditions” and “other development incentives”, provide a market, incentives, and economic/financial analyses and program/model for the entire Housing Element Update, Infrastructure and Safety Elements/measures & requirements, and Rezoning.**

109/1 The Housing Element Update is **forecast** to result in a **substantial net increase** in the number of available housing units in the City, including a total target zoned capacity of 230,338 units for lower income households identified in the Sites Inventory, and it is anticipated that **any replacement housing need** created by displacement of existing housing would be more than offset through implementation of the Housing Element and potential **re-zone program**. Therefore, impacts related to displacement associated with the Housing Element Update would be **less than significant**. Nonetheless, as discussed under Safety Element Update of this section, the Safety Element Update’s potential impacts related to displacement will be further discussed in the EIR.

**Provide definitions and differences between “re-zone program” and “Rezone Program”**

**Provide definitions and differences of “forecast” and projections or updates.**

**Define “substantial”.**

**Provide tables, maps, and computerized numerical model for area-by-area of replacement needs. No delineated area (e.g., by Zip Code or Neighborhood Council areas) should experience more than a 5% locally uncompensated change of replacement vs new housing units.**

**Provide quantification/numerical estimates and limits for “significant”.**

Tom Williams <[REDACTED]>

Mon, Feb 15, 2021 at 2:03 PM

To: "housingelement@lacity.org" <housingelement@lacity.org>, "cally.hardy@lacity.org" <cally.hardy@lacity.org>

Cc: Matt Glesne <matthew.glesne@lacity.org>

DATE: 021521

TO: City of Los Angeles, Department of City Planning ATTN: Cally Hardy, City Planning Associate

200 N. Spring Street, Room 750, Los Angeles, CA 90012 Phone: (213) 978-1643

E-mail: [housingelement@lacity.org](mailto:housingelement@lacity.org) &

SUBJECT: NOP/Initial Study and Scoping Comments for Housing Element Draft EIR

Case Numbers: CPC-2020-1365-GPA; ENV-2020-6762-EIR OPR/SCH-2021010130

RE: Request for Extension of Comment Review Period until Monday March 1, 2021 and Other Comments for NOP/IS #4

FROM: name: Dr Clyde Thomas Williams, Retired 1972-2012 environmental consultant for CEQA and NEPA worldwide

telephone: 323-528-9682 contact information [REDACTED] LA-32 NC Director 4117  
Barrett Rd. LA, 90032-1712

COMMENTS: I find, in general, that the Initial Study sections are inadequate and incomplete and not worthy of public review and consideration.

Placing the Comments Deadline on a national holiday for which City offices are closed and staff are on Long Weekend Holiday leave places the Public at a disadvantage which is usually address by postponing the submission deadline until the next operating workday ...February 16, 2021. Additional comments shall be submitted on 021621 and if not included in DEIR shall be grounds for appeal for the entire CEQA process.

As indicated in previous comment submittals and those to follow, the current NOP and IS are totally inadequate for review and meaningful comments and I again request an extension of two weeks to March 1, 2021.

## CONTENTS

Numerical designation 3/5 indicates the Notice of Preparation page/paragraph for each comment. Provide requires that the DEIR include the requested provision.

3/5 **This study** analyzes the programs and policies contained in the draft Housing Element that have the potential to result in **physical environmental effects**, the **Inventory of Sites and Rezoning Program** needed to demonstrate **zoned capacity** needed to accommodate the City's RHNA allocation, in addition to the construction and operation of... housing units, which is intended to provide a **conservative analysis of the "worst-case" scenario** of environmental impacts from **future implementation** of the 2021-2029 Housing Element (see **Proposed Project** section of this **introduction**).

***Mixing of IOS which is part of the Housing Element (which is policy and guidance) and Rezoning Program (regulations, ordinances, and laws) by so mixing, the Project become uniformly strict at the level of Zoning/Rezoning, as an ordinance requiring a status identical to a specific plan, and requiring City Council discretionary decisions.***

***Provide definition of "conservative analyses" and "worst case."***

***Provide definitions of "Project" and distinguishing actions for "project".***

***Provide definitions and differentiating/complementary tasks for all "programs" and "policies" differentiating between Housing and Safety Elements, Inventory of Sites, and Rezoning for this Project.***

***Provide definition and description of "future implementation" and "implementation programs" of the Project.***

***Provide editorial consistency through DEIR with capitalization for Project including Inventory of Sites AND Rezoning Program, as would be done for a "Specific Plan" (e.g., Cornfields-Arroyo Seco SP). Require for the Plan and DEIR that all provisions and measures be assumed equivalent to ordinances and NOT GUIDELINES OR POLICIES.***

4/2 To comply with these requirements, the implementation programs of the **Housing Element must** affirmatively **further fair** housing and **must** include an **assessment of fair housing**. The City currently has an adopted Assessment of Fair Housing (AFH) plan (adopted in 2017) and **anticipates** an update to the AFH to be adopted in 2022. Additionally, the Inventory of Sites suitable for housing development **must** be identified throughout the City in a manner that affirmatively **further**s fair housing opportunities.

***Define "further", "fair" and "fair housing" and provide quantification and numerical terms throughout the DEIR.***

***Provide editorial and legal consistency with regard to the use of "shall", "must", and general active verb uses ("anticipates" vs "must anticipate").***

4/3 For purposes of the **housing element site inventory**, this means that sites identified to accommodate the lower-income portion of the RHNA **are not concentrated** in **low-resourced areas** (lack of access to high performing schools, **proximity to jobs**, location disproportionately exposed to pollution or other health impacts) or areas of segregation and



concentrations of poverty. **Sites** identified to accommodate the lower income RHNA **must be distributed** throughout the community in a manner that affirmatively **further**s fair housing.

***Provide editorial and legal consistency with regard to the use of “shall”, “must”, and general active verb uses.***

***Provide and consistently apply a numerical/computerized model/program for more evenly distributing/de-concentrating lower income portions.***

***Provide definitions and numerical criteria and conditions with regard to affirmatively, furthers, and fair housing.***

***Provide methodology for relating “low resourced” and “proximity to jobs” for both car- and transit-dependent/served communities (e.g., >20 households).***

***Provide definitions and distinctions for “housing element site inventory” and “Housing Element” “Inventory of Sites” and apply throughout the Project.***

***Provide tables, maps, and numerical model/program linked to ZIMAS for Low-, Moderate-, and High-Resources Areas in all of Los Angeles City.***

5/1 Additional Requirements Related to the Inventory of Sites (AB 1397 and SB 166) Since the 5th cycle Housing Element was adopted in 2013, the State Legislature has adopted **several bills** which **strengthened** requirements related to the **Inventory of Sites**.

***Provide listing/summaries of the several bills, specific methods of “strengthening”, and specific requirements for the IOS.***

5/2 Assembly Bill 1397 requires that, for **each site included in the inventory**, the City identify the **realistic development potential** for the site within the eight-year planning period. For nonvacant sites, the methodology used to identify **realistic development potential must consider factors** such as existing uses, past development trends, **market conditions**, and the **availability of regulatory** and/or other **development incentives**.

***Provide all development potentials of all sites, both realistic and unrealistic as currently know, and apply throughout the Project, and incorporate into a numerical computerized model/program for annual updating.***

***Provide a thorough documented market conditions review and assessment for all areas and sites within the IOS and incorporate sales and values as provided in ZIMAS.***

***Provide a thorough documented regulatory incentives review and assessment for all areas and sites within the IOS and incorporate any incentives as provided in ZIMAS.***

***Provide a thorough documented development incentives review and assessment for all areas and sites within the IOS and incorporate any incentives as provided in ZIMAS.***

6/4 A jurisdiction **must add additional sites** to its inventory if land use decisions or development results in a shortfall of sufficient sites to accommodate its **remaining housing need for each income category**. In particular, a jurisdiction **may be required** to identify additional sites according to the **No Net Loss Law** if a jurisdiction rezones a site or if the jurisdiction approves a project at a different income level or lower density than shown in the **sites inventory**. Lower density means fewer units than the capacity assumed in the **site inventory**.

Provide

***Provide legal citation for no net loss “law”.***

***Provide editorial and legal consistency with regard to the use of “shall”, “must”, and general active verb uses.***

***Provide numerical/computerized model/program to assign all housing needs to the City based on the IOS, occupied/vacant units/parcel for each income category, potential sites, and income categories and to be developed to annually review and reassign as sufficient for all income levels, (e.g., Extremely low, low, moderately low, low moderate, mid moderate, upper moderate, and high/above).***

6/5 To ensure that **sufficient capacity** exists in the housing element to **accommodate** the RHNA throughout the planning period, HCD recommends that jurisdiction create a **buffer** in the **housing element inventory** of at least 15 to 30 percent more capacity than required, especially for capacity to **accommodate** the lower income RHNA. Jurisdictions can also create a **buffer** by projecting site capacity at less than the maximum density to allow for some reductions in density at a project level.

***Provide editorial and legal consistency with regard to the use of “sufficient”, “accommodate”, and general active verb uses.***

***Provide numerical/computerized model/program to assign all housing needs and suitable numerical buffer (i.e.,30%) to the City based on the IOS, occupied/vacant units/parcel for each income category, potential sites, and income categories and to be developed to annually review and reassign as sufficient for all income levels, (e.g., Extremely low, low, moderately low, low moderate, mid moderate, upper moderate, and high/above).***

***Provide numerical/computerized model/program to assign all housing needs and suitable numerical buffer by lowering the expected density by 30% (i.e.,30%) to the City based on the IOS and to be annually reviewed and reassignments made to be sufficient for all income levels, (e.g., Extremely low, low, moderately low, low moderate, mid moderate, upper moderate, and high/above).***

7/3 Government Code Section 65583.2(g)(3) **now requires** that the **Housing Element** include a program to **impose housing replacement requirements** on **certain sites** identified in the **Inventory of Sites**. These replacement requirements **would require** the replacement of units affordable to the **same or lower income level** as a condition of any development on a nonvacant site consistent with those requirements set forth in State Density Bonus Law (Government Code Section 65915(c)(3).)

***Define “now” and provide consistent temporal reference usage throughout the DEIR.***

***Provide clarifications as to “impose”, “certain sites”***

***Clarify as to “would require” vs “shall/must require” and same or lower income levels (e.g., +/- \$100/month), and provide consistent usage throughout the DEIR and MM&RP.***

7/4 The housing replacement requirements **would be required** for **sites identified in the Inventory of Sites** that currently have residential uses, or within the past five years<sup>1</sup> have had residential uses that have been **vacated or demolished,....**

***Provide in the IOS sufficient site and density buffers and designate such as “potential sites”.***

***Provide computerized/numerical models/programs to review and update ZIMAS and other DCP-DB&S systems on an annual basis and provide for adjustments on a fiscal year basis adjustments to the IOS.***

7/5 If, after completing the **Inventory of Sites**, the City concludes that there is a shortfall of sites to accommodate the RHNA allocation, then the Housing Element **must** include a program to **identify sites that can be rezoned during the planning period**. For any shortfall of sites to accommodate the lower-income RHNA, the Housing Element **is required** to include an...8/1...**inventory of potential sites** for rezoning, and those sites must meet the adequate sites requirements in terms of suitability and availability.

***Provide administrative definitions and differences of “must” and “is required”.***

***Provide a table and map of all IOS, “Rezoned” IOSs, and “Potential IOSs”.***

***Provide a numerical and digital/computer model/program for adjusting for “shortfalls” and overly concentration Low, Moderate, and High Income Housing sites and those for reconstruction in each.***

***Define and use consistently throughout the Upgrade/Project Report and DEIR “adequate sites requirements”, “suitability”, and “availability”.***

8/1 **Recent changes** to State law added a requirement that **existing** housing need **must be incorporated** in the **regional determination** by considering housing need indicators such as vacancy rates, jobs/housing balance, **cost burden**, and overcrowding.

***Provide summaries/listings of State law and City ordinances related to housing for the 5<sup>th</sup> and now 6<sup>th</sup> cycle of Housing Element Updates.***

***Provide SCAG projections and methods/outcomes of assignments with regard to LA City population, housing, households, job, and transportation for all LA City TAZs for 2029, 2035, and 2045.***

***Provide numerical, computerized model/program for such conditions which can be applied annually as part of the Mitigation, Monitoring AND Reporting Program for the Project planning, rezoning, and progress through 2029.***

8/3 The **requirements** to identify an **inventory of sites** for rezoning within the Housing Element **Programs do not apply to rezonings** that may be required to accommodate a Moderate Income or Above Moderate Income RHNA shortfall. Following the adoption of the Housing Element, **jurisdictions** have three years to adopt the rezonings, with some ability for extensions based on specific criteria. For the City of Los Angeles, these rezonings must be completed and adopted by October 2024, but **specific sites do not need to be identified in the Housing Element.**

***Provide requirements and numerical computerized models/programs along with one-plus demonstration application for identification of current and 2029 high (=above moderate), moderate, and low income Project areas and sites with appropriate tables, graphics, and maps.***

***Provide the basis for distinguishing low vs moderate and high income areas with regard to rezoning and housing, especially as they reflect issues of Environmental Justice.***

***Provide clear designation of “jurisdiction”, here assuming City of Los Angeles, Port of LA, and LAWA, and LACounty and California State facilities are separate.***

8/4 Several recent state laws require the City to make updates to other sections of the General Plan alongside the update to the Housing Element. **These laws place a particular emphasis on the Safety Element, with an expanded focus on planning for flooding, wildfires, and climate change impacts. More detail** on updates to the Safety Element is described in **Description of Safety Element Update**. Additionally, SB 1000 expands requirements surrounding Environmental Justice. Many of these requirements are met through LA’s existing Environmental Justice Element, the Plan for a Healthy LA, but minor amendments may be necessary to ensure full compliance.

***Provide maps and tables for Project Areas and Sites that are affected in any way – three levels: low moderate and high by “these”/“several” laws***

***Provide an adequate (more than 13 lines of text) and complete description of the Safety Element Update appropriate to the increased population and household, environmental justice, and safety issues.***

***Given LAFD has indicated need for survival of upto 14 days following an earthquake, Provide facilities and infrastructure for such and for a significant transit dependent population and others to evacuate rather than shelter in place for the extended 14 days compared to an earlier 3 days period.***

***Designate and provide evacuation routes suitable for vehicles, including buses, to pass over the LA River and cross over/under I-5, I-110, I-710, and I-605.***

9/3 SCAG is responsible for preparing the **RHNA allocation methodology**,... (1.34 million housing units) among **all SCAG jurisdictions** based on the **need for housing** within each jurisdiction during specified planning periods, as well as other statutory requirements. The main factors included in the allocation methodology are **household growth** (based on the Connect SoCal, or SCAG Regional Transportation Plan/Sustainable Communities Strategy [RTP/SCS] growth forecast), job accessibility, transit accessibility, and socioeconomic conditions. The current RHNA projection period covers an eight-year period from October 2021 to October 2029.

***SCAG projects population, households, and jobs for the SCAG areas, including the City/Housing Element and housing units based on households. Within the City, such allocations are commonly based on SCAG's Transportation Analysis Zones (TAZs). Provide the TAZs for all Housing Element areas and sites.***

***Provide the projections for 2029 and 2045 by Project areas for populations, households, and jobs.***

***Provide a numeric and computerized model within the City for such SCAG data and compare with SCAG/SCAQMD transportation models as at least three levels of vehicular and transit uses and designation of Transit Corridors and comparisons with currently designated "transit dependent communities"***

***Provide City map of all Project areas where >100 lots have remained undeveloped during the last three update cycles.***

***For the same periods and Project areas, provide comparison of housing and households to demonstrate use and results of projections and Project occupancies during 2000-2020.***

***Provide projections for 2021-2029 by Project areas and sites of any anticipated shortfalls based on the Project as proposed.***

43/2 The Final 2016 AQMP addresses several State and federal planning requirements and incorporates new scientific information, primarily in the form of updated emissions inventories, ambient measurements, and meteorological air quality **models**. The **SCAG's projections for socio-economic data** (e.g., population, housing, employment by industry) and transportation activities from the 2016 RTP/SCS are integrated into the 2016 AQMP.

***Provide a by Plan Update period a numerical review for all TAZs in the City and especially review balancing of population and jobs within the same TAZs for impacts of traffic on the AQMP.***

10/3 To ensure that sufficient capacity exists in the housing element to accommodate the RHNA throughout the planning period, HCD recommends that jurisdictions **identify a buffer of between 15-30 percent over the required allocation**, particularly for the lower-income allocation, for the purposes of creating the **inventory of sites**.

***Provide annual records for 5<sup>th</sup> Update of any use of buffers and consistency of population/jobs by TAZ. Identify population/housing projections, achievements, and use of buffers annually from 2012 to date.***

## 11/2 Description of the **Housing Element Update**

### Summary of Housing Element Update

Most components of the Housing Element are incorporated...update to the following six components of the Housing Element...Assessment... 2. Constraints on **Housing Maintenance, Improvement, and Development** - Identifies and addresses regulations and conditions that constitute constraints to...infrastructure requirements and **market conditions** such as **land, construction and labor costs** as well as **restricted financing availability**....

***Provide thorough and complete annual review of "Market Conditions", "Land, Construction, and Labor Costs" (including Administration, Construction, Operations, and Maintenance) and "Financing Availability" for the 5<sup>th</sup> Update and that for this current 2021-29 Update.***

***Provide numerical computer model/program for annual review for 2021-29.***

12/1 See **additional assumptions** in Description of the Housing Element Update regarding the **Inventory of Sites and Rezoning Program**.

12/-6.a a. Accommodate the **RHNA** through the **Sites Inventory** and applicable **rezoning program**.

**Revise and provide adequate editing for DEIR to avoid IOS vs Sites Inventory and Rezoning Program vs “applicable rezoning program and provide definitions of such in a DEIR glossary..**

**Provide table of all “assumptions” made in the project development and designations of sites,**

**Provide table of linkages between IOS and Rezoning Program.**

**Provide table and illustration regarding current zoning, new zoning codes for previously zoning for all sites in the IOS.**

**More to be submitted on 021621, as 021521 is a national holiday and request for continuance had been rejected**

40/2 As discussed under impact discussions...the City of Los Angeles is urbanized, but **does include zones for agricultural use and open space** that can support native tree cover. In addition, the City **contains land designated as Prime Farmland and Unique Farmland.....** While it is possible that individual housing project sites would be located in any area where the zoning permits residential uses, such as single-family or ADU development on agricultural zones, it is **reasonable to assume** that the geographic distribution of project development would **largely** be consistent with that of **recent building permit activity and areas of the City that are currently zoned for multi-family and commercial development.** Therefore, such development is **not likely or anticipated on a level that would significantly conflict with the sites’ use as agricultural land.** The proposed project would not involve other changes in the existing environment which could result in the conversion of Farmland to non-agricultural use or the conversion of forest land to non-forest use. There would be a less than significant impact.

**As the Housing Element also includes appropriate rezoning for the Update, provide maps and tables for any areas which cannot be rezoned and those areas to be rezoned as part of the Housing Element Update, 2021-29. Provide glossary and numerical/quantified values for “Largely” and other such references and qualifiers.**

**Provide a map and table for numbers and sizes of parcel designated currently as prime/not-prime and Unique/Not-Unique farmland or agricultural and as open space and provide evaluation as to whether surroundings are developed for residential and commercial uses (>25/50/75% of perimeter or less).**

**Provide annual estimates of agricultural production (excluding any livestock grazing) for parcels above exceeding 100,000 sqft in area).**

**Provide specific requirements and constraints for rezoning any agriculture/farmland/open space parcels of more than 45,000sqft.**

57/5 Alternatives

Mitigation measures pursuant to CEQA may, **as an alternative**, include **participation in an NCCP in order to reduce the burden for on-site mitigation.**

**The NOP and IS do not provide even the “do nothing” alternative as format for public comment alternatives. Provide at least one “typical alternative description” and all parameters required for consideration within 60 days of Monday February 15<sup>th</sup>, 2021 (a national holiday) and coincident submittal date for Scoping Comments.**

**Provide draft Mitigation Monitoring and Reporting Program within the Draft Housing, Rezoning, and Safety DEIR with then current Lead agencies for mitigation, monitoring, AND reporting compliant with 18.04.030 Mitigation monitoring and reporting program compliance requirement.**

**Provide a Mitigative Alternative including complete development and services/infrastructure funding, contracting, and operations along with Occupancy Permits for ALL R1 and R2 equivalent parcels within the City by decade of their zoning/rezoning to such (e.g., 1930, -40, -50, -60, -70, -80, 1990, 2000, and 2010). Require such before any rezoning of existing zoning is undertaken or proposed for this Update.**

58/1 HCPs require a “take permit” when a project will affect a species identified as listed, non-listed or eligible under the act and **detail how those impacts will be minimized or mitigated**; and **how the HCP is to be funded** (USFWS 2020). No HCPs or NCCPs apply to the City (City of Los Angeles 2015a). Therefore, no impact would occur.

66/4 On April 8, 2015, ...released the Sustainable City pLAn, which covers a multitude of environmental, social, and **economic sustainability** issues related to GHG emissions reductions, either specifically or by association.... In 2019, the City prepared the L.A. Green New Deal/2019 Sustainability Plan, which provides an expanded vision of the Sustainable City pLAn, focusing on **securing clean air and water** and a **stable climate**, improving **community resilience**, expanding access to healthy food and open space, and promoting **environmental justice** for all.

***Provide details on ALL sector/element impacts as to how they will be minimized, mitigated, and/or compensated and provide a detailed MM&RP as to funding and sustainability for 2021-29.***

***Provide numerical levels for “clean air”, “clean water”, and “stable climate”.***

***Provide definitions for the above and for community resilience and environmental justice along with other quantitative/numerical values.***

***Provide assessment of economic/market conditions for housing through 2021-2029.***

60/2 In addition, if it can be demonstrated that a project would cause damage to a unique archaeological resource, CEQA recommends that the **lead agency require reasonable efforts be made to permit any or all of these resources to be preserved in place or left in an undisturbed state** to avoid a significant impact. To the extent that resources cannot be left undisturbed, **additional or alternative mitigation measures should be required** (PRC, Section 21083.2[a], [b]).

***Clearly define and provide such for “reasonable”, “undisturbed”, and “mitigation measures” (and their dedicated funding) specifically in the draft Mitigation, Monitoring, AND Reporting Plan within the DEIR.***

***Provide draft Mitigation Monitoring and Reporting Program within the Draft EIR for the Housing and Safety DEIR with then current Lead agencies for mitigation, monitoring, AND reporting compliant with 18.04.030 Mitigation monitoring and reporting program compliance requirement.***

***Provide at least a five-part assessment of probability/risk of encountering archaeological remains (None-Very Low, very-low to low, moderate, highly probable, and known resources) for square-mile areas based on state coordinates. Provide mitigation and monitoring measures for each category and provide risk assessment and mitigation measures for the IOS.***

65/4 In addition, the Housing Element Update would prioritize developing new housing units in **close proximity to high quality transit areas and existing commercial/retail, recreational, and institutional land uses**, which would **reduce trip distances and encourage the use of alternative modes of transportation** such as bicycling and walking. These factors would **minimize the potential** of the **proposed project** to result in the wasteful or unnecessary...

***Provide a numerical, computerized model for all housing units with 100ft intervals distance intervals from Low/Moderate/High quality transit-commercial-public facilities-open spaces.***

***Provide numerical, computerized model for demonstrating reduction of “trip” and “walking” distances and increased/reduced trip distances for the Inventory of Sites, by mapped areas.***

***Define and differentiate “proposed project” vs “Proposed Project” and use consistently.***

***Define “minimize the potential” and convert to numerical assessments.***

66/3 In addition, LADWP will continue to implement programs to emphasize water conservation and pursue procurements of **alternative local water supplies**, including recycled water and storm water capture, which would reduce energy consumed by treating and transporting water.

***Provide current and planned and prospective local water supplies and expected/probable Sites and Areas which would be served.***

***Provide listing and tables with maps of such and provide energy requirements for lifting treated water from Hyperion to supply above 300ft elevations.***

**72/1** RCM-GEO-7 (Low Impact Development): Developments **are required to comply** with the applicable provisions of the City's Low Impact Development (LID) Ordinance...and LID Handbook for the purpose of improving water quality by minimizing urban runoff and soil erosion.

***Provide use of "shall" or "must", define "are required" vs "shall require".***

***Provide requirements of collection, conveyance, storage, and reuse for irrigation and/or recharge for a 3/4inch rainfall in 24hr.***

***Provide as mitigation LID conditions on all impervious surface non-structure site areas of more than 400sqft.***

***Provide a map and tables of all Project sites which may require >1000gal<10,000 and greater than 10,000gal capacities.***

**72/2** The City is located in a **seismically active** region of southern California. Major active faults in the area include the San Andreas, Whittier-Elsinore, Newport-Inglewood, Hollywood, and Raymond Fault zones. **In addition to these known faults, movement along buried blind thrust faults that have no obvious surface features can also occur, such as during the Northridge earthquake (City of Los Angeles 1996).**

***Provide specific ZIMAS/DCP database surface fault zones for many named faults in addition to those designated by the State and further indicates surface locations at meter accuracy along with estimated length/widths/depths of blind faults and their expected magnitudes.***

***Provide prohibitions as mitigations of proposed housing development in reported fault zones within the City, along with specific coordination with ZIMAS conditions.***

***Related and included in ZIMAS, provide reported risks of liquefaction and landslide and exclude all such zones, including surface fault zones from future development and inclusion in projections without special seismic/geotechnical studies and designs to recognize/control/mitigate risks of seismic and land stability risks realized.***

**72/2** A May 8, 2020 analysis by the United States Geological Survey (USGS) in which multiple seismic datasets and **models** strongly...73/1...suggest **active, near-surface fault traces** of the Hollywood Fault not previously mapped by the DOC's...Earthquake Fault Zone Map. Therefore, **project** development could occur in areas with the **potential for fault rupture and seismic ground shaking**, and associated risk of loss, injury, or death; however, **potential projects would not involve mining operations that require deep excavations thousands of feet into the earth, or boring of large areas that could create unstable seismic conditions or stresses in the Earth's crust.** As such, the **proposed project** would not directly or indirectly cause or increase potential substantial adverse effects involving the rupture of a known earthquake fault or strong seismic ground shaking.

***Provide consistent use of project or projects AND Project or the Projects (when referencing Safety and Rezoning elements of The Project.***

***Provide seismic models for all designated ZIMAS surface fault zone and provide suitable mitigation and compensation for all Project sites within such zones***

***As indicated by ZIMAS and the Initial Study, provide revised statement, this is incorrect, and revisions, provide in the DEIR a complete review and revision and maps/tables with ZIMAS links with appropriate***

**mitigations to reflect all ZIMAS identified faults and rated seismic forces related thereto and stated in the official database.**

**Remove references to mining, deep excavations, and borings, or provide all known wells, gas storage facilities, and MTA Transit Tunnels and stations and suitable restrictions, constraints, and risks assessments for such nearby or surface Project site.**

**Provide maps of all surface fault zones recorded in ZIMAS and require any Project parcel to be specifically related to the surface fault zones, liquefaction zones, and landslide zones and specific mitigation measures to eliminate such risks from Project structures in the future.**

73/2 However, before a project can be permitted within a mapped Alquist-Priolo Earthquake Fault Zone, the City requires completion of a geologic investigation that demonstrates proposed buildings for human occupancy would not be **constructed on or within 50 feet of an active fault trace**. Future project development would also be subject to RCM-GEO-1 through RCM-GEO-6, as well as federal, State, and **local regulations** in place for the purpose of mitigating seismic risks.

Less than Significant with Mitigation Incorporated No identification of impacts

**Provide ZIMAS based maps of all surface fault zones recorded on ZIMAS and related databases (SCEC has several) and all listed landslide and liquefaction parcels also within ZIMAS and provide specific local regulations to render any risks equivalent to similar parcels without such designations within 250ft of the identified parcel(s).**

74/2 The required geotechnical investigation **must** assess potential consequences of any liquefaction and soil strength loss, estimation of settlement, lateral movement or reduction in foundation soil-bearing capacity and discuss mitigation measures that may include building design consideration. Building design considerations **shall** include, but are not limited to: ground stabilization, selection of appropriate foundation type and depths, selection of appropriate structural systems to accommodate anticipated displacements, or any combination of these measures. Compliance with City and State building codes **would reduce** seismic ground shaking impacts with current engineering practices **and** the project **would not** exacerbate liquefaction potential in the area. As such, the proposed project **would not** directly or indirectly cause substantial adverse effects from liquefaction risk and impacts would be less than significant.

**Provide clear definitions/differentiations for use of Must, Shall, active verbs, and conditional verbs and use consistently throughout all Project texts (Plan and DEIR).**

**Require as mitigation all Project sites to have such investigations throughout the City, Project areas, and Project Sites and provide maps and tables to assign such for the Project.**

**Provide such mitigation also for sites with LID recharge of storm water and potential impacts on liquefaction and landslide potentials.**

75/2 The BMPs **would be** in accordance with the provisions contained in the "Planning and Land Development Handbook For Low Impact Development (LID), Part B Planning Activities" and would be designed to capture and treat runoff from **construction sites** such as through stabilization of construction entrance roadways and on-site retention of eroded sediments and pollutants. In addition, **projects** would be subject to the regulations..., which include requirements to **minimize potential adverse impacts** associated with water quality and soil erosion.

**Provide "Must" rather than "Would Be" for compliance in accordance with the LID program for all construction and operations of Project facilities on all Project Sites. Provide requirements for full use of captured/treated storm water for irrigation and groundwater recharge for all Project Sites and provide tables/maps to demonstrate such compliance and measures for all sites and facilities within the Inventory of (Project) Sites.**

77/2 e. Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater? The Los Angeles Bureau of Sanitation (LASAN) operates and maintains the City's wastewater infrastructure....Over 6,700 miles of public sewers connect to the City's four wastewater treatment and water reclamation plants, which have a combined capacity to treat an average of 580 million gallons per day (mgd) of wastewater.... The **Housing Element Update would emphasize** the development



of **additional housing units in urban infill sites** which would be served by **existing LASAN infrastructure**. Project development would not use septic systems. Therefore, there would be no impact related to the use of septic tanks or alternative wastewater disposal systems.

***Provide tables and maps of all existing vacant and occupied parcels without street sewers, storm drains, and water supply/hydrants within the City and include dates of parcellation, permits to occupy and other such information based on the last 18 years 2002-2021 (4 year intervals) and projected for the next 8.***

***Provide tables and maps of all existing vacant and occupied parcels with street sewers, storm drains, and water supply/hydrants within the City and percent of design capacity used by year, and include dates of parcellation, permits to occupy and other such information based on the last 18 years 2002-2021 (4 year intervals) and projected for the next 8.***

91/1 **LID** ♣ RCM-WQ-3 (LID Plan): Prior to issuance of grading permits, the Applicant is required to submit a **LID Plan** and/or Standard Urban Stormwater Mitigation Plan to the City of Los Angeles Bureau of Sanitation Watershed Protection Division for review and approval. The Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan shall be prepared consistent with the requirements of the Development Best Management Practices Handbook

***Provide such for all construction and operations on all identified Project Sites throughout the City.***

***Provide requirements for full use of captured/treated storm water for irrigation and groundwater recharge for all Project Sites and provide tables/maps to demonstrate such compliance and measures for construction and operations of all sites and facilities within the Inventory of (Project) Sites.***

92/2 The Housing Element Update **would encourage new residential development on infill sites within urban areas of the City**. Construction of project development could potentially impact surface or ground water quality due to erosion resulting from exposed soils and the generation of water pollutants, including trash, construction materials, and equipment fluids...., **requires** owners or developers to implement stormwater pollution control requirements for construction activities depicted in the project plans, which are subject to approval by the Department of Building and Safety; the Director of the Department **may** require additional and/or alternative site-specific BMPs or conditions, if needed.

***Provide definitions and require use of “shall” or “must”, define “encourage” vs “shall require” and do not use “may” without full explanation of conditions required for discretionary decisions.***

***Provide definitions and capacities in tables and maps for all “infill areas” for storm water runoff, collection, and conveyance, provide estimates in tables and maps as to drainage from construction during the last 16 years and proposed for 2021-2029, provide current and expected Low Impact Development measures and changes in capacities due to such within the City for next eight years.***

100/2 Upon its adoption by the City, the Housing Element Update **would serve** as a comprehensive statement of the City's housing policies and as a specific guide for program actions to be taken in support of those policies. The Housing Element Update is a **policy document that encourages housing opportunities** in infill areas. As discussed under Description of Housing Element Update, Under Housing Element law, the City **must** show that it has adequate land zoned to accommodate the entirety of its 2021-2029 RHNA allocation of 455,577 units under the Housing Element Law. Of these units, a total of 184,273 units **must** accommodate the City's lower-income RHNA, which means they **must** be identified on multi-family-zoned sites that have a minimum density of 30 du/acre, or in the R3 or a less restrictive zone. Recent changes to **state** Housing Element law have strengthened housing replacement requirements related to the Inventory of Sites. For example, the Inventory of Sites **must** demonstrate compliance with AB 686 by incorporating an analysis of how the sites are consistent with AFFH goals. For non-vacant sites, the methodology used to identify realistic development potential **must** consider factors such as existing uses, past development trends, market conditions, and the availability of regulatory and/or other development incentives.

***Provide clear definitions/differentiations for use of Must, Shall, active verbs, and conditional verbs and use consistently throughout all Project texts (Plan and DEIR).***

***Provide do not use “may” without full explanation of conditions required for discretionary decisions.***

***As the Housing Element shall include appropriate rezoning, the Project ceases to be just a policy document/plan which the Director of City Planning, Zoning Administrators, or Planning Commissioner may change as they so choose, as mitigation/compensation for some significant impact of the Project.***

**Provide equivalency protection for all sites within the Inventory of Sites and status of Specific Plan, as in the Cornfields Arroyo Seco Specific Plan.**

**Require as mitigation all Project sites to have such investigations throughout the City, Project areas, and Project Sites and provide maps and tables to assign such for the Project.**

107/Tab.14 Would the project: a. **Induce** substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or **indirectly (e.g., through extension of roads or other infrastructure)**?

**Provide definitions and differentiate quantitatively between Project and other urban inducements, substantial and non-substantial.**

**Provide maps and tables for currently and Project related undeveloped but plotted parcels where infrastructure (e.g., street pavement, gutters, storm drain inlets and pipes, and sanitary sewers and manholes) is emplaced and where not (e.g., paper streets or even paved but not curbed).**

108/2 a. Would the project **induce substantial unplanned** population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (**for example, through extension of roads or other infrastructure**)?

**Define and differentiate quantitatively between Project and other urban inducements, substantial and non-substantial, and planned/unplanned growth, equals growth inducement.**

**Provide expected and possible unexpected growth beyond the Project's Sites.**

**Provide maps and tables for currently and Project related undeveloped but plotted parcels where infrastructure (e.g., street pavement, gutters, storm drain inlets and pipes, and sanitary sewers and manholes) is emplaced and where not (e.g., paper streets or even paved but not curbed).**

108/2 The Housing Element Update would emphasize the creation of new housing units **within urban infill areas** of the City, which would increase development density throughout the City...., project development involves the **potential construction and operation** of between 419,261 and 429,261 housing units to meet the City's RHNA, which is determined by SCAG to quantify the **need for housing within each jurisdiction** based on anticipated growth...As such, the Housing Element Update would relieve overcrowding and **existing cost burden**, while also providing housing for the existing unsheltered and unhoused population. However, the project does have the **potential to result in additional population growth beyond that forecasted by SCAG**. Therefore, impacts related to direct population growth associated with the Housing Element Update will be further analyzed in an EIR....

**Provide definitions, tables, and maps of housing existing "cost burden".**

**Provide a construction/operations economic model for the Project areas and individual sites with more than 10 units within the City.**

**Provide definitions, tables, and maps of potential and anticipated population and housing by TAZs equivalents for the additional growth beyond SCAG projections.**

114/2 Project development can affect the **need for new or physically altered recreational facilities when residential dwelling units are constructed and demand increases beyond existing capacity.**

**Provide current resources and demands and those projected for all public urban services (e.g., fire, EMT, police, and education) and for infrastructure (e.g., roads, parking, street trees, stormdrains and discharges, sewers and STPlants, water supplies, power (gas and electricity), communications, etc.).**

**Provide a City Map for all Project sites and identify those sites with and without adequate City's recreational facilities and open spaces and provide tables of 2020, existing and 2029 capacities.**

114/2 All future project development **would be required** to comply with the regulations described in RCMs-PS-2 (Increased Demand for Parks or Recreational Facilities) and RCMPS-3 (Increase Demand for Parks or Recreational Facilities – Zone Change), which state that developers of individual development projects, with the exception of ADUs, **would be required to pay park mitigation fees** (for non-subdivision projects) or **dedicate land or pay Quimby in-lieu fees** (for subdivision projects) **to mitigate for the increased demand** placed on parks and recreational facilities.

***Other sections of the NOP use must or shall for such compliance. Provide the basis of verb choice whenever using the conditional verbs for compliance. Provide a table of all compliance regulations and their degree of certainty. For Quimby funds, provide for annual accounting for all such funds, including their interests and require clearing of such within one year of deposit and for such expenditures to be allocated for projects within 5000ft of the project providing such fees.***

***Provide current compliance and adequacy for current and project indoor/outdoor recreational services demands.***

114/2 For example, these parks would be located on urban infill lots lacking biological or cultural resources; generate minimal vehicle traffic to the site which would limit air quality, GHG emissions, noise, and transportation **impacts; and be** able to accommodate a limited number of people due to their small size, which would reduce park noise levels. **Existing regulations and General Plan policies would provide funding for the provision of new recreational facilities necessitated under the Housing Element Update.** Although project development increase demand for additional recreational facilities, the lack of available space for new parks in the City would limit overall construction or alteration of parks and recreational facilities such that associated environmental impacts would be less than significant. Nonetheless, potential impacts of the Housing Element Update, such as placing an **unanticipated burden on park services**, such that new or expanded park facilities would be needed, will be further analyzed in an EIR.

***Provide adequate text editorial review and revisions.***

***Provide comparisons of 2012-21 and proposed 2021-29 plans for services and infrastructure and funding related to such from 2012-2029 and their adequacy.***

***Provide 2012-2029 adequacies and funding and those for all parcels rezone for development before 2012 but as yet not developed nor provided with services and infrastructure facilities and systems.***

124/1 It further states that the **lead agency** shall establish measures to avoid impacts that would alter the significant characteristics of a tribal cultural resource, **when feasible** (PRC Section 21084.3).

***Provide definitions, designations, and requirements for the “Lead Agency” and all enforcement agencies under the lead agency for achieving reduced and mitigated Project impacts.***

***Provide a draft Mitigation Monitoring AND Reporting Plan/Program.***

---

**Housing Element** <housingelement@lacity.org>

To: Tom Williams <[REDACTED]>

Cc: "cally.hardy@lacity.org" <cally.hardy@lacity.org>, Matt Glesne <matthew.glesne@lacity.org>

Tue, Feb 16, 2021 at 10:43 AM

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

2/16/2021

City of Los Angeles Mail - Re: Housing Element Public Comments Initial Study 2021 #4

[Quoted text hidden]



Housing Element <housingelement@lacity.org>

## Re: Housing Element Public Comments Initial Study 2021 #5

2 messages

**Tom Williams** [REDACTED] Mon, Feb 15, 2021 at 4:42 PM  
 To: "housingelement@lacity.org" <housingelement@lacity.org>, "cally.hardy@lacity.org" <cally.hardy@lacity.org>  
 Cc: Matt Glesne <matthew.glesne@lacity.org>

DATE: 021521

TO: City of Los Angeles, Department of City Planning ATTN: Cally Hardy, City Planning Associate

[200 N. Spring Street, Room 750, Los Angeles, CA 90012](#) Phone: (213) 978-1643

E-mail: [housingelement@lacity.org](mailto:housingelement@lacity.org) &

SUBJECT: NOP/Initial Study and Scoping Comments for Housing Element Draft EIR

Case Numbers: CPC-2020-1365-GPA; ENV-2020-6762-EIR OPR/SCH-2021010130

RE: Request for Extension of Comment Review Period until Monday March 1, 2021 and Other Comments for NOP/IS #5

FROM: name: Dr Clyde Thomas Williams, Retired 1972-2012 environmental consultant for CEQA and NEPA worldwide

telephone: 323-528-9682 contact information [REDACTED] LA-32 NC Director [4117 Barrett Rd. LA, 90032-1712](#)

COMMENTS: I find, in general, that the Initial Study sections are inadequate and incomplete and not worthy of public review and consideration.

Placing the Comments Deadline on a national holiday for which City offices are closed and staff are on Long Weekend Holiday leave places the Public at a disadvantage which is usually address by postponing the submission deadline until the next operating workday ...February 16, 2021. Additional comments shall be submitted on 021621 and if not included in DEIR shall be grounds for appeal for the entire CEQA process.

As indicated in previous comment submittals and those to follow, the current NOP and IS are totally inadequate for review and meaningful comments and I again request an extension of two weeks to March 1, 2021.

### CONTENTS

Numerical designation 3/5 indicates the Notice of Preparation page/paragraph for each comment. Provide requires that the DEIR include the requested provision.

13/1 include a program to comply with new housing replacement requirements for the Inventory of Sites (Government Code Section 65583.2(g)(3)).

***Provide a numerical/quantitative computer model/program to integrate/use/review all ZIMAS data base files regarding all residential development during the 5<sup>th</sup> HE Update, current 20-21-29 efforts and for annually***

***reviewing/monitoring/reporting housing status and development.***

***Provide thorough glossary of all housing, population, construction, and other terms with numerical scales and assigned numerical values for each parcel.***

13/2 In addition, the Housing Element will include a **summary of historic housing and land use practices** in the City, as well as a study of **historical land use patterns**.

***Provide numerical/quantified parameters linked with ZIMAS database values/parameters within a computerize program/model for all Housing Element updates (1<sup>st</sup> through 6<sup>th</sup>) and provide for annual review and updates for 2021-29.***

***Provide historic land use patterns which are related to isolation of 3-part income concentrations, ethnically distinctiveness, and resources, including home/unit-ownership and City resources.***

13/3 **Inventory of Sites Background** Under Housing Element law, the City must show that it has **adequate land zoned to accommodate the entirety** of its 2021-2029 RHNA allocation of 455,577 units. Of these units, a total of 184,273 units must accommodate the City's lower-income RHNA, which means they must be identified on **multi-family-zoned sites** that have a minimum density of 30 du/acre, or in the **R3 or a less restrictive zone**. In addition, the **Inventory of Sites** must demonstrate compliance with AB 686 by incorporating an **analysis of how the sites** are consistent with AFFH goals.

***Provide definitions and distinctions of multi-family zoned sites and those zoned for R2 and R3.***

***Provide a numerical, quantitative computerized data base linked directly to ZIMAS parcels and how these are specifically consistent of numerical AFFH goals and requirements.***

***Provide numerical estimates as to current/expected monthly rent payments as a percentage of monthly incomes for tenants consistent of numerical AFFH goals and requirements and provide for annual updates for 2021-29.***

***Provide for annual updates of such with construction and occupancy permits for 2021-29.***

13/4 As stated above, the City is anticipating the need to identify **some buffer in the Inventory of Sites**. The City intends to identify a total capacity of 501,642 units. Of these, the City anticipates identifying 230,338 lower income units **on sites that have a minimum density of 30 du/ac**.

***Provide tables and maps of all "buffer unit sites" within the IOS.***

***Provide tables and maps of all "buffer unit sites" within the IOS at densities of <30, 31-45, and 46-50+ units/acre within the City and the IOS.***

13/5 Recent changes to state Housing Element law have strengthened requirements related to the **Inventory of Sites**. In particular, AB 1397 (2017) requires that, for each site included in the inventory, the City identify the **realistic development potential** for the site within the eight-year planning period. For non-vacant sites, the methodology used to identify **realistic development potential** must consider factors such as **existing uses, past development trends, market conditions**, and the **availability of regulatory and/or other development incentives**.

***Provide the State Laws and their referenced changes, presumably during 5<sup>th</sup> Update and provide numerical/quantified parameters related thereto and incorporate into a land use/units/parcel program interlinked to ZIMAS.***

***Provide a "realistic development potentials" and a list of "unrealistic potentials" related to market conditions and regulatory and development incentives with appropriate numerical/quantified parameters that are integrated with the land use computerize program/model supporting the Project, including zoning.***

***Provide definitions, listings, and numerical/quantified parameters for availability of incentives within the private, City, County, and State properties and development within the City.***

---

**Housing Element** <housingelement@lacity.org>

Tue, Feb 16, 2021 at 10:54 AM

To: Tom Williams [REDACTED]

Cc: "cally.hardy@lacity.org" <cally.hardy@lacity.org>, Matt Glesne <matthew.glesne@lacity.org>

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team  
[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Re: Housing Element Public Comments Initial Study 2021 #6

3 messages

Tom Williams &lt;[REDACTED]&gt;

Mon, Feb 15, 2021 at 4:57 PM

To: "housingelement@lacity.org" &lt;housingelement@lacity.org&gt;, "cally.hardy@lacity.org" &lt;cally.hardy@lacity.org&gt;

Cc: Matt Glesne &lt;matthew.glesne@lacity.org&gt;

DATE: 021521

TO: City of Los Angeles, Department of City Planning ATTN: Cally Hardy, City Planning Associate

200 N. Spring Street, Room 750, Los Angeles, CA 90012 Phone: (213) 978-1643

E-mail: [housingelement@lacity.org](mailto:housingelement@lacity.org) &

SUBJECT: NOP/Initial Study and Scoping Comments for Housing Element Draft EIR

Case Numbers: CPC-2020-1365-GPA; ENV-2020-6762-EIR OPR/SCH-2021010130

RE: Request for Extension of Comment Review Period until Monday March 1, 2021 and Other Comments for NOP/IS #6

FROM: name: Dr Clyde Thomas Williams, Retired 1972-2012 environmental consultant for CEQA and NEPA worldwide

telephone: 323-528-9682 contact information [REDACTED] LA-32 NC Director 4117  
Barrett Rd. LA, 90032-1712

COMMENTS: I find, in general, that the Initial Study sections are inadequate and incomplete and not worthy of public review and consideration.

Placing the Comments Deadline on a national holiday for which City offices are closed and staff are on Long Weekend Holiday leave places the Public at a disadvantage which is usually address by postponing the submission deadline until the next operating workday ...February 16, 2021. Additional comments shall be submitted on 021621 and if not included in DEIR shall be grounds for appeal for the entire CEQA process.

As indicated in previous comment submittals and those to follow, the current NOP and IS are totally inadequate for review and meaningful comments and I again request an extension of two weeks to March 1, 2021.

### CONTENTS

Numerical designation 3/5 indicates the Notice of Preparation page/paragraph for each comment. Provide requires that the DEIR include the requested provision.

14/1 [Housing] Element Inventory of Sites, there is existing identified capacity ranging from 285,411 to 461,222 units; however, due to the new requirements to demonstrate **realistic development potential** that is likely to occur during the eight-year planning period, it is anticipated that the **realistic capacity demonstrated** on these sites will be diminished. The City is currently in the process of developing the **proposed methodology** to identify the **anticipated capacity and realistic development potential**. In order to meet the state-mandated deadline for adoption of the Housing Element, the



City's environmental review will rely on a **conservative estimate** of the potential outcome of that methodology. The methodology and basis for that estimate are described as follows.

***Provide numerical/quantified assessment of "realistic development potential" "realistic capacity demonstrated", and "anticipated capacity" and examples of the same for "unrealistic" potentials/capacities.***

***Provide definitions and parameters and ranges for conservative, moderate, and liberal potential outcomes for the methodology(ies).***

***Through a numerical/quantified computerized model/program integrated with ZIMAS provide review of annual applications for each year in the 5<sup>th</sup> Updated and anticipate future estimates for the Project.***

14/2 Proposed Methodology for Housing Element Inventory of Sites To comply with the new State requirements, the City intends to develop an **econometric model** to identify **realistic development potential** and **demonstrate zoned capacity**. The results of this model will be applied to **potential sites** that are zoned to permit residential development, in order to **determine the realistic development potential during the eight-year planning period (2021-2029)**.

***Provide specific State requirements and specific related econometric parameters for use in a numerical/quantified computer model/program for specific realistic development potential and demonstrated zoned/zonal capacities, along with buffering elements for site zoning and capacities.***

***Provide similar model/program for both proposed and potential sites in the IOS.***

***Provide for required annual comparisons of actual and desired performance of the HUProject for 2021-2029 on an annual basis of monitoring and reporting as part of the MM&RP.***

14/FN8 Based on **remaining capacity** from the **5th cycle Inventory of Sites**, after removing sites that have had a building permit issued, with and without conversion factors. As of building permit analysis completed on August 27, 2020.

***Provide net annual capacities, construction permits, and occupancy permits for 2012-2021 2018-2019, 2019-2020, 2020-2021, and 2021-22 and annually thereafter and their remaining net capacity.***

***Provide similar model/program for both proposed and potential sites in the IOS on an annual basis of monitoring and reporting as part of the MM&RP.***

---

**Housing Element** <housingelement@lacity.org>

Tue, Feb 16, 2021 at 10:57 AM

To: Tom Williams [REDACTED]

Cc: "cally.hardy@lacity.org" <cally.hardy@lacity.org>, Matt Glesne <matthew.glesne@lacity.org>

Thank you for your email. Your comments and/or attachments have been received and filed.

As provided in prior emails, due to the mandatory state deadline for adoption of the Housing Element Update, we are unable to extend the scoping period as requested. Please know that there will be additional opportunity for public review and comment on the Draft EIR when it is released later this Spring.

Regards,  
The Housing Element Team  
[Quoted text hidden]

---

**Tom Williams** [REDACTED]

Tue, Feb 16, 2021 at 11:59 AM

To: "housingelement@lacity.org" <housingelement@lacity.org>, "cally.hardy@lacity.org" <cally.hardy@lacity.org>

Cc: Matt Glesne <matthew.glesne@lacity.org>

DATE: 021621

TO: City of Los Angeles, Department of City Planning ATTN: Cally Hardy, City Planning Associate

200 N. Spring Street, Room 750, Los Angeles, CA 90012 Phone: (213) 978-1643

E-mail: [housingelement@lacity.org](mailto:housingelement@lacity.org) &

SUBJECT: NOP/Initial Study and Scoping Comments for Housing Element Draft EIR

Case Numbers: CPC-2020-1365-GPA; ENV-2020-6762-EIR OPR/SCH-2021010130

RE: Request for Extension of Comment Review Period until Monday March 1, 2021 and Other Comments for NOP/IS #7

FROM: name: Dr Clyde Thomas Williams, Retired 1972-2012 environmental consultant for CEQA and NEPA worldwide

telephone: 323-528-9682 contact information [REDACTED] LA-32 NC Director 4117  
Barrett Rd. LA, 90032-1712

COMMENTS: I find, in general, that the Initial Study sections are inadequate and incomplete and not worthy of public review and consideration.

Placing the Comments Deadline on a national holiday for which City offices are closed and staff are on Long Weekend Holiday leave places the Public at a disadvantage which is usually address by postponing the submission deadline until the next operating workday ...February 16, 2021. Additional comments are being submitted on 021621 and if not included in DEIR shall be grounds for appeal for the entire CEQA process.

As indicated in previous comment submittals and those to follow, the current NOP and IS are totally inadequate for review and meaningful comments and I again request an extension of two weeks to March 1, 2021.

## CONTENTS

Numerical designation 3/5 indicates the Notice of Preparation page/paragraph for each comment. Provide requires that the DEIR include the requested provision.

14/3 The **model** would use eight years of past housing development permits to estimate the amount of new housing that was actually produced during that period given **planned capacity**. The difference between **current planned capacity** on a site and existing housing on the site would serve as a **baseline estimate of capacity for the site**. The baseline would then be adjusted based on the **estimated empirical relationship** between **planned additional capacity and actual development**. Moreover, the **model** would accommodate the **various additional state requirements** by conditioning the **empirical estimates** on a variety of **additional variables** reflecting those requirements, such as **age of existing building, FAR and existing land use**.

*Provide numerical/quantitative computerized model/program incorporating ZIMAS databases, permitting, and rezoning/zoning, including 2012-21 and 2021-29 zoning/rezoning and current zoning and capacities for all sites in IOS.*

*Provide developed baseline factors for all IOS-sites and provide runs with 25% variation plus/minus for representative samples of IOS sites of various zonings/rezonings.*

14/4 Assumptions It is anticipated that the result of the proposed methodology will yield a **realistic development potential** that is similar to the **total amount of housing development that has historically occurred during an eight-year period in the City**. This estimate will be **adjusted upwards to account for recent and pending changes to the City's development conditions** that **reasonably** support the argument that **additional development may occur**. This includes adjustments based on:

Added **planned capacity** and **development potential** as a result of recently-adopted affordable housing streamlining tools, including the City's **Transit Oriented Communities (TOC) Program**, **local affordable housing incentive programs**, and **state streamlining bills SB 35 and AB 2162** that have **expanded utilization of the City's Density Bonus** program;

**added development potential** as a result of recent changes to **state Accessory Dwelling Unit (ADU) laws**;

*Provide definitions, numerical ranges and examples of realistic and unrealistic development potentials.*

*Provide definitions, numerical ranges, typical and elevated adjustments, and examples of estimates for development potentials.*

*Provide definitions, numerical ranges and examples of reasonable support for realistic and unrealistic development potentials.*

*Provide definitions, numerical ranges and examples of planned and potential capacities for affordable housing within and beyond TOC for all IOS-sites.*

*Provide definitions, numerical ranges and examples of incentive programs, stream-lining, use of Density Bonus and their impacts on realistic and unrealistic development potentials.*

23/2 6. Description of Safety Element Update The Safety Element is one of the eight State-mandated elements of the General Plan. The purpose of the update to the Safety Element is to **comply with recent State legislation and guidelines....** Technical amendments...made to the Safety Element to **achieve compliance with State, regional and local policies and guidelines.** The technical amendments will incorporate data and maps, address **vulnerability to climate change; incorporate policies and programs from the City's updates to the Local Hazard Mitigation Plan and the Floodplain Management Plan**, as well as partial or full integration of other recent city documents (including but limited to: Resilient Los Angeles, L.A. Green New Deal/2019 Sustainability Plan and the Emergency Management Department Emergency Plans and Annexes). The **Safety Element amendments will be submitted** to the California Geological Survey, California Office of Emergency Services, California State Board of Forestry and Fire Protection, and Federal Emergency Management Agency for review.

*Provide listing and maps of affected sites do to changes of laws, regulations, and guidelines with regard to IOS sites and landslides, liquefaction, and seismic hazards as identified in ZIMAS, including expected seismic levels (e.g., 6.5-7.1 RM) and surface Fault Zones.*

*Provide specific laws, ordinances, and/or guideline requiring pre-Plan review by stated agencies of the Plan separated from those through the CEQA/OPR circulation of the Initial Study and DEIR for review and comments.*

23/5 This project takes a **conservative approach** by analyzing the **reasonable "worst case" scenario** of environmental impacts from future implementation of the 2021-2029 Housing Element, which is the **full build-out of the City's RHNA allocation...**

*Provide definitions, numerical ranges and examples of conservative, moderate, or liberal approaches and of worst, moderate, and best cases for housing planning.*

*Provide numerical/quantified tables and maps regarding the "full build out" by years for 2000-2021 of RHNA allocations. Provide current status for all vacant sites which have been vacant for more than 20 years along with tables and maps showing all parcels vacant but zoned for housing by decade since zoning.*

24/1 Analyzing the production of between 419,261 and 429,261 units is intended to provide a **conservative analysis** of the **reasonable worst-case scenario** of **environmental impacts** from **future implementation** of the 2021-2029 Housing Element.

*Provide definitions, numerical ranges and examples of conservative analysis.*

*Provide definitions, numerical ranges, typical and elevated adjustments, and examples of estimates for development potentials.*

***Provide definitions, numerical ranges and examples of reasonable worst, moderate, and best case scenarios for significant and non-significant impacts of 5<sup>th</sup> Update housing and that for this Project.***

24/2 These units may occur anywhere in the City where **residential uses are permitted**, as described below. While some units are anticipated to be **built on the Opportunity Sites** identified in the Housing Element Inventory of Sites, it is not reasonable to expect that housing development will occur **solely on those Opportunity Sites**. Housing may occur on any site that is currently zoned for residential use; whereas the Opportunity Sites are subject to a number of requirements to **demonstrate realistic likelihood of development** and are intended to demonstrate **existing zoned capacity** to accommodate the City's RHNA allocation (see Background). In addition, these **units may also occur on sites that do not currently allow residential uses or multi-family residential uses of adequate density** and will be **rezoned in the future under a Housing Element rezoning implementation program (i.e., Rezoned Sites)**.

***Provide definitions, numerical ranges and examples of permitted and expected industrial, public and open space lands suitable for rezoning for residential development.***

***Provide definitions, numerical ranges and examples of permitted and expected residential lands suitable for rezoning for higher residential density development (e.g., RE20 >R3).***

***Provide definitions and numerical estimates of "demonstrate realistic likelihood".***

***Provide sites for potential rezoning to higher densities and for IOS sites to expected highest densities.***

***Provide map and tables of all "Rezoned Sites" that "will be rezoned in the future"***



Housing Element &lt;housingelement@lacity.org&gt;

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## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

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**William Wright** <[REDACTED]>

Tue, Jan 26, 2021 at 10:02 AM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

It is disappointing that Planning does not intend to pursue the equitable distribution approach in the housing element update. Planning recently released an Initial Study for the housing element update which contains numerous inadequacies that merit serious concern. Planning's analysis suggests that the City can achieve over 80% of its RHNA target with no significant zoning or policy changes, and that the remaining 20% can be accommodated via already-in-progress community plan updates and changes to the City's Density Bonus program.

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Planning anticipates that under current zoning, Los Angeles can expect to build 307,000 more homes between 2022 and 2029. However, Los Angeles only permitted about 114,000 homes during the eight-year period ending in 2019, leading to a net increase of 99,000 homes during that time. Planning offers no convincing rationale for why they expect housing production to nearly triple without significant policy or zoning changes.

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Planning anticipates accommodating 93,000 homes primarily through a series of community plan updates that are already in progress. However, many draft community plan updates highlighted in the Initial Study, including updates for the Westside, Hollywood, Southwest Valley, Southeast Valley, and Purple Line Transit Neighborhood Plan, are unambitious and do little to create significant amounts of new housing capacity. This approach also allows high-resource neighborhoods whose community plan update processes have not yet started, like Brentwood-Pacific Palisades and Westwood, to avoid zoning reforms that are necessary to accommodate the City's RHNA goal. This is unfair.

I strongly oppose Planning's "status quo" approach to the housing element update, which would do little to meaningfully address unaffordable housing costs, lengthy commutes, poor air quality, displacement of lower-income renters, and segregated neighborhoods. Fortunately, with eight months remaining until housing element updates are due, there is still time to change course and create an equitable, transformative housing element. I urge you to instruct the Department of City Planning to take this important step for Los Angeles' future.

Personally sent by William Wright using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
William Wright  
734 E Kensington Rd Los Angeles, CA 90026-4427  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:52 PM

To: Will Wright [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element <housingelement@lacity.org>

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## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

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**Bryce Wynn** [REDACTED]

Sat, Feb 13, 2021 at 1:48 PM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

I am writing to urge you to instruct the Department of City Planning to heavily revise the housing element update in favor of significant zoning reform and real action rather than attempting to meet the dire housing need without real action to develop housing. LA's development history over the past 10 years is abysmal, and the fact that the department of city planning believes we will develop housing at nearly 4x the rate we have been is unconscionable. Additionally, what little development there has been has come at the benefit only of those wealthy enough to move into the new luxury development zoning laws force, or has come at the massive advantage of those who already own property within the city. The fact that there was no upzoning around the new subway expansion is a disgrace, turning what could have been an amazing public benefit helping to move this city away from its dependence on cars into a further win for the wealthy who could already afford to own seven figure homes in the immediate area.

I encourage you to ask the department of city planning to re-consider, and focus on zoning reforms to help enable them to do so.

Personally sent by Bryce Wynn using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Bryce Wynn  
1620 Brockton Ave Apt 3 Los Angeles, CA 90025-3740  
[REDACTED]

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**Housing Element** <housingelement@lacity.org>

Tue, Feb 16, 2021 at 10:32 AM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

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## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

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Jonathan Yang <[REDACTED]>

Wed, Feb 3, 2021 at 10:57 AM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

It is disappointing that Planning does not intend to pursue the equitable distribution approach in the housing element update. Planning recently released an Initial Study for the housing element update which contains numerous inadequacies that merit serious concern. Planning's analysis suggests that the City can achieve over 80% of its RHNA target with no significant zoning or policy changes, and that the remaining 20% can be accommodated via already-in-progress community plan updates and changes to the City's Density Bonus program.

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Personally sent by Jonathan Yang using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Jonathan Yang

1324 N New Hampshire Ave Apt 208 Los Angeles, CA 90027-6038  
[REDACTED]



**Housing Element** <housingelement@lacity.org>

Thu, Feb 4, 2021 at 1:58 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,

The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

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## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

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**Sean Youssefi** <[REDACTED]>

Tue, Jan 26, 2021 at 12:00 AM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Sean Youssefi using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Sean Youssefi

1422 19th St Apt B Santa Monica, CA 90404-2818  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:52 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

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## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Afshin Youssefye [REDACTED]

Mon, Jan 25, 2021 at 4:22 PM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Personally sent by Afshin Youssefye using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Afshin Youssefye  
6524 Orange St Los Angeles, CA 90048-4722  
[REDACTED]

**Housing Element** <housingelement@lacity.org>  
[REDACTED]

Thu, Jan 28, 2021 at 4:50 PM

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

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## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Kevin Zelaya [REDACTED]

Sat, Feb 13, 2021 at 9:46 AM

Reply-To [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Personally sent by Kevin Zelaya using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Kevin Zelaya  
1139 S Rimpau Blvd Los Angeles, CA 90019-1812  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Tue, Feb 16, 2021 at 10:31 AM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Natalya Zernitskaya &lt;[REDACTED]&gt;

Mon, Jan 25, 2021 at 1:46 PM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Natalya Zernitskaya using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Natalya Zernitskaya  
2508 Kansas Ave Santa Monica, CA 90404-5243  
[REDACTED]



**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:46 PM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element <housingelement@lacity.org>

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## CPC-2020-1365-GPA; ENV-2020-6762-EIR

2 messages

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**IAN THE ZEVOS** [REDACTED] >  
To: housingelement@lacity.org

Mon, Feb 15, 2021 at 4:04 PM

Dear Ms. Hardy

i'm writing to urge you to include existing trees and the mature tree canopy as a topic to be analyzed in the EIR listed on your staff presentation [Scoping Meeting for the Housing Element 2021-2029 Update/Safety Element Update].

mature trees are routinely removed from lots and parkways during development. the City can ill afford this, as we have been losing canopy steadily as the heat risk increases. to create a sustainable equitable Los Angeles, tree preservation has to be part of the equation. to clarify - mature trees have to be part of the equation - simply re-planting has been studied and is not a mitigation of the loss of mature trees.

it would be a serious omission to ignore the detrimental effects of urban forest reduction in the course of creating a blueprint for future housing. housing must be planned in a sustainable, equitable way, and trees should be a key element of that plan. I urge you to add existing trees and the mature tree canopy as an individual element on your list of topics

thank you for your time and consideration.

sincerely,

ianthe zevos

ianthe zevos (she | her)  
[REDACTED]

---

**Housing Element** <housingelement@lacity.org>

Tue, Feb 16, 2021 at 10:51 AM

To: IAN THE ZEVOS [REDACTED] >

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Nabeel Zewail &lt;[REDACTED]&gt;

Sat, Feb 13, 2021 at 10:35 AM

Reply-To: [REDACTED]  
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Planning anticipates accommodating 93,000 homes primarily through a series of community plan updates that are already in progress. However, many draft community plan updates highlighted in the Initial Study, including updates for the Westside, Hollywood, Southwest Valley, Southeast Valley, and Purple Line Transit Neighborhood Plan, are unambitious and do little to create significant amounts of new housing capacity. This approach also allows high-resource neighborhoods whose community plan update processes have not yet started, like Brentwood-Pacific Palisades and Westwood, to avoid zoning reforms that are necessary to accommodate the City's RHNA goal. This is unfair.

I strongly oppose Planning's "status quo" approach to the housing element update, which would do little to meaningfully address unaffordable housing costs, lengthy commutes, poor air quality, displacement of lower-income renters, and segregated neighborhoods. Fortunately, with eight months remaining until housing element updates are due, there is still time to change course and create an equitable, transformative housing element. I urge you to instruct the Department of City Planning to take this important step for Los Angeles' future.

Personally sent by Nabeel Zewail using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Nabeel Zewail  
871 Winston Ave San Marino, CA 91108-1430  
[REDACTED]

**Housing Element** <housingelement@lacity.org>

Tue, Feb 16, 2021 at 10:32 AM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element <housingelement@lacity.org>

---

## Fwd: Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

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**Blair Smith** <blair.smith@lacity.org>  
To: Housing Element <housingelement@lacity.org>

Mon, Jan 25, 2021 at 10:56 AM

----- Forwarded message -----

From: **Flora Melendez** <flora.melendez@lacity.org>  
Date: Mon, Jan 25, 2021 at 10:40 AM  
Subject: Fwd: Housing Element Environmental Impact Report - Opposition to Status Quo Plan  
To: Cally Hardy <cally.hardy@lacity.org>, Blair Smith <blair.smith@lacity.org>  
CC: Arthi Varma <arthi.varma@lacity.org>, Matthew Glesne <matthew.glesne@lacity.org>

Hello.

I'm forwarding an email received by Vince.

Thank you.

~ Angie



LOS ANGELES  
CITY PLANNING

**Flora (Angie) Melendez**  
Pronouns: she/hers/her  
Executive Administrative Assistant  
**Los Angeles City Planning**  
200 N. Spring St., Suite 525C  
Los Angeles, CA 90012  
Planning4LA.org  
T: (213) 978-1271 | F: (213) 978-1275  
E: flora.melendez@lacity.org



----- Forwarded message -----

From: **Vince Bertoni** <vince.bertoni@lacity.org>  
Date: Mon, Jan 25, 2021 at 10:38 AM  
Subject: Fwd: Housing Element Environmental Impact Report - Opposition to Status Quo Plan  
To: Flora Melendez <flora.melendez@lacity.org>

**Vincent P. Bertoni, AICP**  
Pronouns: He, His, Him  
Director of Planning  
**Los Angeles City Planning**  
200 N. Spring St., Suite 525C



Los Angeles, CA 90012



----- Forwarded message -----

From: **Huixin Zheng** [REDACTED] ▶  
Date: Mon, Jan 25, 2021 at 10:37 AM  
Subject: Housing Element Environmental Impact Report - Opposition to Status Quo Plan  
To: <[vince.bertoni@lacity.org](mailto:vince.bertoni@lacity.org)>

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

It is disappointing that Planning does not intend to pursue the equitable distribution approach in the housing element update. Planning recently released an Initial Study for the housing element update which contains numerous inadequacies that merit serious concern. Planning's analysis suggests that the City can achieve over 80% of its RHNA target with no significant zoning or policy changes, and that the remaining 20% can be accommodated via already-in-progress community plan updates and changes to the City's Density Bonus program.

The facts do not support these conclusions, and that Planning's "status quo" proposal is flawed for the following reasons:

Planning's "status quo" proposal fails to affirmatively further fair housing, which is required under state law. By planning for most housing growth on parcels where multifamily development is already allowed, the City is steering housing opportunities away from the 75% of the City's residentially-zoned land that is restricted to single-family housing only. This perpetuates historic patterns of segregation and exclusion, and continues to push housing opportunities for lower-income households towards lower-income neighborhoods.

Planning anticipates that under current zoning, Los Angeles can expect to build 307,000 more homes between 2022 and 2029. However, Los Angeles only permitted about 114,000 homes during the eight-year period ending in 2019, leading to a net increase of 99,000 homes during that time. Planning offers no convincing rationale for why they expect housing production to nearly triple without significant policy or zoning changes.

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I strongly oppose Planning's "status quo" approach to the housing element update, which would do little to meaningfully address unaffordable housing costs, lengthy commutes, poor air quality, displacement of lower-income renters, and segregated neighborhoods. Fortunately, with eight months remaining until housing element updates are due, there is still time to change course and create an equitable, transformative housing element. I urge you to instruct the Department of City Planning to take this important step for Los Angeles' future.

Personally sent by Huixin Zheng using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Huixin Zheng  
5103 Palo Verde Rd Irvine, CA 92617-4308



--



LOS ANGELES  
CITY PLANNING

**Blair Smith**  
City Planner  
**Los Angeles City Planning**  
200 N. Spring St., Room 750  
Los Angeles, CA. 90012  
Planning4LA.org  
T: (213) 978-1886



---

**Housing Element** <housingelement@lacity.org>

Thu, Jan 28, 2021 at 4:34 PM

To: Huixin Zheng

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team

[Quoted text hidden]



Housing Element &lt;housingelement@lacity.org&gt;

---

## Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

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**Nicholas Ziff Griffin** <[REDACTED]>

Wed, Feb 3, 2021 at 8:56 AM

Reply-To: [REDACTED]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Personally sent by Nicholas Ziff Griffin using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Nicholas Ziff Griffin  
600 Wilshire Blvd Ste 870 Los Angeles, CA 90017-3224  
[REDACTED]



**Housing Element** <housingelement@lacity.org>

Thu, Feb 4, 2021 at 9:56 AM

To [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,

The Housing Element Team

[Quoted text hidden]

# Appendix C

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CalEEMod Data

Sample Scenario - 2 Pieces of Equipment, 25 Truck Trips - Los Angeles-South Coast County, Summer

## Sample Scenario - 2 Pieces of Equipment, 25 Truck Trips Los Angeles-South Coast County, Summer

### 1.0 Project Characteristics

#### 1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Apartments Low Rise	10.00	Dwelling Unit	0.63	10,000.00	29

#### 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>	11	<b>Operational Year</b>	2021		
<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

Table Name	Column Name	Default Value	New Value
tblArchitecturalCoating	ConstArea_Residential_Exterior	6,750.00	0.00
tblArchitecturalCoating	ConstArea_Residential_Interior	20,250.00	0.00
tblConstDustMitigation	WaterUnpavedRoadVehicleSpeed	0	15
tblGrading	AcresOfGrading	0.50	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00

tblOffRoadEquipment	UsageHours	6.00	8.00
tblOffRoadEquipment	UsageHours	4.00	8.00
tblOffRoadEquipment	UsageHours	7.00	8.00
tblOffRoadEquipment	UsageHours	1.00	8.00
tblTripsAndVMT	HaulingTripNumber	0.00	25.00
tblTripsAndVMT	HaulingTripNumber	0.00	25.00
tblTripsAndVMT	HaulingTripNumber	0.00	25.00
tblTripsAndVMT	HaulingTripNumber	0.00	25.00
tblTripsAndVMT	HaulingTripNumber	0.00	25.00
tblTripsAndVMT	HaulingTripNumber	0.00	25.00
tblTripsAndVMT	VendorTripNumber	1.00	0.00
tblTripsAndVMT	WorkerTripNumber	13.00	10.00
tblTripsAndVMT	WorkerTripNumber	15.00	10.00
tblTripsAndVMT	WorkerTripNumber	7.00	20.00
tblTripsAndVMT	WorkerTripNumber	20.00	10.00
tblTripsAndVMT	WorkerTripNumber	1.00	10.00

## 2.0 Emissions Summary

### 2.1 Overall Construction (Maximum Daily Emission)

#### Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	2.9843	36.4985	22.7675	0.0532	12.5931	1.4087	13.9790	6.7699	1.3099	8.0457	0.0000	5,255.1916	5,255.1916	1.2385	0.0000	5,286.1542
<b>Maximum</b>	<b>2.9843</b>	<b>36.4985</b>	<b>22.7675</b>	<b>0.0532</b>	<b>12.5931</b>	<b>1.4087</b>	<b>13.9790</b>	<b>6.7699</b>	<b>1.3099</b>	<b>8.0457</b>	<b>0.0000</b>	<b>5,255.1916</b>	<b>5,255.1916</b>	<b>1.2385</b>	<b>0.0000</b>	<b>5,286.1542</b>

**Mitigated Construction**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	2.9843	36.4985	22.7675	0.0532	5.9688	1.4087	7.3547	3.1287	1.3099	4.4044	0.0000	5,255.1916	5,255.1916	1.2385	0.0000	5,286.1542
<b>Maximum</b>	<b>2.9843</b>	<b>36.4985</b>	<b>22.7675</b>	<b>0.0532</b>	<b>5.9688</b>	<b>1.4087</b>	<b>7.3547</b>	<b>3.1287</b>	<b>1.3099</b>	<b>4.4044</b>	<b>0.0000</b>	<b>5,255.1916</b>	<b>5,255.1916</b>	<b>1.2385</b>	<b>0.0000</b>	<b>5,286.1542</b>

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
<b>Percent Reduction</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>52.60</b>	<b>0.00</b>	<b>47.39</b>	<b>53.79</b>	<b>0.00</b>	<b>45.26</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>

**3.0 Construction Detail**

**Construction Phase**

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	1/1/2021	1/14/2021	5	10	
2	Site Preparation	Site Preparation	1/15/2021	1/15/2021	5	1	
3	Grading	Grading	1/16/2021	1/19/2021	5	2	
4	Building Construction	Building Construction	1/20/2021	6/8/2021	5	100	
5	Paving	Paving	6/9/2021	6/15/2021	5	5	
6	Architectural Coating	Architectural Coating	6/16/2021	6/22/2021	5	5	

**Acres of Grading (Site Preparation Phase): 0**

**Acres of Grading (Grading Phase): 4**

**Acres of Paving: 0**

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0

**OffRoad Equipment**

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Rubber Tired Dozers	2	8.00	247	0.40
Site Preparation	Rubber Tired Dozers	2	8.00	247	0.40
Grading	Scrapers	2	8.00	367	0.48
Building Construction	Cranes	2	8.00	231	0.29
Paving	Pavers	2	8.00	130	0.42
Architectural Coating	Air Compressors	2	8.00	78	0.48
Paving	Cement and Mortar Mixers	4	6.00	9	0.56
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Grading	Concrete/Industrial Saws	1	8.00	81	0.73
Building Construction	Forklifts	2	6.00	89	0.20
Site Preparation	Graders	1	8.00	187	0.41
Paving	Rollers	1	7.00	80	0.38
Grading	Rubber Tired Dozers	1	1.00	247	0.40
Building Construction	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Demolition	Tractors/Loaders/Backhoes	2	6.00	97	0.37
Grading	Tractors/Loaders/Backhoes	2	6.00	97	0.37
Paving	Tractors/Loaders/Backhoes	1	7.00	97	0.37
Site Preparation	Tractors/Loaders/Backhoes	1	8.00	97	0.37

**Trips and VMT**

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	5	10.00	0.00	25.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	4	10.00	0.00	25.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	6	10.00	0.00	25.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	6	20.00	0.00	25.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	8	10.00	0.00	25.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

Architectural Coating	2	10.00	0.00	25.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
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### 3.1 Mitigation Measures Construction

Water Exposed Area

Reduce Vehicle Speed on Unpaved Roads

### 3.2 Demolition - 2021

#### Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.7585	27.8242	15.1400	0.0280		1.4057	1.4057		1.3071	1.3071		2,698.7191	2,698.7191	0.7156		2,716.6080
<b>Total</b>	<b>2.7585</b>	<b>27.8242</b>	<b>15.1400</b>	<b>0.0280</b>		<b>1.4057</b>	<b>1.4057</b>		<b>1.3071</b>	<b>1.3071</b>		<b>2,698.7191</b>	<b>2,698.7191</b>	<b>0.7156</b>		<b>2,716.6080</b>

#### Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0208	0.6706	0.1572	1.9500e-003	0.0437	2.0600e-003	0.0458	0.0120	1.9700e-003	0.0140		211.6116	211.6116	0.0144		211.9706
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0429	0.0295	0.4028	1.1400e-003	0.1118	9.0000e-004	0.1127	0.0296	8.3000e-004	0.0305		113.8770	113.8770	3.3600e-003		113.9609
<b>Total</b>	<b>0.0637</b>	<b>0.7001</b>	<b>0.5600</b>	<b>3.0900e-003</b>	<b>0.1555</b>	<b>2.9600e-003</b>	<b>0.1585</b>	<b>0.0416</b>	<b>2.8000e-003</b>	<b>0.0444</b>		<b>325.4886</b>	<b>325.4886</b>	<b>0.0177</b>		<b>325.9315</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	lb/day										lb/day					
Off-Road	2.7585	27.8242	15.1400	0.0280		1.4057	1.4057		1.3071	1.3071	0.0000	2,698.7191	2,698.7191	0.7156		2,716.6080
<b>Total</b>	<b>2.7585</b>	<b>27.8242</b>	<b>15.1400</b>	<b>0.0280</b>		<b>1.4057</b>	<b>1.4057</b>		<b>1.3071</b>	<b>1.3071</b>	<b>0.0000</b>	<b>2,698.7191</b>	<b>2,698.7191</b>	<b>0.7156</b>		<b>2,716.6080</b>

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0208	0.6706	0.1572	1.9500e-003	0.0437	2.0600e-003	0.0458	0.0120	1.9700e-003	0.0140		211.6116	211.6116	0.0144		211.9706
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0429	0.0295	0.4028	1.1400e-003	0.1118	9.0000e-004	0.1127	0.0296	8.3000e-004	0.0305		113.8770	113.8770	3.3600e-003		113.9609
<b>Total</b>	<b>0.0637</b>	<b>0.7001</b>	<b>0.5600</b>	<b>3.0900e-003</b>	<b>0.1555</b>	<b>2.9600e-003</b>	<b>0.1585</b>	<b>0.0416</b>	<b>2.8000e-003</b>	<b>0.0444</b>		<b>325.4886</b>	<b>325.4886</b>	<b>0.0177</b>		<b>325.9315</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	lb/day										lb/day					
Fugitive Dust					12.0442	0.0000	12.0442	6.6205	0.0000	6.6205			0.0000			0.0000
Off-Road	2.7330	29.7630	12.1030	0.0268		1.3644	1.3644		1.2552	1.2552		2,597.2886	2,597.2886	0.8400		2,618.2890
<b>Total</b>	<b>2.7330</b>	<b>29.7630</b>	<b>12.1030</b>	<b>0.0268</b>	<b>12.0442</b>	<b>1.3644</b>	<b>13.4086</b>	<b>6.6205</b>	<b>1.2552</b>	<b>7.8757</b>		<b>2,597.2886</b>	<b>2,597.2886</b>	<b>0.8400</b>		<b>2,618.2890</b>

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.2085	6.7061	1.5724	0.0195	0.4371	0.0206	0.4577	0.1198	0.0197	0.1395		2,116.1157	2,116.1157	0.1436		2,119.7059
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0429	0.0295	0.4028	1.1400e-003	0.1118	9.0000e-004	0.1127	0.0296	8.3000e-004	0.0305		113.8770	113.8770	3.3600e-003		113.9609
<b>Total</b>	<b>0.2513</b>	<b>6.7356</b>	<b>1.9752</b>	<b>0.0206</b>	<b>0.5489</b>	<b>0.0215</b>	<b>0.5704</b>	<b>0.1495</b>	<b>0.0205</b>	<b>0.1700</b>		<b>2,229.9927</b>	<b>2,229.9927</b>	<b>0.1470</b>		<b>2,233.6667</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	lb/day										lb/day					
Fugitive Dust					5.4199	0.0000	5.4199	2.9792	0.0000	2.9792			0.0000			0.0000

Off-Road	2.7330	29.7630	12.1030	0.0268		1.3644	1.3644		1.2552	1.2552	0.0000	2,597.2886	2,597.2886	0.8400		2,618.2890
<b>Total</b>	<b>2.7330</b>	<b>29.7630</b>	<b>12.1030</b>	<b>0.0268</b>	<b>5.4199</b>	<b>1.3644</b>	<b>6.7843</b>	<b>2.9792</b>	<b>1.2552</b>	<b>4.2344</b>	<b>0.0000</b>	<b>2,597.2886</b>	<b>2,597.2886</b>	<b>0.8400</b>		<b>2,618.2890</b>

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.2085	6.7061	1.5724	0.0195	0.4371	0.0206	0.4577	0.1198	0.0197	0.1395		2,116.1157	2,116.1157	0.1436		2,119.7059
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0429	0.0295	0.4028	1.1400e-003	0.1118	9.0000e-004	0.1127	0.0296	8.3000e-004	0.0305		113.8770	113.8770	3.3600e-003		113.9609
<b>Total</b>	<b>0.2513</b>	<b>6.7356</b>	<b>1.9752</b>	<b>0.0206</b>	<b>0.5489</b>	<b>0.0215</b>	<b>0.5704</b>	<b>0.1495</b>	<b>0.0205</b>	<b>0.1700</b>		<b>2,229.9927</b>	<b>2,229.9927</b>	<b>0.1470</b>		<b>2,233.6667</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	lb/day										lb/day					
Fugitive Dust					2.8738	0.0000	2.8738	0.6428	0.0000	0.6428			0.0000			0.0000
Off-Road	2.6554	28.6586	21.5785	0.0423		1.2401	1.2401		1.1547	1.1547		4,083.2568	4,083.2568	1.1633		4,112.3404
<b>Total</b>	<b>2.6554</b>	<b>28.6586</b>	<b>21.5785</b>	<b>0.0423</b>	<b>2.8738</b>	<b>1.2401</b>	<b>4.1139</b>	<b>0.6428</b>	<b>1.1547</b>	<b>1.7975</b>		<b>4,083.2568</b>	<b>4,083.2568</b>	<b>1.1633</b>		<b>4,112.3404</b>

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.1042	3.3530	0.7862	9.7500e-003	0.2186	0.0103	0.2289	0.0599	9.8500e-003	0.0698		1,058.0578	1,058.0578	0.0718		1,059.8529
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0429	0.0295	0.4028	1.1400e-003	0.1118	9.0000e-004	0.1127	0.0296	8.3000e-004	0.0305		113.8770	113.8770	3.3600e-003		113.9609
<b>Total</b>	<b>0.1471</b>	<b>3.3825</b>	<b>1.1890</b>	<b>0.0109</b>	<b>0.3304</b>	<b>0.0112</b>	<b>0.3415</b>	<b>0.0896</b>	<b>0.0107</b>	<b>0.1002</b>		<b>1,171.9348</b>	<b>1,171.9348</b>	<b>0.0752</b>		<b>1,173.8138</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	lb/day										lb/day					
Fugitive Dust					1.2932	0.0000	1.2932	0.2893	0.0000	0.2893			0.0000			0.0000
Off-Road	2.6554	28.6586	21.5785	0.0423		1.2401	1.2401		1.1547	1.1547	0.0000	4,083.2568	4,083.2568	1.1633		4,112.3404
<b>Total</b>	<b>2.6554</b>	<b>28.6586</b>	<b>21.5785</b>	<b>0.0423</b>	<b>1.2932</b>	<b>1.2401</b>	<b>2.5333</b>	<b>0.2893</b>	<b>1.1547</b>	<b>1.4440</b>	<b>0.0000</b>	<b>4,083.2568</b>	<b>4,083.2568</b>	<b>1.1633</b>		<b>4,112.3404</b>

**Mitigated Construction Off-Site**

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

Hauling	0.1042	3.3530	0.7862	9.7500e-003	0.2186	0.0103	0.2289	0.0599	9.8500e-003	0.0698		1,058.0578	1,058.0578	0.0718		1,059.8529
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0429	0.0295	0.4028	1.1400e-003	0.1118	9.0000e-004	0.1127	0.0296	8.3000e-004	0.0305		113.8770	113.8770	3.3600e-003		113.9609
<b>Total</b>	<b>0.1471</b>	<b>3.3825</b>	<b>1.1890</b>	<b>0.0109</b>	<b>0.3304</b>	<b>0.0112</b>	<b>0.3415</b>	<b>0.0896</b>	<b>0.0107</b>	<b>0.1002</b>		<b>1,171.9348</b>	<b>1,171.9348</b>	<b>0.0752</b>		<b>1,173.8138</b>

### 3.5 Building Construction - 2021

#### Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.3944	15.2590	10.2379	0.0200		0.7429	0.7429		0.6834	0.6834		1,941.3239	1,941.3239	0.6279		1,957.0205
<b>Total</b>	<b>1.3944</b>	<b>15.2590</b>	<b>10.2379</b>	<b>0.0200</b>		<b>0.7429</b>	<b>0.7429</b>		<b>0.6834</b>	<b>0.6834</b>		<b>1,941.3239</b>	<b>1,941.3239</b>	<b>0.6279</b>		<b>1,957.0205</b>

#### Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	2.0800e-003	0.0671	0.0157	2.0000e-004	4.3700e-003	2.1000e-004	4.5800e-003	1.2000e-003	2.0000e-004	1.4000e-003		21.1612	21.1612	1.4400e-003		21.1971
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0857	0.0589	0.8056	2.2900e-003	0.2236	1.8100e-003	0.2254	0.0593	1.6600e-003	0.0610		227.7540	227.7540	6.7100e-003		227.9217
<b>Total</b>	<b>0.0878</b>	<b>0.1260</b>	<b>0.8213</b>	<b>2.4900e-003</b>	<b>0.2279</b>	<b>2.0200e-003</b>	<b>0.2299</b>	<b>0.0605</b>	<b>1.8600e-003</b>	<b>0.0624</b>		<b>248.9151</b>	<b>248.9151</b>	<b>8.1500e-003</b>		<b>249.1188</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	lb/day										lb/day					
Off-Road	1.3944	15.2590	10.2379	0.0200		0.7429	0.7429		0.6834	0.6834	0.0000	1,941.3239	1,941.3239	0.6279		1,957.0205
<b>Total</b>	<b>1.3944</b>	<b>15.2590</b>	<b>10.2379</b>	<b>0.0200</b>		<b>0.7429</b>	<b>0.7429</b>		<b>0.6834</b>	<b>0.6834</b>	<b>0.0000</b>	<b>1,941.3239</b>	<b>1,941.3239</b>	<b>0.6279</b>		<b>1,957.0205</b>

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	2.0800e-003	0.0671	0.0157	2.0000e-004	4.3700e-003	2.1000e-004	4.5800e-003	1.2000e-003	2.0000e-004	1.4000e-003		21.1612	21.1612	1.4400e-003		21.1971
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0857	0.0589	0.8056	2.2900e-003	0.2236	1.8100e-003	0.2254	0.0593	1.6600e-003	0.0610		227.7540	227.7540	6.7100e-003		227.9217
<b>Total</b>	<b>0.0878</b>	<b>0.1260</b>	<b>0.8213</b>	<b>2.4900e-003</b>	<b>0.2279</b>	<b>2.0200e-003</b>	<b>0.2299</b>	<b>0.0605</b>	<b>1.8600e-003</b>	<b>0.0624</b>		<b>248.9151</b>	<b>248.9151</b>	<b>8.1500e-003</b>		<b>249.1188</b>

**3.6 Paving - 2021**

**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.9984	9.6372	10.3578	0.0166		0.4945	0.4945		0.4584	0.4584		1,547.2860	1,547.2860	0.4671		1,558.9646
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
<b>Total</b>	<b>0.9984</b>	<b>9.6372</b>	<b>10.3578</b>	<b>0.0166</b>		<b>0.4945</b>	<b>0.4945</b>		<b>0.4584</b>	<b>0.4584</b>		<b>1,547.2860</b>	<b>1,547.2860</b>	<b>0.4671</b>		<b>1,558.9646</b>

### Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0417	1.3412	0.3145	3.9000e-003	0.0874	4.1200e-003	0.0915	0.0240	3.9400e-003	0.0279		423.2231	423.2231	0.0287		423.9412
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0429	0.0295	0.4028	1.1400e-003	0.1118	9.0000e-004	0.1127	0.0296	8.3000e-004	0.0305		113.8770	113.8770	3.3600e-003		113.9609
<b>Total</b>	<b>0.0846</b>	<b>1.3707</b>	<b>0.7173</b>	<b>5.0400e-003</b>	<b>0.1992</b>	<b>5.0200e-003</b>	<b>0.2042</b>	<b>0.0536</b>	<b>4.7700e-003</b>	<b>0.0584</b>		<b>537.1001</b>	<b>537.1001</b>	<b>0.0321</b>		<b>537.9020</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	lb/day										lb/day					
Off-Road	0.9984	9.6372	10.3578	0.0166		0.4945	0.4945		0.4584	0.4584	0.0000	1,547.2860	1,547.2860	0.4671		1,558.9646

Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
<b>Total</b>	<b>0.9984</b>	<b>9.6372</b>	<b>10.3578</b>	<b>0.0166</b>		<b>0.4945</b>	<b>0.4945</b>		<b>0.4584</b>	<b>0.4584</b>	<b>0.0000</b>	<b>1,547.2860</b>	<b>1,547.2860</b>	<b>0.4671</b>		<b>1,558.9646</b>

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0417	1.3412	0.3145	3.9000e-003	0.0874	4.1200e-003	0.0915	0.0240	3.9400e-003	0.0279		423.2231	423.2231	0.0287		423.9412
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0429	0.0295	0.4028	1.1400e-003	0.1118	9.0000e-004	0.1127	0.0296	8.3000e-004	0.0305		113.8770	113.8770	3.3600e-003		113.9609
<b>Total</b>	<b>0.0846</b>	<b>1.3707</b>	<b>0.7173</b>	<b>5.0400e-003</b>	<b>0.1992</b>	<b>5.0200e-003</b>	<b>0.2042</b>	<b>0.0536</b>	<b>4.7700e-003</b>	<b>0.0584</b>		<b>537.1001</b>	<b>537.1001</b>	<b>0.0321</b>		<b>537.9020</b>

**3.7 Architectural Coating - 2021**

**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.5837	4.0716	4.8468	7.9200e-003		0.2509	0.2509		0.2509	0.2509		750.5281	750.5281	0.0515		751.8158
<b>Total</b>	<b>0.5837</b>	<b>4.0716</b>	<b>4.8468</b>	<b>7.9200e-003</b>		<b>0.2509</b>	<b>0.2509</b>		<b>0.2509</b>	<b>0.2509</b>		<b>750.5281</b>	<b>750.5281</b>	<b>0.0515</b>		<b>751.8158</b>

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0417	1.3412	0.3145	3.9000e-003	0.0874	4.1200e-003	0.0915	0.0240	3.9400e-003	0.0279		423.2231	423.2231	0.0287		423.9412
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0429	0.0295	0.4028	1.1400e-003	0.1118	9.0000e-004	0.1127	0.0296	8.3000e-004	0.0305		113.8770	113.8770	3.3600e-003		113.9609
<b>Total</b>	<b>0.0846</b>	<b>1.3707</b>	<b>0.7173</b>	<b>5.0400e-003</b>	<b>0.1992</b>	<b>5.0200e-003</b>	<b>0.2042</b>	<b>0.0536</b>	<b>4.7700e-003</b>	<b>0.0584</b>		<b>537.1001</b>	<b>537.1001</b>	<b>0.0321</b>		<b>537.9020</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	lb/day										lb/day					
Archit. Coating	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.5837	4.0716	4.8468	7.9200e-003		0.2509	0.2509		0.2509	0.2509	0.0000	750.5281	750.5281	0.0515		751.8158
<b>Total</b>	<b>0.5837</b>	<b>4.0716</b>	<b>4.8468</b>	<b>7.9200e-003</b>		<b>0.2509</b>	<b>0.2509</b>		<b>0.2509</b>	<b>0.2509</b>	<b>0.0000</b>	<b>750.5281</b>	<b>750.5281</b>	<b>0.0515</b>		<b>751.8158</b>

**Mitigated Construction Off-Site**

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



Hauling	0.0417	1.3412	0.3145	3.9000e-003	0.0874	4.1200e-003	0.0915	0.0240	3.9400e-003	0.0279		423.2231	423.2231	0.0287		423.9412
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0429	0.0295	0.4028	1.1400e-003	0.1118	9.0000e-004	0.1127	0.0296	8.3000e-004	0.0305		113.8770	113.8770	3.3600e-003		113.9609
<b>Total</b>	<b>0.0846</b>	<b>1.3707</b>	<b>0.7173</b>	<b>5.0400e-003</b>	<b>0.1992</b>	<b>5.0200e-003</b>	<b>0.2042</b>	<b>0.0536</b>	<b>4.7700e-003</b>	<b>0.0584</b>		<b>537.1001</b>	<b>537.1001</b>	<b>0.0321</b>		<b>537.9020</b>

Sample Scenario - 2 Pieces of Equipment, 25 Truck Trips - Los Angeles-South Coast County, Winter

## Sample Scenario - 2 Pieces of Equipment, 25 Truck Trips Los Angeles-South Coast County, Winter

### 1.0 Project Characteristics

#### 1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Apartments Low Rise	10.00	Dwelling Unit	0.63	10,000.00	29

#### 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>	11	<b>Operational Year</b>	2021		
<b>Utility Company</b>	Southern California Edison				
<b>CO2 Intensity (lb/MW hr)</b>	702.44	<b>CH4 Intensity (lb/MW hr)</b>	0.029	<b>N2O Intensity (lb/MW hr)</b>	0.006

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

Table Name	Column Name	Default Value	New Value
tblArchitecturalCoating	ConstArea_Residential_Exterior	6,750.00	0.00
tblArchitecturalCoating	ConstArea_Residential_Interior	20,250.00	0.00
tblConstDustMitigation	WaterUnpavedRoadVehicleSpeed	0	15
tblGrading	AcresOfGrading	0.50	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00

tblOffRoadEquipment	UsageHours	6.00	8.00
tblOffRoadEquipment	UsageHours	4.00	8.00
tblOffRoadEquipment	UsageHours	7.00	8.00
tblOffRoadEquipment	UsageHours	1.00	8.00
tblTripsAndVMT	HaulingTripNumber	0.00	25.00
tblTripsAndVMT	HaulingTripNumber	0.00	25.00
tblTripsAndVMT	HaulingTripNumber	0.00	25.00
tblTripsAndVMT	HaulingTripNumber	0.00	25.00
tblTripsAndVMT	HaulingTripNumber	0.00	25.00
tblTripsAndVMT	HaulingTripNumber	0.00	25.00
tblTripsAndVMT	VendorTripNumber	1.00	0.00
tblTripsAndVMT	WorkerTripNumber	13.00	10.00
tblTripsAndVMT	WorkerTripNumber	15.00	10.00
tblTripsAndVMT	WorkerTripNumber	7.00	20.00
tblTripsAndVMT	WorkerTripNumber	20.00	10.00
tblTripsAndVMT	WorkerTripNumber	1.00	10.00

## 2.0 Emissions Summary

### 2.1 Overall Construction (Maximum Daily Emission)

#### Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	2.9941	36.5838	22.7805	0.0530	12.5931	1.4087	13.9793	6.7699	1.3099	8.0460	0.0000	5,230.2108	5,230.2108	1.2408	0.0000	5,261.2316
<b>Maximum</b>	<b>2.9941</b>	<b>36.5838</b>	<b>22.7805</b>	<b>0.0530</b>	<b>12.5931</b>	<b>1.4087</b>	<b>13.9793</b>	<b>6.7699</b>	<b>1.3099</b>	<b>8.0460</b>	<b>0.0000</b>	<b>5,230.2108</b>	<b>5,230.2108</b>	<b>1.2408</b>	<b>0.0000</b>	<b>5,261.2316</b>

**Mitigated Construction**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	2.9941	36.5838	22.7805	0.0530	5.9688	1.4087	7.3550	3.1287	1.3099	4.4047	0.0000	5,230.2108	5,230.2108	1.2408	0.0000	5,261.2316
<b>Maximum</b>	<b>2.9941</b>	<b>36.5838</b>	<b>22.7805</b>	<b>0.0530</b>	<b>5.9688</b>	<b>1.4087</b>	<b>7.3550</b>	<b>3.1287</b>	<b>1.3099</b>	<b>4.4047</b>	<b>0.0000</b>	<b>5,230.2108</b>	<b>5,230.2108</b>	<b>1.2408</b>	<b>0.0000</b>	<b>5,261.2316</b>

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
<b>Percent Reduction</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>52.60</b>	<b>0.00</b>	<b>47.39</b>	<b>53.79</b>	<b>0.00</b>	<b>45.26</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>

**3.0 Construction Detail**

**Construction Phase**

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	1/1/2021	1/14/2021	5	10	
2	Site Preparation	Site Preparation	1/15/2021	1/15/2021	5	1	
3	Grading	Grading	1/16/2021	1/19/2021	5	2	
4	Building Construction	Building Construction	1/20/2021	6/8/2021	5	100	
5	Paving	Paving	6/9/2021	6/15/2021	5	5	
6	Architectural Coating	Architectural Coating	6/16/2021	6/22/2021	5	5	

**Acres of Grading (Site Preparation Phase): 0**

**Acres of Grading (Grading Phase): 4**

**Acres of Paving: 0**

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0

**OffRoad Equipment**

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Rubber Tired Dozers	2	8.00	247	0.40
Site Preparation	Rubber Tired Dozers	2	8.00	247	0.40
Grading	Scrapers	2	8.00	367	0.48
Building Construction	Cranes	2	8.00	231	0.29
Paving	Pavers	2	8.00	130	0.42
Architectural Coating	Air Compressors	2	8.00	78	0.48
Paving	Cement and Mortar Mixers	4	6.00	9	0.56
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Grading	Concrete/Industrial Saws	1	8.00	81	0.73
Building Construction	Forklifts	2	6.00	89	0.20
Site Preparation	Graders	1	8.00	187	0.41
Paving	Rollers	1	7.00	80	0.38
Grading	Rubber Tired Dozers	1	1.00	247	0.40
Building Construction	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Demolition	Tractors/Loaders/Backhoes	2	6.00	97	0.37
Grading	Tractors/Loaders/Backhoes	2	6.00	97	0.37
Paving	Tractors/Loaders/Backhoes	1	7.00	97	0.37
Site Preparation	Tractors/Loaders/Backhoes	1	8.00	97	0.37

**Trips and VMT**

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	5	10.00	0.00	25.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	4	10.00	0.00	25.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	6	10.00	0.00	25.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	6	20.00	0.00	25.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	8	10.00	0.00	25.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

Architectural Coating	2	10.00	0.00	25.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
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### 3.1 Mitigation Measures Construction

Water Exposed Area

Reduce Vehicle Speed on Unpaved Roads

### 3.2 Demolition - 2021

#### Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.7585	27.8242	15.1400	0.0280		1.4057	1.4057		1.3071	1.3071		2,698.7191	2,698.7191	0.7156		2,716.6080
<b>Total</b>	<b>2.7585</b>	<b>27.8242</b>	<b>15.1400</b>	<b>0.0280</b>		<b>1.4057</b>	<b>1.4057</b>		<b>1.3071</b>	<b>1.3071</b>		<b>2,698.7191</b>	<b>2,698.7191</b>	<b>0.7156</b>		<b>2,716.6080</b>

#### Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0214	0.6788	0.1667	1.9200e-003	0.0437	2.0900e-003	0.0458	0.0120	2.0000e-003	0.0140		207.9458	207.9458	0.0149		208.3175
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0477	0.0326	0.3683	1.0800e-003	0.1118	9.0000e-004	0.1127	0.0296	8.3000e-004	0.0305		107.2251	107.2251	3.1600e-003		107.3040
<b>Total</b>	<b>0.0690</b>	<b>0.7114</b>	<b>0.5350</b>	<b>3.0000e-003</b>	<b>0.1555</b>	<b>2.9900e-003</b>	<b>0.1585</b>	<b>0.0416</b>	<b>2.8300e-003</b>	<b>0.0445</b>		<b>315.1709</b>	<b>315.1709</b>	<b>0.0180</b>		<b>315.6214</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	lb/day										lb/day					
Off-Road	2.7585	27.8242	15.1400	0.0280		1.4057	1.4057		1.3071	1.3071	0.0000	2,698.7191	2,698.7191	0.7156		2,716.6080
<b>Total</b>	<b>2.7585</b>	<b>27.8242</b>	<b>15.1400</b>	<b>0.0280</b>		<b>1.4057</b>	<b>1.4057</b>		<b>1.3071</b>	<b>1.3071</b>	<b>0.0000</b>	<b>2,698.7191</b>	<b>2,698.7191</b>	<b>0.7156</b>		<b>2,716.6080</b>

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0214	0.6788	0.1667	1.9200e-003	0.0437	2.0900e-003	0.0458	0.0120	2.0000e-003	0.0140		207.9458	207.9458	0.0149		208.3175
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0477	0.0326	0.3683	1.0800e-003	0.1118	9.0000e-004	0.1127	0.0296	8.3000e-004	0.0305		107.2251	107.2251	3.1600e-003		107.3040
<b>Total</b>	<b>0.0690</b>	<b>0.7114</b>	<b>0.5350</b>	<b>3.0000e-003</b>	<b>0.1555</b>	<b>2.9900e-003</b>	<b>0.1585</b>	<b>0.0416</b>	<b>2.8300e-003</b>	<b>0.0445</b>		<b>315.1709</b>	<b>315.1709</b>	<b>0.0180</b>		<b>315.6214</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	lb/day										lb/day					
Fugitive Dust					12.0442	0.0000	12.0442	6.6205	0.0000	6.6205			0.0000			0.0000
Off-Road	2.7330	29.7630	12.1030	0.0268		1.3644	1.3644		1.2552	1.2552		2,597.2886	2,597.2886	0.8400		2,618.2890
<b>Total</b>	<b>2.7330</b>	<b>29.7630</b>	<b>12.1030</b>	<b>0.0268</b>	<b>12.0442</b>	<b>1.3644</b>	<b>13.4086</b>	<b>6.6205</b>	<b>1.2552</b>	<b>7.8757</b>		<b>2,597.2886</b>	<b>2,597.2886</b>	<b>0.8400</b>		<b>2,618.2890</b>

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.2135	6.7882	1.6673	0.0192	0.4371	0.0209	0.4580	0.1198	0.0200	0.1398		2,079.4577	2,079.4577	0.1487		2,083.1745
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0477	0.0326	0.3683	1.0800e-003	0.1118	9.0000e-004	0.1127	0.0296	8.3000e-004	0.0305		107.2251	107.2251	3.1600e-003		107.3040
<b>Total</b>	<b>0.2612</b>	<b>6.8209</b>	<b>2.0356</b>	<b>0.0203</b>	<b>0.5489</b>	<b>0.0218</b>	<b>0.5707</b>	<b>0.1495</b>	<b>0.0208</b>	<b>0.1703</b>		<b>2,186.6829</b>	<b>2,186.6829</b>	<b>0.1518</b>		<b>2,190.4785</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	lb/day										lb/day					
Fugitive Dust					5.4199	0.0000	5.4199	2.9792	0.0000	2.9792			0.0000			0.0000



Off-Road	2.7330	29.7630	12.1030	0.0268		1.3644	1.3644		1.2552	1.2552	0.0000	2,597.2886	2,597.2886	0.8400		2,618.2890
<b>Total</b>	<b>2.7330</b>	<b>29.7630</b>	<b>12.1030</b>	<b>0.0268</b>	<b>5.4199</b>	<b>1.3644</b>	<b>6.7843</b>	<b>2.9792</b>	<b>1.2552</b>	<b>4.2344</b>	<b>0.0000</b>	<b>2,597.2886</b>	<b>2,597.2886</b>	<b>0.8400</b>		<b>2,618.2890</b>

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.2135	6.7882	1.6673	0.0192	0.4371	0.0209	0.4580	0.1198	0.0200	0.1398		2,079.4577	2,079.4577	0.1487		2,083.1745
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0477	0.0326	0.3683	1.0800e-003	0.1118	9.0000e-004	0.1127	0.0296	8.3000e-004	0.0305		107.2251	107.2251	3.1600e-003		107.3040
<b>Total</b>	<b>0.2612</b>	<b>6.8209</b>	<b>2.0356</b>	<b>0.0203</b>	<b>0.5489</b>	<b>0.0218</b>	<b>0.5707</b>	<b>0.1495</b>	<b>0.0208</b>	<b>0.1703</b>		<b>2,186.6829</b>	<b>2,186.6829</b>	<b>0.1518</b>		<b>2,190.4785</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	lb/day										lb/day					
Fugitive Dust					2.8738	0.0000	2.8738	0.6428	0.0000	0.6428			0.0000			0.0000
Off-Road	2.6554	28.6586	21.5785	0.0423		1.2401	1.2401		1.1547	1.1547		4,083.2568	4,083.2568	1.1633		4,112.3404
<b>Total</b>	<b>2.6554</b>	<b>28.6586</b>	<b>21.5785</b>	<b>0.0423</b>	<b>2.8738</b>	<b>1.2401</b>	<b>4.1139</b>	<b>0.6428</b>	<b>1.1547</b>	<b>1.7975</b>		<b>4,083.2568</b>	<b>4,083.2568</b>	<b>1.1633</b>		<b>4,112.3404</b>

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.1067	3.3941	0.8337	9.5800e-003	0.2186	0.0105	0.2290	0.0599	0.0100	0.0699		1,039.7289	1,039.7289	0.0743		1,041.5873
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0477	0.0326	0.3683	1.0800e-003	0.1118	9.0000e-004	0.1127	0.0296	8.3000e-004	0.0305		107.2251	107.2251	3.1600e-003		107.3040
<b>Total</b>	<b>0.1544</b>	<b>3.4267</b>	<b>1.2019</b>	<b>0.0107</b>	<b>0.3304</b>	<b>0.0114</b>	<b>0.3417</b>	<b>0.0896</b>	<b>0.0108</b>	<b>0.1004</b>		<b>1,146.9540</b>	<b>1,146.9540</b>	<b>0.0775</b>		<b>1,148.8912</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	lb/day										lb/day					
Fugitive Dust					1.2932	0.0000	1.2932	0.2893	0.0000	0.2893			0.0000			0.0000
Off-Road	2.6554	28.6586	21.5785	0.0423		1.2401	1.2401		1.1547	1.1547	0.0000	4,083.2568	4,083.2568	1.1633		4,112.3404
<b>Total</b>	<b>2.6554</b>	<b>28.6586</b>	<b>21.5785</b>	<b>0.0423</b>	<b>1.2932</b>	<b>1.2401</b>	<b>2.5333</b>	<b>0.2893</b>	<b>1.1547</b>	<b>1.4440</b>	<b>0.0000</b>	<b>4,083.2568</b>	<b>4,083.2568</b>	<b>1.1633</b>		<b>4,112.3404</b>

**Mitigated Construction Off-Site**

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

Hauling	0.1067	3.3941	0.8337	9.5800e-003	0.2186	0.0105	0.2290	0.0599	0.0100	0.0699		1,039.7289	1,039.7289	0.0743		1,041.5873
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0477	0.0326	0.3683	1.0800e-003	0.1118	9.0000e-004	0.1127	0.0296	8.3000e-004	0.0305		107.2251	107.2251	3.1600e-003		107.3040
<b>Total</b>	<b>0.1544</b>	<b>3.4267</b>	<b>1.2019</b>	<b>0.0107</b>	<b>0.3304</b>	<b>0.0114</b>	<b>0.3417</b>	<b>0.0896</b>	<b>0.0108</b>	<b>0.1004</b>		<b>1,146.9540</b>	<b>1,146.9540</b>	<b>0.0775</b>		<b>1,148.8912</b>

### 3.5 Building Construction - 2021

#### Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.3944	15.2590	10.2379	0.0200		0.7429	0.7429		0.6834	0.6834		1,941.3239	1,941.3239	0.6279		1,957.0205
<b>Total</b>	<b>1.3944</b>	<b>15.2590</b>	<b>10.2379</b>	<b>0.0200</b>		<b>0.7429</b>	<b>0.7429</b>		<b>0.6834</b>	<b>0.6834</b>		<b>1,941.3239</b>	<b>1,941.3239</b>	<b>0.6279</b>		<b>1,957.0205</b>

#### Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	2.1300e-003	0.0679	0.0167	1.9000e-004	4.3700e-003	2.1000e-004	4.5800e-003	1.2000e-003	2.0000e-004	1.4000e-003		20.7946	20.7946	1.4900e-003		20.8317
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0954	0.0652	0.7365	2.1500e-003	0.2236	1.8100e-003	0.2254	0.0593	1.6600e-003	0.0610		214.4502	214.4502	6.3100e-003		214.6080
<b>Total</b>	<b>0.0975</b>	<b>0.1331</b>	<b>0.7532</b>	<b>2.3400e-003</b>	<b>0.2279</b>	<b>2.0200e-003</b>	<b>0.2299</b>	<b>0.0605</b>	<b>1.8600e-003</b>	<b>0.0624</b>		<b>235.2448</b>	<b>235.2448</b>	<b>7.8000e-003</b>		<b>235.4397</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	lb/day										lb/day					
Off-Road	1.3944	15.2590	10.2379	0.0200		0.7429	0.7429		0.6834	0.6834	0.0000	1,941.3239	1,941.3239	0.6279		1,957.0205
<b>Total</b>	<b>1.3944</b>	<b>15.2590</b>	<b>10.2379</b>	<b>0.0200</b>		<b>0.7429</b>	<b>0.7429</b>		<b>0.6834</b>	<b>0.6834</b>	<b>0.0000</b>	<b>1,941.3239</b>	<b>1,941.3239</b>	<b>0.6279</b>		<b>1,957.0205</b>

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	2.1300e-003	0.0679	0.0167	1.9000e-004	4.3700e-003	2.1000e-004	4.5800e-003	1.2000e-003	2.0000e-004	1.4000e-003		20.7946	20.7946	1.4900e-003		20.8317
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0954	0.0652	0.7365	2.1500e-003	0.2236	1.8100e-003	0.2254	0.0593	1.6600e-003	0.0610		214.4502	214.4502	6.3100e-003		214.6080
<b>Total</b>	<b>0.0975</b>	<b>0.1331</b>	<b>0.7532</b>	<b>2.3400e-003</b>	<b>0.2279</b>	<b>2.0200e-003</b>	<b>0.2299</b>	<b>0.0605</b>	<b>1.8600e-003</b>	<b>0.0624</b>		<b>235.2448</b>	<b>235.2448</b>	<b>7.8000e-003</b>		<b>235.4397</b>

**3.6 Paving - 2021**

**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.9984	9.6372	10.3578	0.0166		0.4945	0.4945		0.4584	0.4584		1,547.2860	1,547.2860	0.4671		1,558.9646
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
<b>Total</b>	<b>0.9984</b>	<b>9.6372</b>	<b>10.3578</b>	<b>0.0166</b>		<b>0.4945</b>	<b>0.4945</b>		<b>0.4584</b>	<b>0.4584</b>		<b>1,547.2860</b>	<b>1,547.2860</b>	<b>0.4671</b>		<b>1,558.9646</b>

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0427	1.3577	0.3335	3.8300e-003	0.0874	4.1800e-003	0.0916	0.0240	4.0000e-003	0.0280		415.8916	415.8916	0.0297		416.6349
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0477	0.0326	0.3683	1.0800e-003	0.1118	9.0000e-004	0.1127	0.0296	8.3000e-004	0.0305		107.2251	107.2251	3.1600e-003		107.3040
<b>Total</b>	<b>0.0904</b>	<b>1.3903</b>	<b>0.7017</b>	<b>4.9100e-003</b>	<b>0.1992</b>	<b>5.0800e-003</b>	<b>0.2043</b>	<b>0.0536</b>	<b>4.8300e-003</b>	<b>0.0584</b>		<b>523.1167</b>	<b>523.1167</b>	<b>0.0329</b>		<b>523.9389</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	lb/day										lb/day					
Off-Road	0.9984	9.6372	10.3578	0.0166		0.4945	0.4945		0.4584	0.4584	0.0000	1,547.2860	1,547.2860	0.4671		1,558.9646

Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
<b>Total</b>	<b>0.9984</b>	<b>9.6372</b>	<b>10.3578</b>	<b>0.0166</b>		<b>0.4945</b>	<b>0.4945</b>		<b>0.4584</b>	<b>0.4584</b>	<b>0.0000</b>	<b>1,547.2860</b>	<b>1,547.2860</b>	<b>0.4671</b>		<b>1,558.9646</b>

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0427	1.3577	0.3335	3.8300e-003	0.0874	4.1800e-003	0.0916	0.0240	4.0000e-003	0.0280		415.8916	415.8916	0.0297		416.6349
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0477	0.0326	0.3683	1.0800e-003	0.1118	9.0000e-004	0.1127	0.0296	8.3000e-004	0.0305		107.2251	107.2251	3.1600e-003		107.3040
<b>Total</b>	<b>0.0904</b>	<b>1.3903</b>	<b>0.7017</b>	<b>4.9100e-003</b>	<b>0.1992</b>	<b>5.0800e-003</b>	<b>0.2043</b>	<b>0.0536</b>	<b>4.8300e-003</b>	<b>0.0584</b>		<b>523.1167</b>	<b>523.1167</b>	<b>0.0329</b>		<b>523.9389</b>

**3.7 Architectural Coating - 2021**

**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.5837	4.0716	4.8468	7.9200e-003		0.2509	0.2509		0.2509	0.2509		750.5281	750.5281	0.0515		751.8158
<b>Total</b>	<b>0.5837</b>	<b>4.0716</b>	<b>4.8468</b>	<b>7.9200e-003</b>		<b>0.2509</b>	<b>0.2509</b>		<b>0.2509</b>	<b>0.2509</b>		<b>750.5281</b>	<b>750.5281</b>	<b>0.0515</b>		<b>751.8158</b>

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0427	1.3577	0.3335	3.8300e-003	0.0874	4.1800e-003	0.0916	0.0240	4.0000e-003	0.0280		415.8916	415.8916	0.0297		416.6349
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0477	0.0326	0.3683	1.0800e-003	0.1118	9.0000e-004	0.1127	0.0296	8.3000e-004	0.0305		107.2251	107.2251	3.1600e-003		107.3040
<b>Total</b>	<b>0.0904</b>	<b>1.3903</b>	<b>0.7017</b>	<b>4.9100e-003</b>	<b>0.1992</b>	<b>5.0800e-003</b>	<b>0.2043</b>	<b>0.0536</b>	<b>4.8300e-003</b>	<b>0.0584</b>		<b>523.1167</b>	<b>523.1167</b>	<b>0.0329</b>		<b>523.9389</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	lb/day										lb/day					
Archit. Coating	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.5837	4.0716	4.8468	7.9200e-003		0.2509	0.2509		0.2509	0.2509	0.0000	750.5281	750.5281	0.0515		751.8158
<b>Total</b>	<b>0.5837</b>	<b>4.0716</b>	<b>4.8468</b>	<b>7.9200e-003</b>		<b>0.2509</b>	<b>0.2509</b>		<b>0.2509</b>	<b>0.2509</b>	<b>0.0000</b>	<b>750.5281</b>	<b>750.5281</b>	<b>0.0515</b>		<b>751.8158</b>

**Mitigated Construction Off-Site**

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

Hauling	0.0427	1.3577	0.3335	3.8300e-003	0.0874	4.1800e-003	0.0916	0.0240	4.0000e-003	0.0280		415.8916	415.8916	0.0297		416.6349
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0477	0.0326	0.3683	1.0800e-003	0.1118	9.0000e-004	0.1127	0.0296	8.3000e-004	0.0305		107.2251	107.2251	3.1600e-003		107.3040
<b>Total</b>	<b>0.0904</b>	<b>1.3903</b>	<b>0.7017</b>	<b>4.9100e-003</b>	<b>0.1992</b>	<b>5.0800e-003</b>	<b>0.2043</b>	<b>0.0536</b>	<b>4.8300e-003</b>	<b>0.0584</b>		<b>523.1167</b>	<b>523.1167</b>	<b>0.0329</b>		<b>523.9389</b>



Sample Scenario - 4 Pieces of Equipment, 50 Truck Trips - Los Angeles-South Coast County, Summer

## Sample Scenario - 4 Pieces of Equipment, 50 Truck Trips Los Angeles-South Coast County, Summer

### 1.0 Project Characteristics

#### 1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Apartments Low Rise	10.00	Dwelling Unit	0.63	10,000.00	29

#### 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>	11	<b>Operational Year</b>	2021		
<b>Utility Company</b>	Southern California Edison				
<b>CO2 Intensity (lb/MW hr)</b>	702.44	<b>CH4 Intensity (lb/MW hr)</b>	0.029	<b>N2O Intensity (lb/MW hr)</b>	0.006

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

Table Name	Column Name	Default Value	New Value
tblArchitecturalCoating	ConstArea_Residential_Exterior	6,750.00	0.00
tblArchitecturalCoating	ConstArea_Residential_Interior	20,250.00	0.00
tblConstDustMitigation	WaterUnpavedRoadVehicleSpeed	0	15
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	4.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00

tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	UsageHours	6.00	8.00
tblOffRoadEquipment	UsageHours	4.00	8.00
tblOffRoadEquipment	UsageHours	7.00	8.00
tblOffRoadEquipment	UsageHours	1.00	8.00
tblOffRoadEquipment	UsageHours	1.00	8.00
tblOffRoadEquipment	UsageHours	8.00	6.00
tblTripsAndVMT	HaulingTripNumber	0.00	50.00
tblTripsAndVMT	HaulingTripNumber	0.00	50.00
tblTripsAndVMT	HaulingTripNumber	0.00	50.00
tblTripsAndVMT	HaulingTripNumber	0.00	50.00
tblTripsAndVMT	HaulingTripNumber	0.00	50.00
tblTripsAndVMT	HaulingTripNumber	0.00	50.00
tblTripsAndVMT	VendorTripNumber	1.00	0.00
tblTripsAndVMT	WorkerTripNumber	10.00	20.00
tblTripsAndVMT	WorkerTripNumber	7.00	40.00
tblTripsAndVMT	WorkerTripNumber	10.00	20.00
tblTripsAndVMT	WorkerTripNumber	1.00	20.00
tblTripsAndVMT	WorkerTripNumber	10.00	20.00
tblTripsAndVMT	WorkerTripNumber	10.00	20.00

## 2.0 Emissions Summary

### 2.1 Overall Construction (Maximum Daily Emission)

#### Unmitigated Construction

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

2021	4.2458	50.1132	24.4629	0.0692	14.8259	1.9201	16.7459	7.0286	1.7672	8.7958	0.0000	6,934.3971	6,934.3971	1.6350	0.0000	6,975.2718
<b>Maximum</b>	<b>4.2458</b>	<b>50.1132</b>	<b>24.4629</b>	<b>0.0692</b>	<b>14.8259</b>	<b>1.9201</b>	<b>16.7459</b>	<b>7.0286</b>	<b>1.7672</b>	<b>8.7958</b>	<b>0.0000</b>	<b>6,934.3971</b>	<b>6,934.3971</b>	<b>1.6350</b>	<b>0.0000</b>	<b>6,975.2718</b>

### Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	4.2458	50.1132	24.4629	0.0692	7.0350	1.9201	8.9551	3.2781	1.7672	5.0286	0.0000	6,934.3971	6,934.3971	1.6350	0.0000	6,975.2718
<b>Maximum</b>	<b>4.2458</b>	<b>50.1132</b>	<b>24.4629</b>	<b>0.0692</b>	<b>7.0350</b>	<b>1.9201</b>	<b>8.9551</b>	<b>3.2781</b>	<b>1.7672</b>	<b>5.0286</b>	<b>0.0000</b>	<b>6,934.3971</b>	<b>6,934.3971</b>	<b>1.6350</b>	<b>0.0000</b>	<b>6,975.2718</b>

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
<b>Percent Reduction</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>52.55</b>	<b>0.00</b>	<b>46.52</b>	<b>53.36</b>	<b>0.00</b>	<b>42.83</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>

## 3.0 Construction Detail

### Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	1/1/2021	1/14/2021	5	10	
2	Site Preparation	Site Preparation	1/15/2021	1/15/2021	5	1	
3	Grading	Grading	1/16/2021	1/19/2021	5	2	
4	Building Construction	Building Construction	1/20/2021	6/8/2021	5	100	
5	Paving	Paving	6/9/2021	6/15/2021	5	5	

6	Architectural Coating	Architectural Coating	6/16/2021	6/22/2021	5	5
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Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 4

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0

**OffRoad Equipment**

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Grading	Rubber Tired Dozers	2	8.00	247	0.40
Grading	Scrapers	2	8.00	367	0.48
Building Construction	Cranes	2	8.00	231	0.29
Building Construction	Tractors/Loaders/Backhoes	2	6.00	97	0.37
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Architectural Coating	Air Compressors	4	8.00	78	0.48
Demolition	Concrete/Industrial Saws	2	8.00	81	0.73
Demolition	Rubber Tired Dozers	2	8.00	247	0.40
Site Preparation	Rubber Tired Dozers	2	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	2	8.00	97	0.37

**Trips and VMT**

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Grading	4	20.00	0.00	50.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	4	40.00	0.00	50.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	4	20.00	0.00	50.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	4	20.00	0.00	50.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Demolition	4	20.00	0.00	50.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	4	20.00	0.00	50.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

### 3.1 Mitigation Measures Construction

Water Exposed Area

Reduce Vehicle Speed on Unpaved Roads

### 3.2 Demolition - 2021

#### Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.8624	28.0184	15.4236	0.0296		1.4111	1.4111		1.3260	1.3260		2,840.0337	2,840.0337	0.6040		2,855.1335
<b>Total</b>	<b>2.8624</b>	<b>28.0184</b>	<b>15.4236</b>	<b>0.0296</b>		<b>1.4111</b>	<b>1.4111</b>		<b>1.3260</b>	<b>1.3260</b>		<b>2,840.0337</b>	<b>2,840.0337</b>	<b>0.6040</b>		<b>2,855.1335</b>

#### Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0417	1.3412	0.3145	3.9000e-003	0.0874	4.1200e-003	0.0915	0.0240	3.9400e-003	0.0279		423.2231	423.2231	0.0287		423.9412
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0857	0.0589	0.8056	2.2900e-003	0.2236	1.8100e-003	0.2254	0.0593	1.6600e-003	0.0610		227.7540	227.7540	6.7100e-003		227.9217
<b>Total</b>	<b>0.1274</b>	<b>1.4002</b>	<b>1.1200</b>	<b>6.1900e-003</b>	<b>0.3110</b>	<b>5.9300e-003</b>	<b>0.3169</b>	<b>0.0833</b>	<b>5.6000e-003</b>	<b>0.0889</b>		<b>650.9771</b>	<b>650.9771</b>	<b>0.0354</b>		<b>651.8629</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	lb/day										lb/day					
Off-Road	2.8624	28.0184	15.4236	0.0296		1.4111	1.4111		1.3260	1.3260	0.0000	2,840.0337	2,840.0337	0.6040		2,855.1335
<b>Total</b>	<b>2.8624</b>	<b>28.0184</b>	<b>15.4236</b>	<b>0.0296</b>		<b>1.4111</b>	<b>1.4111</b>		<b>1.3260</b>	<b>1.3260</b>	<b>0.0000</b>	<b>2,840.0337</b>	<b>2,840.0337</b>	<b>0.6040</b>		<b>2,855.1335</b>

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0417	1.3412	0.3145	3.9000e-003	0.0874	4.1200e-003	0.0915	0.0240	3.9400e-003	0.0279		423.2231	423.2231	0.0287		423.9412
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0857	0.0589	0.8056	2.2900e-003	0.2236	1.8100e-003	0.2254	0.0593	1.6600e-003	0.0610		227.7540	227.7540	6.7100e-003		227.9217
<b>Total</b>	<b>0.1274</b>	<b>1.4002</b>	<b>1.1200</b>	<b>6.1900e-003</b>	<b>0.3110</b>	<b>5.9300e-003</b>	<b>0.3169</b>	<b>0.0833</b>	<b>5.6000e-003</b>	<b>0.0889</b>		<b>650.9771</b>	<b>650.9771</b>	<b>0.0354</b>		<b>651.8629</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
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Category	lb/day										lb/day					
Fugitive Dust					12.0442	0.0000	12.0442	6.6205	0.0000	6.6205			0.0000			0.0000
Off-Road	2.4673	25.7342	12.5960	0.0233		1.2885	1.2885		1.1854	1.1854		2,256.5045	2,256.5045	0.7298		2,274.7495
<b>Total</b>	<b>2.4673</b>	<b>25.7342</b>	<b>12.5960</b>	<b>0.0233</b>	<b>12.0442</b>	<b>1.2885</b>	<b>13.3326</b>	<b>6.6205</b>	<b>1.1854</b>	<b>7.8058</b>		<b>2,256.5045</b>	<b>2,256.5045</b>	<b>0.7298</b>		<b>2,274.7495</b>

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	lb/day										lb/day						
Hauling	0.4169	13.4122	3.1448	0.0390	0.8743	0.0412	0.9154	0.2397	0.0394	0.2790		4,232.2314	4,232.2314	0.2872			4,239.4117
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000			0.0000
Worker	0.0857	0.0589	0.8056	2.2900e-003	0.2236	1.8100e-003	0.2254	0.0593	1.6600e-003	0.0610		227.7540	227.7540	6.7100e-003			227.9217
<b>Total</b>	<b>0.5026</b>	<b>13.4711</b>	<b>3.9503</b>	<b>0.0413</b>	<b>1.0978</b>	<b>0.0430</b>	<b>1.1408</b>	<b>0.2989</b>	<b>0.0411</b>	<b>0.3400</b>		<b>4,459.9853</b>	<b>4,459.9853</b>	<b>0.2939</b>			<b>4,467.3335</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	lb/day										lb/day					
Fugitive Dust					5.4199	0.0000	5.4199	2.9792	0.0000	2.9792			0.0000			0.0000
Off-Road	2.4673	25.7342	12.5960	0.0233		1.2885	1.2885		1.1854	1.1854	0.0000	2,256.5045	2,256.5045	0.7298		2,274.7495

<b>Total</b>	<b>2.4673</b>	<b>25.7342</b>	<b>12.5960</b>	<b>0.0233</b>	<b>5.4199</b>	<b>1.2885</b>	<b>6.7083</b>	<b>2.9792</b>	<b>1.1854</b>	<b>4.1646</b>	<b>0.0000</b>	<b>2,256.5045</b>	<b>2,256.5045</b>	<b>0.7298</b>		<b>2,274.7495</b>
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**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.4169	13.4122	3.1448	0.0390	0.8743	0.0412	0.9154	0.2397	0.0394	0.2790		4,232.2314	4,232.2314	0.2872		4,239.4117
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0857	0.0589	0.8056	2.2900e-003	0.2236	1.8100e-003	0.2254	0.0593	1.6600e-003	0.0610		227.7540	227.7540	6.7100e-003		227.9217
<b>Total</b>	<b>0.5026</b>	<b>13.4711</b>	<b>3.9503</b>	<b>0.0413</b>	<b>1.0978</b>	<b>0.0430</b>	<b>1.1408</b>	<b>0.2989</b>	<b>0.0411</b>	<b>0.3400</b>		<b>4,459.9853</b>	<b>4,459.9853</b>	<b>0.2939</b>		<b>4,467.3335</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	lb/day										lb/day					
Fugitive Dust					14.1652	0.0000	14.1652	6.8495	0.0000	6.8495			0.0000			0.0000
Off-Road	3.9516	43.3481	22.0849	0.0474		1.8977	1.8977		1.7459	1.7459		4,590.5274	4,590.5274	1.4847		4,627.6442
<b>Total</b>	<b>3.9516</b>	<b>43.3481</b>	<b>22.0849</b>	<b>0.0474</b>	<b>14.1652</b>	<b>1.8977</b>	<b>16.0628</b>	<b>6.8495</b>	<b>1.7459</b>	<b>8.5953</b>		<b>4,590.5274</b>	<b>4,590.5274</b>	<b>1.4847</b>		<b>4,627.6442</b>

**Unmitigated Construction Off-Site**



	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.2085	6.7061	1.5724	0.0195	0.4371	0.0206	0.4577	0.1198	0.0197	0.1395		2,116.1157	2,116.1157	0.1436		2,119.7059
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0857	0.0589	0.8056	2.2900e-003	0.2236	1.8100e-003	0.2254	0.0593	1.6600e-003	0.0610		227.7540	227.7540	6.7100e-003		227.9217
<b>Total</b>	<b>0.2942</b>	<b>6.7650</b>	<b>2.3779</b>	<b>0.0218</b>	<b>0.6607</b>	<b>0.0224</b>	<b>0.6831</b>	<b>0.1791</b>	<b>0.0214</b>	<b>0.2005</b>		<b>2,343.8697</b>	<b>2,343.8697</b>	<b>0.1503</b>		<b>2,347.6276</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	lb/day										lb/day					
Fugitive Dust					6.3743	0.0000	6.3743	3.0823	0.0000	3.0823			0.0000			0.0000
Off-Road	3.9516	43.3481	22.0849	0.0474		1.8977	1.8977		1.7459	1.7459	0.0000	4,590.5274	4,590.5274	1.4847		4,627.6442
<b>Total</b>	<b>3.9516</b>	<b>43.3481</b>	<b>22.0849</b>	<b>0.0474</b>	<b>6.3743</b>	<b>1.8977</b>	<b>8.2720</b>	<b>3.0823</b>	<b>1.7459</b>	<b>4.8281</b>	<b>0.0000</b>	<b>4,590.5274</b>	<b>4,590.5274</b>	<b>1.4847</b>		<b>4,627.6442</b>

**Mitigated Construction Off-Site**

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

Hauling	0.2085	6.7061	1.5724	0.0195	0.4371	0.0206	0.4577	0.1198	0.0197	0.1395		2,116.1157	2,116.1157	0.1436		2,119.7059
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0857	0.0589	0.8056	2.2900e-003	0.2236	1.8100e-003	0.2254	0.0593	1.6600e-003	0.0610		227.7540	227.7540	6.7100e-003		227.9217
<b>Total</b>	<b>0.2942</b>	<b>6.7650</b>	<b>2.3779</b>	<b>0.0218</b>	<b>0.6607</b>	<b>0.0224</b>	<b>0.6831</b>	<b>0.1791</b>	<b>0.0214</b>	<b>0.2005</b>		<b>2,343.8697</b>	<b>2,343.8697</b>	<b>0.1503</b>		<b>2,347.6276</b>

### 3.5 Building Construction - 2021

#### Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.1067	12.5424	7.3561	0.0162		0.5614	0.5614		0.5165	0.5165		1,568.8276	1,568.8276	0.5074		1,581.5124
<b>Total</b>	<b>1.1067</b>	<b>12.5424</b>	<b>7.3561</b>	<b>0.0162</b>		<b>0.5614</b>	<b>0.5614</b>		<b>0.5165</b>	<b>0.5165</b>		<b>1,568.8276</b>	<b>1,568.8276</b>	<b>0.5074</b>		<b>1,581.5124</b>

#### Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	4.1700e-003	0.1341	0.0315	3.9000e-004	8.7400e-003	4.1000e-004	9.1500e-003	2.4000e-003	3.9000e-004	2.7900e-003		42.3223	42.3223	2.8700e-003		42.3941
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.1715	0.1179	1.6111	4.5700e-003	0.4471	3.6100e-003	0.4507	0.1186	3.3300e-003	0.1219		455.5079	455.5079	0.0134		455.8435
<b>Total</b>	<b>0.1756</b>	<b>0.2520</b>	<b>1.6426</b>	<b>4.9600e-003</b>	<b>0.4559</b>	<b>4.0200e-003</b>	<b>0.4599</b>	<b>0.1210</b>	<b>3.7200e-003</b>	<b>0.1247</b>		<b>497.8303</b>	<b>497.8303</b>	<b>0.0163</b>		<b>498.2376</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	lb/day										lb/day					
Off-Road	1.1067	12.5424	7.3561	0.0162		0.5614	0.5614		0.5165	0.5165	0.0000	1,568.8276	1,568.8276	0.5074		1,581.5124
<b>Total</b>	<b>1.1067</b>	<b>12.5424</b>	<b>7.3561</b>	<b>0.0162</b>		<b>0.5614</b>	<b>0.5614</b>		<b>0.5165</b>	<b>0.5165</b>	<b>0.0000</b>	<b>1,568.8276</b>	<b>1,568.8276</b>	<b>0.5074</b>		<b>1,581.5124</b>

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	4.1700e-003	0.1341	0.0315	3.9000e-004	8.7400e-003	4.1000e-004	9.1500e-003	2.4000e-003	3.9000e-004	2.7900e-003		42.3223	42.3223	2.8700e-003		42.3941
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.1715	0.1179	1.6111	4.5700e-003	0.4471	3.6100e-003	0.4507	0.1186	3.3300e-003	0.1219		455.5079	455.5079	0.0134		455.8435
<b>Total</b>	<b>0.1756</b>	<b>0.2520</b>	<b>1.6426</b>	<b>4.9600e-003</b>	<b>0.4559</b>	<b>4.0200e-003</b>	<b>0.4599</b>	<b>0.1210</b>	<b>3.7200e-003</b>	<b>0.1247</b>		<b>497.8303</b>	<b>497.8303</b>	<b>0.0163</b>		<b>498.2376</b>

**3.6 Paving - 2021**

**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.8766	9.0706	10.8924	0.0176		0.4425	0.4425		0.4071	0.4071		1,699.0331	1,699.0331	0.5495		1,712.7707
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
<b>Total</b>	<b>0.8766</b>	<b>9.0706</b>	<b>10.8924</b>	<b>0.0176</b>		<b>0.4425</b>	<b>0.4425</b>		<b>0.4071</b>	<b>0.4071</b>		<b>1,699.0331</b>	<b>1,699.0331</b>	<b>0.5495</b>		<b>1,712.7707</b>

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0834	2.6824	0.6290	7.8000e-003	0.1749	8.2300e-003	0.1831	0.0479	7.8800e-003	0.0558		846.4463	846.4463	0.0574		847.8823
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0857	0.0589	0.8056	2.2900e-003	0.2236	1.8100e-003	0.2254	0.0593	1.6600e-003	0.0610		227.7540	227.7540	6.7100e-003		227.9217
<b>Total</b>	<b>0.1691</b>	<b>2.7414</b>	<b>1.4345</b>	<b>0.0101</b>	<b>0.3984</b>	<b>0.0100</b>	<b>0.4085</b>	<b>0.1072</b>	<b>9.5400e-003</b>	<b>0.1168</b>		<b>1,074.2002</b>	<b>1,074.2002</b>	<b>0.0642</b>		<b>1,075.8041</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	lb/day										lb/day					
Off-Road	0.8766	9.0706	10.8924	0.0176		0.4425	0.4425		0.4071	0.4071	0.0000	1,699.0331	1,699.0331	0.5495		1,712.7706

Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
<b>Total</b>	<b>0.8766</b>	<b>9.0706</b>	<b>10.8924</b>	<b>0.0176</b>		<b>0.4425</b>	<b>0.4425</b>		<b>0.4071</b>	<b>0.4071</b>	<b>0.0000</b>	<b>1,699.0331</b>	<b>1,699.0331</b>	<b>0.5495</b>		<b>1,712.7706</b>

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0834	2.6824	0.6290	7.8000e-003	0.1749	8.2300e-003	0.1831	0.0479	7.8800e-003	0.0558		846.4463	846.4463	0.0574		847.8823
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0857	0.0589	0.8056	2.2900e-003	0.2236	1.8100e-003	0.2254	0.0593	1.6600e-003	0.0610		227.7540	227.7540	6.7100e-003		227.9217
<b>Total</b>	<b>0.1691</b>	<b>2.7414</b>	<b>1.4345</b>	<b>0.0101</b>	<b>0.3984</b>	<b>0.0100</b>	<b>0.4085</b>	<b>0.1072</b>	<b>9.5400e-003</b>	<b>0.1168</b>		<b>1,074.2002</b>	<b>1,074.2002</b>	<b>0.0642</b>		<b>1,075.8041</b>

**3.7 Architectural Coating - 2021**

**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	1.1675	8.1432	9.6936	0.0159		0.5019	0.5019		0.5019	0.5019		1,501.0563	1,501.0563	0.1030		1,503.6315
<b>Total</b>	<b>1.1675</b>	<b>8.1432</b>	<b>9.6936</b>	<b>0.0159</b>		<b>0.5019</b>	<b>0.5019</b>		<b>0.5019</b>	<b>0.5019</b>		<b>1,501.0563</b>	<b>1,501.0563</b>	<b>0.1030</b>		<b>1,503.6315</b>

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0834	2.6824	0.6290	7.8000e-003	0.1749	8.2300e-003	0.1831	0.0479	7.8800e-003	0.0558		846.4463	846.4463	0.0574		847.8823
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0857	0.0589	0.8056	2.2900e-003	0.2236	1.8100e-003	0.2254	0.0593	1.6600e-003	0.0610		227.7540	227.7540	6.7100e-003		227.9217
<b>Total</b>	<b>0.1691</b>	<b>2.7414</b>	<b>1.4345</b>	<b>0.0101</b>	<b>0.3984</b>	<b>0.0100</b>	<b>0.4085</b>	<b>0.1072</b>	<b>9.5400e-003</b>	<b>0.1168</b>		<b>1,074.2002</b>	<b>1,074.2002</b>	<b>0.0642</b>		<b>1,075.8041</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	lb/day										lb/day					
Archit. Coating	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	1.1675	8.1432	9.6936	0.0159		0.5019	0.5019		0.5019	0.5019	0.0000	1,501.0563	1,501.0563	0.1030		1,503.6315
<b>Total</b>	<b>1.1675</b>	<b>8.1432</b>	<b>9.6936</b>	<b>0.0159</b>		<b>0.5019</b>	<b>0.5019</b>		<b>0.5019</b>	<b>0.5019</b>	<b>0.0000</b>	<b>1,501.0563</b>	<b>1,501.0563</b>	<b>0.1030</b>		<b>1,503.6315</b>

**Mitigated Construction Off-Site**

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

Hauling	0.0834	2.6824	0.6290	7.8000e-003	0.1749	8.2300e-003	0.1831	0.0479	7.8800e-003	0.0558		846.4463	846.4463	0.0574		847.8823
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0857	0.0589	0.8056	2.2900e-003	0.2236	1.8100e-003	0.2254	0.0593	1.6600e-003	0.0610		227.7540	227.7540	6.7100e-003		227.9217
<b>Total</b>	<b>0.1691</b>	<b>2.7414</b>	<b>1.4345</b>	<b>0.0101</b>	<b>0.3984</b>	<b>0.0100</b>	<b>0.4085</b>	<b>0.1072</b>	<b>9.5400e-003</b>	<b>0.1168</b>		<b>1,074.2002</b>	<b>1,074.2002</b>	<b>0.0642</b>		<b>1,075.8041</b>

Sample Scenario - 4 Pieces of Equipment, 50 Truck Trips - Los Angeles-South Coast County, Winter

## Sample Scenario - 4 Pieces of Equipment, 50 Truck Trips Los Angeles-South Coast County, Winter

### 1.0 Project Characteristics

#### 1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Apartments Low Rise	10.00	Dwelling Unit	0.63	10,000.00	29

#### 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>	11	<b>Operational Year</b>	2021		
<b>Utility Company</b>	Southern California Edison				
<b>CO2 Intensity (lb/MW hr)</b>	702.44	<b>CH4 Intensity (lb/MW hr)</b>	0.029	<b>N2O Intensity (lb/MW hr)</b>	0.006

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

Table Name	Column Name	Default Value	New Value
tblArchitecturalCoating	ConstArea_Residential_Exterior	6,750.00	0.00
tblArchitecturalCoating	ConstArea_Residential_Interior	20,250.00	0.00
tblConstDustMitigation	WaterUnpavedRoadVehicleSpeed	0	15
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	4.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00



tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	UsageHours	6.00	8.00
tblOffRoadEquipment	UsageHours	4.00	8.00
tblOffRoadEquipment	UsageHours	7.00	8.00
tblOffRoadEquipment	UsageHours	1.00	8.00
tblOffRoadEquipment	UsageHours	1.00	8.00
tblOffRoadEquipment	UsageHours	8.00	6.00
tblTripsAndVMT	HaulingTripNumber	0.00	50.00
tblTripsAndVMT	HaulingTripNumber	0.00	50.00
tblTripsAndVMT	HaulingTripNumber	0.00	50.00
tblTripsAndVMT	HaulingTripNumber	0.00	50.00
tblTripsAndVMT	HaulingTripNumber	0.00	50.00
tblTripsAndVMT	HaulingTripNumber	0.00	50.00
tblTripsAndVMT	VendorTripNumber	1.00	0.00
tblTripsAndVMT	WorkerTripNumber	10.00	20.00
tblTripsAndVMT	WorkerTripNumber	7.00	40.00
tblTripsAndVMT	WorkerTripNumber	10.00	20.00
tblTripsAndVMT	WorkerTripNumber	1.00	20.00
tblTripsAndVMT	WorkerTripNumber	10.00	20.00
tblTripsAndVMT	WorkerTripNumber	10.00	20.00

## 2.0 Emissions Summary

### 2.1 Overall Construction (Maximum Daily Emission)

#### Unmitigated Construction

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

2021	4.2605	50.2016	24.4888	0.0687	14.8259	1.9204	16.7462	7.0286	1.7675	8.7961	0.0000	6,884.4354	6,884.4354	1.6397	0.0000	6,925.4267
<b>Maximum</b>	<b>4.2605</b>	<b>50.2016</b>	<b>24.4888</b>	<b>0.0687</b>	<b>14.8259</b>	<b>1.9204</b>	<b>16.7462</b>	<b>7.0286</b>	<b>1.7675</b>	<b>8.7961</b>	<b>0.0000</b>	<b>6,884.4354</b>	<b>6,884.4354</b>	<b>1.6397</b>	<b>0.0000</b>	<b>6,925.4267</b>

### Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	4.2605	50.2016	24.4888	0.0687	7.0350	1.9204	8.9554	3.2781	1.7675	5.0289	0.0000	6,884.4354	6,884.4354	1.6397	0.0000	6,925.4266
<b>Maximum</b>	<b>4.2605</b>	<b>50.2016</b>	<b>24.4888</b>	<b>0.0687</b>	<b>7.0350</b>	<b>1.9204</b>	<b>8.9554</b>	<b>3.2781</b>	<b>1.7675</b>	<b>5.0289</b>	<b>0.0000</b>	<b>6,884.4354</b>	<b>6,884.4354</b>	<b>1.6397</b>	<b>0.0000</b>	<b>6,925.4266</b>

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
<b>Percent Reduction</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>52.55</b>	<b>0.00</b>	<b>46.52</b>	<b>53.36</b>	<b>0.00</b>	<b>42.83</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>

## 3.0 Construction Detail

### Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	1/1/2021	1/14/2021	5	10	
2	Site Preparation	Site Preparation	1/15/2021	1/15/2021	5	1	
3	Grading	Grading	1/16/2021	1/19/2021	5	2	
4	Building Construction	Building Construction	1/20/2021	6/8/2021	5	100	
5	Paving	Paving	6/9/2021	6/15/2021	5	5	

6	Architectural Coating	Architectural Coating	6/16/2021	6/22/2021	5	5
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Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 4

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0

**OffRoad Equipment**

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Grading	Rubber Tired Dozers	2	8.00	247	0.40
Grading	Scrapers	2	8.00	367	0.48
Building Construction	Cranes	2	8.00	231	0.29
Building Construction	Tractors/Loaders/Backhoes	2	6.00	97	0.37
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Architectural Coating	Air Compressors	4	8.00	78	0.48
Demolition	Concrete/Industrial Saws	2	8.00	81	0.73
Demolition	Rubber Tired Dozers	2	8.00	247	0.40
Site Preparation	Rubber Tired Dozers	2	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	2	8.00	97	0.37

**Trips and VMT**

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Grading	4	20.00	0.00	50.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	4	40.00	0.00	50.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	4	20.00	0.00	50.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	4	20.00	0.00	50.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Demolition	4	20.00	0.00	50.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	4	20.00	0.00	50.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

### 3.1 Mitigation Measures Construction

Water Exposed Area

Reduce Vehicle Speed on Unpaved Roads

### 3.2 Demolition - 2021

#### Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.8624	28.0184	15.4236	0.0296		1.4111	1.4111		1.3260	1.3260		2,840.0337	2,840.0337	0.6040		2,855.1335
<b>Total</b>	<b>2.8624</b>	<b>28.0184</b>	<b>15.4236</b>	<b>0.0296</b>		<b>1.4111</b>	<b>1.4111</b>		<b>1.3260</b>	<b>1.3260</b>		<b>2,840.0337</b>	<b>2,840.0337</b>	<b>0.6040</b>		<b>2,855.1335</b>

#### Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0427	1.3577	0.3335	3.8300e-003	0.0874	4.1800e-003	0.0916	0.0240	4.0000e-003	0.0280		415.8916	415.8916	0.0297		416.6349
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0954	0.0652	0.7365	2.1500e-003	0.2236	1.8100e-003	0.2254	0.0593	1.6600e-003	0.0610		214.4502	214.4502	6.3100e-003		214.6080
<b>Total</b>	<b>0.1381</b>	<b>1.4229</b>	<b>1.0700</b>	<b>5.9800e-003</b>	<b>0.3110</b>	<b>5.9900e-003</b>	<b>0.3170</b>	<b>0.0833</b>	<b>5.6600e-003</b>	<b>0.0889</b>		<b>630.3418</b>	<b>630.3418</b>	<b>0.0360</b>		<b>631.2429</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	lb/day										lb/day						
Off-Road	2.8624	28.0184	15.4236	0.0296		1.4111	1.4111		1.3260	1.3260	0.0000	2,840.0337	2,840.0337	0.6040			2,855.1335
<b>Total</b>	<b>2.8624</b>	<b>28.0184</b>	<b>15.4236</b>	<b>0.0296</b>		<b>1.4111</b>	<b>1.4111</b>		<b>1.3260</b>	<b>1.3260</b>	<b>0.0000</b>	<b>2,840.0337</b>	<b>2,840.0337</b>	<b>0.6040</b>			<b>2,855.1335</b>

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	lb/day										lb/day						
Hauling	0.0427	1.3577	0.3335	3.8300e-003	0.0874	4.1800e-003	0.0916	0.0240	4.0000e-003	0.0280		415.8916	415.8916	0.0297			416.6349
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000			0.0000
Worker	0.0954	0.0652	0.7365	2.1500e-003	0.2236	1.8100e-003	0.2254	0.0593	1.6600e-003	0.0610		214.4502	214.4502	6.3100e-003			214.6080
<b>Total</b>	<b>0.1381</b>	<b>1.4229</b>	<b>1.0700</b>	<b>5.9800e-003</b>	<b>0.3110</b>	<b>5.9900e-003</b>	<b>0.3170</b>	<b>0.0833</b>	<b>5.6600e-003</b>	<b>0.0889</b>		<b>630.3418</b>	<b>630.3418</b>	<b>0.0360</b>			<b>631.2429</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
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Category	lb/day										lb/day					
Fugitive Dust					12.0442	0.0000	12.0442	6.6205	0.0000	6.6205			0.0000			0.0000
Off-Road	2.4673	25.7342	12.5960	0.0233		1.2885	1.2885		1.1854	1.1854		2,256.5045	2,256.5045	0.7298		2,274.7495
<b>Total</b>	<b>2.4673</b>	<b>25.7342</b>	<b>12.5960</b>	<b>0.0233</b>	<b>12.0442</b>	<b>1.2885</b>	<b>13.3326</b>	<b>6.6205</b>	<b>1.1854</b>	<b>7.8058</b>		<b>2,256.5045</b>	<b>2,256.5045</b>	<b>0.7298</b>		<b>2,274.7495</b>

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.4269	13.5765	3.3347	0.0383	0.8743	0.0418	0.9161	0.2397	0.0400	0.2796		4,158.9155	4,158.9155	0.2973		4,166.3490
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0954	0.0652	0.7365	2.1500e-003	0.2236	1.8100e-003	0.2254	0.0593	1.6600e-003	0.0610		214.4502	214.4502	6.3100e-003		214.6080
<b>Total</b>	<b>0.5223</b>	<b>13.6417</b>	<b>4.0712</b>	<b>0.0405</b>	<b>1.0978</b>	<b>0.0436</b>	<b>1.1414</b>	<b>0.2989</b>	<b>0.0416</b>	<b>0.3406</b>		<b>4,373.3657</b>	<b>4,373.3657</b>	<b>0.3037</b>		<b>4,380.9570</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	lb/day										lb/day					
Fugitive Dust					5.4199	0.0000	5.4199	2.9792	0.0000	2.9792			0.0000			0.0000
Off-Road	2.4673	25.7342	12.5960	0.0233		1.2885	1.2885		1.1854	1.1854	0.0000	2,256.5045	2,256.5045	0.7298		2,274.7495

<b>Total</b>	<b>2.4673</b>	<b>25.7342</b>	<b>12.5960</b>	<b>0.0233</b>	<b>5.4199</b>	<b>1.2885</b>	<b>6.7083</b>	<b>2.9792</b>	<b>1.1854</b>	<b>4.1646</b>	<b>0.0000</b>	<b>2,256.5045</b>	<b>2,256.5045</b>	<b>0.7298</b>		<b>2,274.7495</b>
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**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.4269	13.5765	3.3347	0.0383	0.8743	0.0418	0.9161	0.2397	0.0400	0.2796		4,158.9155	4,158.9155	0.2973		4,166.3490
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0954	0.0652	0.7365	2.1500e-003	0.2236	1.8100e-003	0.2254	0.0593	1.6600e-003	0.0610		214.4502	214.4502	6.3100e-003		214.6080
<b>Total</b>	<b>0.5223</b>	<b>13.6417</b>	<b>4.0712</b>	<b>0.0405</b>	<b>1.0978</b>	<b>0.0436</b>	<b>1.1414</b>	<b>0.2989</b>	<b>0.0416</b>	<b>0.3406</b>		<b>4,373.3657</b>	<b>4,373.3657</b>	<b>0.3037</b>		<b>4,380.9570</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	lb/day										lb/day					
Fugitive Dust					14.1652	0.0000	14.1652	6.8495	0.0000	6.8495			0.0000			0.0000
Off-Road	3.9516	43.3481	22.0849	0.0474		1.8977	1.8977		1.7459	1.7459		4,590.5274	4,590.5274	1.4847		4,627.6442
<b>Total</b>	<b>3.9516</b>	<b>43.3481</b>	<b>22.0849</b>	<b>0.0474</b>	<b>14.1652</b>	<b>1.8977</b>	<b>16.0628</b>	<b>6.8495</b>	<b>1.7459</b>	<b>8.5953</b>		<b>4,590.5274</b>	<b>4,590.5274</b>	<b>1.4847</b>		<b>4,627.6442</b>

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.2135	6.7882	1.6673	0.0192	0.4371	0.0209	0.4580	0.1198	0.0200	0.1398		2,079.4577	2,079.4577	0.1487		2,083.1745
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0954	0.0652	0.7365	2.1500e-003	0.2236	1.8100e-003	0.2254	0.0593	1.6600e-003	0.0610		214.4502	214.4502	6.3100e-003		214.6080
<b>Total</b>	<b>0.3088</b>	<b>6.8535</b>	<b>2.4038</b>	<b>0.0213</b>	<b>0.6607</b>	<b>0.0227</b>	<b>0.6834</b>	<b>0.1791</b>	<b>0.0217</b>	<b>0.2008</b>		<b>2,293.9080</b>	<b>2,293.9080</b>	<b>0.1550</b>		<b>2,297.7825</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	lb/day										lb/day					
Fugitive Dust					6.3743	0.0000	6.3743	3.0823	0.0000	3.0823			0.0000			0.0000
Off-Road	3.9516	43.3481	22.0849	0.0474		1.8977	1.8977		1.7459	1.7459	0.0000	4,590.5274	4,590.5274	1.4847		4,627.6442
<b>Total</b>	<b>3.9516</b>	<b>43.3481</b>	<b>22.0849</b>	<b>0.0474</b>	<b>6.3743</b>	<b>1.8977</b>	<b>8.2720</b>	<b>3.0823</b>	<b>1.7459</b>	<b>4.8281</b>	<b>0.0000</b>	<b>4,590.5274</b>	<b>4,590.5274</b>	<b>1.4847</b>		<b>4,627.6442</b>

**Mitigated Construction Off-Site**

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



Hauling	0.2135	6.7882	1.6673	0.0192	0.4371	0.0209	0.4580	0.1198	0.0200	0.1398		2,079.4577	2,079.4577	0.1487		2,083.1745
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0954	0.0652	0.7365	2.1500e-003	0.2236	1.8100e-003	0.2254	0.0593	1.6600e-003	0.0610		214.4502	214.4502	6.3100e-003		214.6080
<b>Total</b>	<b>0.3088</b>	<b>6.8535</b>	<b>2.4038</b>	<b>0.0213</b>	<b>0.6607</b>	<b>0.0227</b>	<b>0.6834</b>	<b>0.1791</b>	<b>0.0217</b>	<b>0.2008</b>		<b>2,293.9080</b>	<b>2,293.9080</b>	<b>0.1550</b>		<b>2,297.7825</b>

### 3.5 Building Construction - 2021

#### Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.1067	12.5424	7.3561	0.0162		0.5614	0.5614		0.5165	0.5165		1,568.8276	1,568.8276	0.5074		1,581.5124
<b>Total</b>	<b>1.1067</b>	<b>12.5424</b>	<b>7.3561</b>	<b>0.0162</b>		<b>0.5614</b>	<b>0.5614</b>		<b>0.5165</b>	<b>0.5165</b>		<b>1,568.8276</b>	<b>1,568.8276</b>	<b>0.5074</b>		<b>1,581.5124</b>

#### Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	4.2700e-003	0.1358	0.0334	3.8000e-004	8.7400e-003	4.2000e-004	9.1600e-003	2.4000e-003	4.0000e-004	2.8000e-003		41.5892	41.5892	2.9700e-003		41.6635
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.1907	0.1305	1.4730	4.3000e-003	0.4471	3.6100e-003	0.4507	0.1186	3.3300e-003	0.1219		428.9004	428.9004	0.0126		429.2160
<b>Total</b>	<b>0.1950</b>	<b>0.2662</b>	<b>1.5064</b>	<b>4.6800e-003</b>	<b>0.4559</b>	<b>4.0300e-003</b>	<b>0.4599</b>	<b>0.1210</b>	<b>3.7300e-003</b>	<b>0.1247</b>		<b>470.4896</b>	<b>470.4896</b>	<b>0.0156</b>		<b>470.8795</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	lb/day										lb/day					
Off-Road	1.1067	12.5424	7.3561	0.0162		0.5614	0.5614		0.5165	0.5165	0.0000	1,568.8276	1,568.8276	0.5074		1,581.5124
<b>Total</b>	<b>1.1067</b>	<b>12.5424</b>	<b>7.3561</b>	<b>0.0162</b>		<b>0.5614</b>	<b>0.5614</b>		<b>0.5165</b>	<b>0.5165</b>	<b>0.0000</b>	<b>1,568.8276</b>	<b>1,568.8276</b>	<b>0.5074</b>		<b>1,581.5124</b>

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	4.2700e-003	0.1358	0.0334	3.8000e-004	8.7400e-003	4.2000e-004	9.1600e-003	2.4000e-003	4.0000e-004	2.8000e-003		41.5892	41.5892	2.9700e-003		41.6635
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.1907	0.1305	1.4730	4.3000e-003	0.4471	3.6100e-003	0.4507	0.1186	3.3300e-003	0.1219		428.9004	428.9004	0.0126		429.2160
<b>Total</b>	<b>0.1950</b>	<b>0.2662</b>	<b>1.5064</b>	<b>4.6800e-003</b>	<b>0.4559</b>	<b>4.0300e-003</b>	<b>0.4599</b>	<b>0.1210</b>	<b>3.7300e-003</b>	<b>0.1247</b>		<b>470.4896</b>	<b>470.4896</b>	<b>0.0156</b>		<b>470.8795</b>

**3.6 Paving - 2021**

**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.8766	9.0706	10.8924	0.0176		0.4425	0.4425		0.4071	0.4071		1,699.0331	1,699.0331	0.5495		1,712.7707
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
<b>Total</b>	<b>0.8766</b>	<b>9.0706</b>	<b>10.8924</b>	<b>0.0176</b>		<b>0.4425</b>	<b>0.4425</b>		<b>0.4071</b>	<b>0.4071</b>		<b>1,699.0331</b>	<b>1,699.0331</b>	<b>0.5495</b>		<b>1,712.7707</b>

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0854	2.7153	0.6669	7.6700e-003	0.1749	8.3600e-003	0.1832	0.0479	8.0000e-003	0.0559		831.7831	831.7831	0.0595		833.2698
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0954	0.0652	0.7365	2.1500e-003	0.2236	1.8100e-003	0.2254	0.0593	1.6600e-003	0.0610		214.4502	214.4502	6.3100e-003		214.6080
<b>Total</b>	<b>0.1808</b>	<b>2.7805</b>	<b>1.4034</b>	<b>9.8200e-003</b>	<b>0.3984</b>	<b>0.0102</b>	<b>0.4086</b>	<b>0.1072</b>	<b>9.6600e-003</b>	<b>0.1169</b>		<b>1,046.2333</b>	<b>1,046.2333</b>	<b>0.0658</b>		<b>1,047.8778</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	lb/day										lb/day					
Off-Road	0.8766	9.0706	10.8924	0.0176		0.4425	0.4425		0.4071	0.4071	0.0000	1,699.0331	1,699.0331	0.5495		1,712.7706

Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
<b>Total</b>	<b>0.8766</b>	<b>9.0706</b>	<b>10.8924</b>	<b>0.0176</b>		<b>0.4425</b>	<b>0.4425</b>		<b>0.4071</b>	<b>0.4071</b>	<b>0.0000</b>	<b>1,699.0331</b>	<b>1,699.0331</b>	<b>0.5495</b>		<b>1,712.7706</b>

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0854	2.7153	0.6669	7.6700e-003	0.1749	8.3600e-003	0.1832	0.0479	8.0000e-003	0.0559		831.7831	831.7831	0.0595		833.2698
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0954	0.0652	0.7365	2.1500e-003	0.2236	1.8100e-003	0.2254	0.0593	1.6600e-003	0.0610		214.4502	214.4502	6.3100e-003		214.6080
<b>Total</b>	<b>0.1808</b>	<b>2.7805</b>	<b>1.4034</b>	<b>9.8200e-003</b>	<b>0.3984</b>	<b>0.0102</b>	<b>0.4086</b>	<b>0.1072</b>	<b>9.6600e-003</b>	<b>0.1169</b>		<b>1,046.2333</b>	<b>1,046.2333</b>	<b>0.0658</b>		<b>1,047.8778</b>

**3.7 Architectural Coating - 2021**

**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	1.1675	8.1432	9.6936	0.0159		0.5019	0.5019		0.5019	0.5019		1,501.0563	1,501.0563	0.1030		1,503.6315
<b>Total</b>	<b>1.1675</b>	<b>8.1432</b>	<b>9.6936</b>	<b>0.0159</b>		<b>0.5019</b>	<b>0.5019</b>		<b>0.5019</b>	<b>0.5019</b>		<b>1,501.0563</b>	<b>1,501.0563</b>	<b>0.1030</b>		<b>1,503.6315</b>

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0854	2.7153	0.6669	7.6700e-003	0.1749	8.3600e-003	0.1832	0.0479	8.0000e-003	0.0559		831.7831	831.7831	0.0595		833.2698
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0954	0.0652	0.7365	2.1500e-003	0.2236	1.8100e-003	0.2254	0.0593	1.6600e-003	0.0610		214.4502	214.4502	6.3100e-003		214.6080
<b>Total</b>	<b>0.1808</b>	<b>2.7805</b>	<b>1.4034</b>	<b>9.8200e-003</b>	<b>0.3984</b>	<b>0.0102</b>	<b>0.4086</b>	<b>0.1072</b>	<b>9.6600e-003</b>	<b>0.1169</b>		<b>1,046.2333</b>	<b>1,046.2333</b>	<b>0.0658</b>		<b>1,047.8778</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	lb/day										lb/day					
Archit. Coating	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	1.1675	8.1432	9.6936	0.0159		0.5019	0.5019		0.5019	0.5019	0.0000	1,501.0563	1,501.0563	0.1030		1,503.6315
<b>Total</b>	<b>1.1675</b>	<b>8.1432</b>	<b>9.6936</b>	<b>0.0159</b>		<b>0.5019</b>	<b>0.5019</b>		<b>0.5019</b>	<b>0.5019</b>	<b>0.0000</b>	<b>1,501.0563</b>	<b>1,501.0563</b>	<b>0.1030</b>		<b>1,503.6315</b>

**Mitigated Construction Off-Site**

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

Hauling	0.0854	2.7153	0.6669	7.6700e-003	0.1749	8.3600e-003	0.1832	0.0479	8.0000e-003	0.0559		831.7831	831.7831	0.0595		833.2698
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0954	0.0652	0.7365	2.1500e-003	0.2236	1.8100e-003	0.2254	0.0593	1.6600e-003	0.0610		214.4502	214.4502	6.3100e-003		214.6080
<b>Total</b>	<b>0.1808</b>	<b>2.7805</b>	<b>1.4034</b>	<b>9.8200e-003</b>	<b>0.3984</b>	<b>0.0102</b>	<b>0.4086</b>	<b>0.1072</b>	<b>9.6600e-003</b>	<b>0.1169</b>		<b>1,046.2333</b>	<b>1,046.2333</b>	<b>0.0658</b>		<b>1,047.8778</b>

Sample Scenario - 8 Pieces of Equipment, 100 Truck Trips - Los Angeles-South Coast County, Summer

**Sample Scenario - 8 Pieces of Equipment, 100 Truck Trips  
Los Angeles-South Coast County, Summer**

**1.0 Project Characteristics**

**1.1 Land Usage**

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Apartments Low Rise	10.00	Dwelling Unit	0.63	10,000.00	29

**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>	11	<b>Operational Year</b>	2021		
<b>Utility Company</b>	Southern California Edison				
<b>CO2 Intensity (lb/MW hr)</b>	702.44	<b>CH4 Intensity (lb/MW hr)</b>	0.029	<b>N2O Intensity (lb/MW hr)</b>	0.006

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

Table Name	Column Name	Default Value	New Value
tblArchitecturalCoating	ConstArea_Residential_Exterior	6,750.00	0.00
tblArchitecturalCoating	ConstArea_Residential_Interior	20,250.00	0.00
tblConstDustMitigation	WaterUnpavedRoadVehicleSpeed	0	15
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	8.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	4.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00

tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	3.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	4.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	4.00
tblOffRoadEquipment	UsageHours	6.00	8.00
tblOffRoadEquipment	UsageHours	4.00	8.00
tblOffRoadEquipment	UsageHours	7.00	8.00
tblOffRoadEquipment	UsageHours	7.00	6.00
tblOffRoadEquipment	UsageHours	1.00	8.00
tblOffRoadEquipment	UsageHours	1.00	8.00
tblOffRoadEquipment	UsageHours	8.00	6.00
tblOffRoadEquipment	UsageHours	6.00	8.00
tblTripsAndVMT	HaulingTripNumber	0.00	100.00
tblTripsAndVMT	HaulingTripNumber	0.00	100.00
tblTripsAndVMT	HaulingTripNumber	0.00	100.00
tblTripsAndVMT	HaulingTripNumber	0.00	100.00
tblTripsAndVMT	HaulingTripNumber	0.00	100.00
tblTripsAndVMT	HaulingTripNumber	0.00	100.00
tblTripsAndVMT	VendorTripNumber	1.00	0.00
tblTripsAndVMT	WorkerTripNumber	20.00	40.00
tblTripsAndVMT	WorkerTripNumber	7.00	80.00
tblTripsAndVMT	WorkerTripNumber	20.00	40.00
tblTripsAndVMT	WorkerTripNumber	1.00	40.00
tblTripsAndVMT	WorkerTripNumber	20.00	40.00
tblTripsAndVMT	WorkerTripNumber	20.00	40.00

## 2.0 Emissions Summary

### 2.1 Overall Construction (Maximum Daily Emission)

#### Unmitigated Construction





1	Demolition	Demolition	1/1/2021	1/14/2021	5	10
2	Site Preparation	Site Preparation	1/15/2021	1/15/2021	5	1
3	Grading	Grading	1/16/2021	1/19/2021	5	2
4	Building Construction	Building Construction	1/20/2021	6/8/2021	5	100
5	Paving	Paving	6/9/2021	6/15/2021	5	5
6	Architectural Coating	Architectural Coating	6/16/2021	6/22/2021	5	5

**Acres of Grading (Site Preparation Phase): 0**

**Acres of Grading (Grading Phase): 4**

**Acres of Paving: 0**

**Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0**

**OffRoad Equipment**

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Grading	Excavators	2	8.00	158	0.38
Grading	Rubber Tired Dozers	2	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	2	8.00	231	0.29
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	4	6.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Paving	Cement and Mortar Mixers	2	6.00	9	0.56
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	6.00	80	0.38
Architectural Coating	Air Compressors	8	8.00	78	0.48
Demolition	Concrete/Industrial Saws	2	8.00	81	0.73
Demolition	Excavators	3	8.00	158	0.38
Demolition	Rubber Tired Dozers	3	8.00	247	0.40

Site Preparation	Rubber Tired Dozers	4	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37

### Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Grading	8	40.00	0.00	100.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	8	80.00	0.00	100.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	8	40.00	0.00	100.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	8	40.00	0.00	100.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Demolition	8	40.00	0.00	100.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	8	40.00	0.00	100.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

### 3.1 Mitigation Measures Construction

Water Exposed Area

Reduce Vehicle Speed on Unpaved Roads

### 3.2 Demolition - 2021

#### Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	4.5963	45.4499	29.2769	0.0536		2.2569	2.2569		2.1041	2.1041		5,167.9618	5,167.9618	1.3569		5,201.8841
<b>Total</b>	<b>4.5963</b>	<b>45.4499</b>	<b>29.2769</b>	<b>0.0536</b>		<b>2.2569</b>	<b>2.2569</b>		<b>2.1041</b>	<b>2.1041</b>		<b>5,167.9618</b>	<b>5,167.9618</b>	<b>1.3569</b>		<b>5,201.8841</b>

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0834	2.6824	0.6290	7.8000e-003	0.1749	8.2300e-003	0.1831	0.0479	7.8800e-003	0.0558		846.4463	846.4463	0.0574		847.8823
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.1715	0.1179	1.6111	4.5700e-003	0.4471	3.6100e-003	0.4507	0.1186	3.3300e-003	0.1219		455.5079	455.5079	0.0134		455.8435
<b>Total</b>	<b>0.2548</b>	<b>2.8003</b>	<b>2.2401</b>	<b>0.0124</b>	<b>0.6220</b>	<b>0.0118</b>	<b>0.6338</b>	<b>0.1665</b>	<b>0.0112</b>	<b>0.1777</b>		<b>1,301.9542</b>	<b>1,301.9542</b>	<b>0.0709</b>		<b>1,303.7258</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	lb/day										lb/day					
Off-Road	4.5963	45.4499	29.2769	0.0536		2.2569	2.2569		2.1041	2.1041	0.0000	5,167.9618	5,167.9618	1.3569		5,201.8841
<b>Total</b>	<b>4.5963</b>	<b>45.4499</b>	<b>29.2769</b>	<b>0.0536</b>		<b>2.2569</b>	<b>2.2569</b>		<b>2.1041</b>	<b>2.1041</b>	<b>0.0000</b>	<b>5,167.9618</b>	<b>5,167.9618</b>	<b>1.3569</b>		<b>5,201.8841</b>

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
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Category	lb/day										lb/day				
Hauling	0.0834	2.6824	0.6290	7.8000e-003	0.1749	8.2300e-003	0.1831	0.0479	7.8800e-003	0.0558		846.4463	846.4463	0.0574	847.8823
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000
Worker	0.1715	0.1179	1.6111	4.5700e-003	0.4471	3.6100e-003	0.4507	0.1186	3.3300e-003	0.1219		455.5079	455.5079	0.0134	455.8435
<b>Total</b>	<b>0.2548</b>	<b>2.8003</b>	<b>2.2401</b>	<b>0.0124</b>	<b>0.6220</b>	<b>0.0118</b>	<b>0.6338</b>	<b>0.1665</b>	<b>0.0112</b>	<b>0.1777</b>		<b>1,301.9542</b>	<b>1,301.9542</b>	<b>0.0709</b>	<b>1,303.7258</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	lb/day										lb/day					
Fugitive Dust					24.0883	0.0000	24.0883	13.2409	0.0000	13.2409			0.0000			0.0000
Off-Road	4.9345	51.4684	25.1920	0.0466		2.5769	2.5769		2.3708	2.3708		4,513.0091	4,513.0091	1.4596		4,549.4990
<b>Total</b>	<b>4.9345</b>	<b>51.4684</b>	<b>25.1920</b>	<b>0.0466</b>	<b>24.0883</b>	<b>2.5769</b>	<b>26.6653</b>	<b>13.2409</b>	<b>2.3708</b>	<b>15.6117</b>		<b>4,513.0091</b>	<b>4,513.0091</b>	<b>1.4596</b>		<b>4,549.4990</b>

#### Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.8338	26.8244	6.2895	0.0780	1.7485	0.0823	1.8309	0.4793	0.0788	0.5581		8,464.4627	8,464.4627	0.5744		8,478.8234
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.1715	0.1179	1.6111	4.5700e-003	0.4471	3.6100e-003	0.4507	0.1186	3.3300e-003	0.1219		455.5079	455.5079	0.0134		455.8435

Total	1.0053	26.9422	7.9006	0.0826	2.1957	0.0859	2.2816	0.5979	0.0821	0.6800		8,919.9706	8,919.9706	0.5879		8,934.6669
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**Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					10.8398	0.0000	10.8398	5.9584	0.0000	5.9584			0.0000			0.0000
Off-Road	4.9345	51.4684	25.1920	0.0466		2.5769	2.5769		2.3708	2.3708	0.0000	4,513.0091	4,513.0091	1.4596		4,549.4990
<b>Total</b>	<b>4.9345</b>	<b>51.4684</b>	<b>25.1920</b>	<b>0.0466</b>	<b>10.8398</b>	<b>2.5769</b>	<b>13.4167</b>	<b>5.9584</b>	<b>2.3708</b>	<b>8.3292</b>	<b>0.0000</b>	<b>4,513.0091</b>	<b>4,513.0091</b>	<b>1.4596</b>		<b>4,549.4990</b>

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.8338	26.8244	6.2895	0.0780	1.7485	0.0823	1.8309	0.4793	0.0788	0.5581		8,464.4627	8,464.4627	0.5744		8,478.8234
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.1715	0.1179	1.6111	4.5700e-003	0.4471	3.6100e-003	0.4507	0.1186	3.3300e-003	0.1219		455.5079	455.5079	0.0134		455.8435
<b>Total</b>	<b>1.0053</b>	<b>26.9422</b>	<b>7.9006</b>	<b>0.0826</b>	<b>2.1957</b>	<b>0.0859</b>	<b>2.2816</b>	<b>0.5979</b>	<b>0.0821</b>	<b>0.6800</b>		<b>8,919.9706</b>	<b>8,919.9706</b>	<b>0.5879</b>		<b>8,934.6669</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	lb/day										lb/day					
Fugitive Dust					14.1652	0.0000	14.1652	6.8495	0.0000	6.8495			0.0000			0.0000
Off-Road	4.7846	51.4466	33.1490	0.0639		2.3301	2.3301		2.1437	2.1437		6,192.7115	6,192.7115	2.0029		6,242.7827
<b>Total</b>	<b>4.7846</b>	<b>51.4466</b>	<b>33.1490</b>	<b>0.0639</b>	<b>14.1652</b>	<b>2.3301</b>	<b>16.4953</b>	<b>6.8495</b>	<b>2.1437</b>	<b>8.9932</b>		<b>6,192.7115</b>	<b>6,192.7115</b>	<b>2.0029</b>		<b>6,242.7827</b>

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.4169	13.4122	3.1448	0.0390	0.8743	0.0412	0.9154	0.2397	0.0394	0.2790		4,232.2314	4,232.2314	0.2872		4,239.4117
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.1715	0.1179	1.6111	4.5700e-003	0.4471	3.6100e-003	0.4507	0.1186	3.3300e-003	0.1219		455.5079	455.5079	0.0134		455.8435
<b>Total</b>	<b>0.5884</b>	<b>13.5300</b>	<b>4.7559</b>	<b>0.0436</b>	<b>1.3214</b>	<b>0.0448</b>	<b>1.3662</b>	<b>0.3582</b>	<b>0.0427</b>	<b>0.4009</b>		<b>4,687.7393</b>	<b>4,687.7393</b>	<b>0.3006</b>		<b>4,695.2552</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	lb/day										lb/day					

Fugitive Dust					6.3743	0.0000	6.3743	3.0823	0.0000	3.0823			0.0000			0.0000
Off-Road	4.7846	51.4466	33.1490	0.0639		2.3301	2.3301		2.1437	2.1437	0.0000	6,192.7115	6,192.7115	2.0029		6,242.7827
<b>Total</b>	<b>4.7846</b>	<b>51.4466</b>	<b>33.1490</b>	<b>0.0639</b>	<b>6.3743</b>	<b>2.3301</b>	<b>8.7044</b>	<b>3.0823</b>	<b>2.1437</b>	<b>5.2260</b>	<b>0.0000</b>	<b>6,192.7115</b>	<b>6,192.7115</b>	<b>2.0029</b>		<b>6,242.7827</b>

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.4169	13.4122	3.1448	0.0390	0.8743	0.0412	0.9154	0.2397	0.0394	0.2790		4,232.2314	4,232.2314	0.2872		4,239.4117
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.1715	0.1179	1.6111	4.5700e-003	0.4471	3.6100e-003	0.4507	0.1186	3.3300e-003	0.1219		455.5079	455.5079	0.0134		455.8435
<b>Total</b>	<b>0.5884</b>	<b>13.5300</b>	<b>4.7559</b>	<b>0.0436</b>	<b>1.3214</b>	<b>0.0448</b>	<b>1.3662</b>	<b>0.3582</b>	<b>0.0427</b>	<b>0.4009</b>		<b>4,687.7393</b>	<b>4,687.7393</b>	<b>0.3006</b>		<b>4,695.2552</b>

**3.5 Building Construction - 2021**

**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.0477	20.0612	16.1499	0.0300		0.9709	0.9709		0.9126	0.9126		2,850.6901	2,850.6901	0.7122		2,868.4944
<b>Total</b>	<b>2.0477</b>	<b>20.0612</b>	<b>16.1499</b>	<b>0.0300</b>		<b>0.9709</b>	<b>0.9709</b>		<b>0.9126</b>	<b>0.9126</b>		<b>2,850.6901</b>	<b>2,850.6901</b>	<b>0.7122</b>		<b>2,868.4944</b>



**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	8.3400e-003	0.2682	0.0629	7.8000e-004	0.0175	8.2000e-004	0.0183	4.7900e-003	7.9000e-004	5.5800e-003		84.6446	84.6446	5.7400e-003		84.7882
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.3429	0.2357	3.2222	9.1500e-003	0.8942	7.2300e-003	0.9014	0.2372	6.6600e-003	0.2438		911.0159	911.0159	0.0268		911.6870
<b>Total</b>	<b>0.3513</b>	<b>0.5040</b>	<b>3.2851</b>	<b>9.9300e-003</b>	<b>0.9117</b>	<b>8.0500e-003</b>	<b>0.9198</b>	<b>0.2419</b>	<b>7.4500e-003</b>	<b>0.2494</b>		<b>995.6605</b>	<b>995.6605</b>	<b>0.0326</b>		<b>996.4752</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	lb/day										lb/day					
Off-Road	2.0477	20.0612	16.1499	0.0300		0.9709	0.9709		0.9126	0.9126	0.0000	2,850.6900	2,850.6900	0.7122		2,868.4944
<b>Total</b>	<b>2.0477</b>	<b>20.0612</b>	<b>16.1499</b>	<b>0.0300</b>		<b>0.9709</b>	<b>0.9709</b>		<b>0.9126</b>	<b>0.9126</b>	<b>0.0000</b>	<b>2,850.6900</b>	<b>2,850.6900</b>	<b>0.7122</b>		<b>2,868.4944</b>

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
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Category	lb/day										lb/day					
Hauling	8.3400e-003	0.2682	0.0629	7.8000e-004	0.0175	8.2000e-004	0.0183	4.7900e-003	7.9000e-004	5.5800e-003		84.6446	84.6446	5.7400e-003		84.7882
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.3429	0.2357	3.2222	9.1500e-003	0.8942	7.2300e-003	0.9014	0.2372	6.6600e-003	0.2438		911.0159	911.0159	0.0268		911.6870
<b>Total</b>	<b>0.3513</b>	<b>0.5040</b>	<b>3.2851</b>	<b>9.9300e-003</b>	<b>0.9117</b>	<b>8.0500e-003</b>	<b>0.9198</b>	<b>0.2419</b>	<b>7.4500e-003</b>	<b>0.2494</b>		<b>995.6605</b>	<b>995.6605</b>	<b>0.0326</b>		<b>996.4752</b>

### 3.6 Paving - 2021

#### Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.2489	12.5093	14.1756	0.0226		0.6404	0.6404		0.5909	0.5909		2,155.9409	2,155.9409	0.6806		2,172.9568
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
<b>Total</b>	<b>1.2489</b>	<b>12.5093</b>	<b>14.1756</b>	<b>0.0226</b>		<b>0.6404</b>	<b>0.6404</b>		<b>0.5909</b>	<b>0.5909</b>		<b>2,155.9409</b>	<b>2,155.9409</b>	<b>0.6806</b>		<b>2,172.9568</b>

#### Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.1668	5.3649	1.2579	0.0156	0.3497	0.0165	0.3662	0.0959	0.0158	0.1116		1,692.8925	1,692.8925	0.1149		1,695.7647
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.1715	0.1179	1.6111	4.5700e-003	0.4471	3.6100e-003	0.4507	0.1186	3.3300e-003	0.1219		455.5079	455.5079	0.0134		455.8435

<b>Total</b>	<b>0.3382</b>	<b>5.4827</b>	<b>2.8690</b>	<b>0.0202</b>	<b>0.7968</b>	<b>0.0201</b>	<b>0.8169</b>	<b>0.2144</b>	<b>0.0191</b>	<b>0.2335</b>		<b>2,148.4005</b>	<b>2,148.4005</b>	<b>0.1283</b>		<b>2,151.6082</b>
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**Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
<b>Category</b>	<b>lb/day</b>										<b>lb/day</b>					
Off-Road	1.2489	12.5093	14.1756	0.0226		0.6404	0.6404		0.5909	0.5909	0.0000	2,155.9409	2,155.9409	0.6806		2,172.9568
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
<b>Total</b>	<b>1.2489</b>	<b>12.5093</b>	<b>14.1756</b>	<b>0.0226</b>		<b>0.6404</b>	<b>0.6404</b>		<b>0.5909</b>	<b>0.5909</b>	<b>0.0000</b>	<b>2,155.9409</b>	<b>2,155.9409</b>	<b>0.6806</b>		<b>2,172.9568</b>

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
<b>Category</b>	<b>lb/day</b>										<b>lb/day</b>					
Hauling	0.1668	5.3649	1.2579	0.0156	0.3497	0.0165	0.3662	0.0959	0.0158	0.1116		1,692.8925	1,692.8925	0.1149		1,695.7647
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.1715	0.1179	1.6111	4.5700e-003	0.4471	3.6100e-003	0.4507	0.1186	3.3300e-003	0.1219		455.5079	455.5079	0.0134		455.8435
<b>Total</b>	<b>0.3382</b>	<b>5.4827</b>	<b>2.8690</b>	<b>0.0202</b>	<b>0.7968</b>	<b>0.0201</b>	<b>0.8169</b>	<b>0.2144</b>	<b>0.0191</b>	<b>0.2335</b>		<b>2,148.4005</b>	<b>2,148.4005</b>	<b>0.1283</b>		<b>2,151.6082</b>

**3.7 Architectural Coating - 2021**

**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	2.3349	16.2863	19.3873	0.0317		1.0037	1.0037		1.0037	1.0037		3,002.1125	3,002.1125	0.2060		3,007.2631
<b>Total</b>	<b>2.3349</b>	<b>16.2863</b>	<b>19.3873</b>	<b>0.0317</b>		<b>1.0037</b>	<b>1.0037</b>		<b>1.0037</b>	<b>1.0037</b>		<b>3,002.1125</b>	<b>3,002.1125</b>	<b>0.2060</b>		<b>3,007.2631</b>

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.1668	5.3649	1.2579	0.0156	0.3497	0.0165	0.3662	0.0959	0.0158	0.1116		1,692.8925	1,692.8925	0.1149		1,695.7647
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.1715	0.1179	1.6111	4.5700e-003	0.4471	3.6100e-003	0.4507	0.1186	3.3300e-003	0.1219		455.5079	455.5079	0.0134		455.8435
<b>Total</b>	<b>0.3382</b>	<b>5.4827</b>	<b>2.8690</b>	<b>0.0202</b>	<b>0.7968</b>	<b>0.0201</b>	<b>0.8169</b>	<b>0.2144</b>	<b>0.0191</b>	<b>0.2335</b>		<b>2,148.4005</b>	<b>2,148.4005</b>	<b>0.1283</b>		<b>2,151.6082</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	lb/day										lb/day					

Archit. Coating	0.0000					0.0000	0.0000		0.0000	0.0000		0.0000			0.0000
Off-Road	2.3349	16.2863	19.3873	0.0317		1.0037	1.0037		1.0037	1.0037	0.0000	3,002.1125	3,002.1125	0.2060	3,007.2631
<b>Total</b>	<b>2.3349</b>	<b>16.2863</b>	<b>19.3873</b>	<b>0.0317</b>		<b>1.0037</b>	<b>1.0037</b>		<b>1.0037</b>	<b>1.0037</b>	<b>0.0000</b>	<b>3,002.1125</b>	<b>3,002.1125</b>	<b>0.2060</b>	<b>3,007.2631</b>

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.1668	5.3649	1.2579	0.0156	0.3497	0.0165	0.3662	0.0959	0.0158	0.1116		1,692.8925	1,692.8925	0.1149		1,695.7647
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.1715	0.1179	1.6111	4.5700e-003	0.4471	3.6100e-003	0.4507	0.1186	3.3300e-003	0.1219		455.5079	455.5079	0.0134		455.8435
<b>Total</b>	<b>0.3382</b>	<b>5.4827</b>	<b>2.8690</b>	<b>0.0202</b>	<b>0.7968</b>	<b>0.0201</b>	<b>0.8169</b>	<b>0.2144</b>	<b>0.0191</b>	<b>0.2335</b>		<b>2,148.4005</b>	<b>2,148.4005</b>	<b>0.1283</b>		<b>2,151.6082</b>

Sample Scenario - 8 Pieces of Equipment, 100 Truck Trips - Los Angeles-South Coast County, Winter

**Sample Scenario - 8 Pieces of Equipment, 100 Truck Trips  
Los Angeles-South Coast County, Winter**

**1.0 Project Characteristics**

**1.1 Land Usage**

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Apartments Low Rise	10.00	Dwelling Unit	0.63	10,000.00	29

**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>	11	<b>Operational Year</b>	2021		
<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**

Table Name	Column Name	Default Value	New Value
tblArchitecturalCoating	ConstArea_Residential_Exterior	6,750.00	0.00
tblArchitecturalCoating	ConstArea_Residential_Interior	20,250.00	0.00
tblConstDustMitigation	WaterUnpavedRoadVehicleSpeed	0	15
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	8.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	4.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00

tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	3.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	4.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	4.00
tblOffRoadEquipment	UsageHours	6.00	8.00
tblOffRoadEquipment	UsageHours	4.00	8.00
tblOffRoadEquipment	UsageHours	7.00	8.00
tblOffRoadEquipment	UsageHours	7.00	6.00
tblOffRoadEquipment	UsageHours	1.00	8.00
tblOffRoadEquipment	UsageHours	1.00	8.00
tblOffRoadEquipment	UsageHours	8.00	6.00
tblOffRoadEquipment	UsageHours	6.00	8.00
tblTripsAndVMT	HaulingTripNumber	0.00	100.00
tblTripsAndVMT	HaulingTripNumber	0.00	100.00
tblTripsAndVMT	HaulingTripNumber	0.00	100.00
tblTripsAndVMT	HaulingTripNumber	0.00	100.00
tblTripsAndVMT	HaulingTripNumber	0.00	100.00
tblTripsAndVMT	HaulingTripNumber	0.00	100.00
tblTripsAndVMT	VendorTripNumber	1.00	0.00
tblTripsAndVMT	WorkerTripNumber	20.00	40.00
tblTripsAndVMT	WorkerTripNumber	7.00	80.00
tblTripsAndVMT	WorkerTripNumber	20.00	40.00
tblTripsAndVMT	WorkerTripNumber	1.00	40.00
tblTripsAndVMT	WorkerTripNumber	20.00	40.00
tblTripsAndVMT	WorkerTripNumber	20.00	40.00

## 2.0 Emissions Summary

### 2.1 Overall Construction (Maximum Daily Emission)

#### Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	5.9791	78.7518	37.9567	0.1275	26.2840	2.6641	28.9481	13.8388	2.4541	16.2928	0.0000	13,259.7405	13,259.7405	2.3128	0.0000	13,311.4130
<b>Maximum</b>	<b>5.9791</b>	<b>78.7518</b>	<b>37.9567</b>	<b>0.1275</b>	<b>26.2840</b>	<b>2.6641</b>	<b>28.9481</b>	<b>13.8388</b>	<b>2.4541</b>	<b>16.2928</b>	<b>0.0000</b>	<b>13,259.7405</b>	<b>13,259.7405</b>	<b>2.3128</b>	<b>0.0000</b>	<b>13,311.4130</b>

### Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	5.9791	78.7518	37.9567	0.1275	13.0354	2.6641	15.6995	6.5563	2.4541	9.0103	0.0000	13,259.7405	13,259.7405	2.3128	0.0000	13,311.4130
<b>Maximum</b>	<b>5.9791</b>	<b>78.7518</b>	<b>37.9567</b>	<b>0.1275</b>	<b>13.0354</b>	<b>2.6641</b>	<b>15.6995</b>	<b>6.5563</b>	<b>2.4541</b>	<b>9.0103</b>	<b>0.0000</b>	<b>13,259.7405</b>	<b>13,259.7405</b>	<b>2.3128</b>	<b>0.0000</b>	<b>13,311.4130</b>

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
<b>Percent Reduction</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>50.41</b>	<b>0.00</b>	<b>45.77</b>	<b>52.62</b>	<b>0.00</b>	<b>44.70</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>

## 3.0 Construction Detail

### Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
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1	Demolition	Demolition	1/1/2021	1/14/2021	5	10
2	Site Preparation	Site Preparation	1/15/2021	1/15/2021	5	1
3	Grading	Grading	1/16/2021	1/19/2021	5	2
4	Building Construction	Building Construction	1/20/2021	6/8/2021	5	100
5	Paving	Paving	6/9/2021	6/15/2021	5	5
6	Architectural Coating	Architectural Coating	6/16/2021	6/22/2021	5	5

**Acres of Grading (Site Preparation Phase): 0**

**Acres of Grading (Grading Phase): 4**

**Acres of Paving: 0**

**Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0**

**OffRoad Equipment**

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Grading	Excavators	2	8.00	158	0.38
Grading	Rubber Tired Dozers	2	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	2	8.00	231	0.29
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	4	6.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Paving	Cement and Mortar Mixers	2	6.00	9	0.56
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	6.00	80	0.38
Architectural Coating	Air Compressors	8	8.00	78	0.48
Demolition	Concrete/Industrial Saws	2	8.00	81	0.73
Demolition	Excavators	3	8.00	158	0.38
Demolition	Rubber Tired Dozers	3	8.00	247	0.40

Site Preparation	Rubber Tired Dozers	4	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37

### Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Grading	8	40.00	0.00	100.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	8	80.00	0.00	100.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	8	40.00	0.00	100.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	8	40.00	0.00	100.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Demolition	8	40.00	0.00	100.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	8	40.00	0.00	100.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

### 3.1 Mitigation Measures Construction

Water Exposed Area

Reduce Vehicle Speed on Unpaved Roads

### 3.2 Demolition - 2021

#### Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	4.5963	45.4499	29.2769	0.0536		2.2569	2.2569		2.1041	2.1041		5,167.9618	5,167.9618	1.3569		5,201.8841
<b>Total</b>	<b>4.5963</b>	<b>45.4499</b>	<b>29.2769</b>	<b>0.0536</b>		<b>2.2569</b>	<b>2.2569</b>		<b>2.1041</b>	<b>2.1041</b>		<b>5,167.9618</b>	<b>5,167.9618</b>	<b>1.3569</b>		<b>5,201.8841</b>

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0854	2.7153	0.6669	7.6700e-003	0.1749	8.3600e-003	0.1832	0.0479	8.0000e-003	0.0559		831.7831	831.7831	0.0595		833.2698
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.1907	0.1305	1.4730	4.3000e-003	0.4471	3.6100e-003	0.4507	0.1186	3.3300e-003	0.1219		428.9004	428.9004	0.0126		429.2160
<b>Total</b>	<b>0.2761</b>	<b>2.8458</b>	<b>2.1400</b>	<b>0.0120</b>	<b>0.6220</b>	<b>0.0120</b>	<b>0.6339</b>	<b>0.1665</b>	<b>0.0113</b>	<b>0.1778</b>		<b>1,260.6835</b>	<b>1,260.6835</b>	<b>0.0721</b>		<b>1,262.4858</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	lb/day										lb/day					
Off-Road	4.5963	45.4499	29.2769	0.0536		2.2569	2.2569		2.1041	2.1041	0.0000	5,167.9618	5,167.9618	1.3569		5,201.8841
<b>Total</b>	<b>4.5963</b>	<b>45.4499</b>	<b>29.2769</b>	<b>0.0536</b>		<b>2.2569</b>	<b>2.2569</b>		<b>2.1041</b>	<b>2.1041</b>	<b>0.0000</b>	<b>5,167.9618</b>	<b>5,167.9618</b>	<b>1.3569</b>		<b>5,201.8841</b>

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
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Category	lb/day										lb/day				
	Hauling	0.0854	2.7153	0.6669	7.6700e-003	0.1749	8.3600e-003	0.1832	0.0479	8.0000e-003	0.0559	831.7831	831.7831	0.0595	833.2698
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Worker	0.1907	0.1305	1.4730	4.3000e-003	0.4471	3.6100e-003	0.4507	0.1186	3.3300e-003	0.1219	428.9004	428.9004	0.0126	429.2160	
<b>Total</b>	<b>0.2761</b>	<b>2.8458</b>	<b>2.1400</b>	<b>0.0120</b>	<b>0.6220</b>	<b>0.0120</b>	<b>0.6339</b>	<b>0.1665</b>	<b>0.0113</b>	<b>0.1778</b>	<b>1,260.6835</b>	<b>1,260.6835</b>	<b>0.0721</b>	<b>1,262.4858</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	lb/day										lb/day					
Fugitive Dust					24.0883	0.0000	24.0883	13.2409	0.0000	13.2409			0.0000			0.0000
Off-Road	4.9345	51.4684	25.1920	0.0466		2.5769	2.5769		2.3708	2.3708		4,513.0091	4,513.0091	1.4596		4,549.4990
<b>Total</b>	<b>4.9345</b>	<b>51.4684</b>	<b>25.1920</b>	<b>0.0466</b>	<b>24.0883</b>	<b>2.5769</b>	<b>26.6653</b>	<b>13.2409</b>	<b>2.3708</b>	<b>15.6117</b>		<b>4,513.0091</b>	<b>4,513.0091</b>	<b>1.4596</b>		<b>4,549.4990</b>

#### Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.8539	27.1530	6.6693	0.0767	1.7485	0.0836	1.8321	0.4793	0.0800	0.5593		8,317.8310	8,317.8310	0.5947		8,332.6980
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.1907	0.1305	1.4730	4.3000e-003	0.4471	3.6100e-003	0.4507	0.1186	3.3300e-003	0.1219		428.9004	428.9004	0.0126		429.2160

<b>Total</b>	<b>1.0446</b>	<b>27.2834</b>	<b>8.1423</b>	<b>0.0810</b>	<b>2.1957</b>	<b>0.0872</b>	<b>2.2828</b>	<b>0.5979</b>	<b>0.0833</b>	<b>0.6812</b>		<b>8,746.7314</b>	<b>8,746.7314</b>	<b>0.6073</b>		<b>8,761.9140</b>
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**Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	lb/day										lb/day						
Fugitive Dust					10.8398	0.0000	10.8398	5.9584	0.0000	5.9584			0.0000				0.0000
Off-Road	4.9345	51.4684	25.1920	0.0466		2.5769	2.5769		2.3708	2.3708	0.0000	4,513.0091	4,513.0091	1.4596			4,549.4990
<b>Total</b>	<b>4.9345</b>	<b>51.4684</b>	<b>25.1920</b>	<b>0.0466</b>	<b>10.8398</b>	<b>2.5769</b>	<b>13.4167</b>	<b>5.9584</b>	<b>2.3708</b>	<b>8.3292</b>	<b>0.0000</b>	<b>4,513.0091</b>	<b>4,513.0091</b>	<b>1.4596</b>			<b>4,549.4990</b>

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	lb/day										lb/day						
Hauling	0.8539	27.1530	6.6693	0.0767	1.7485	0.0836	1.8321	0.4793	0.0800	0.5593		8,317.8310	8,317.8310	0.5947			8,332.6980
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000			0.0000
Worker	0.1907	0.1305	1.4730	4.3000e-003	0.4471	3.6100e-003	0.4507	0.1186	3.3300e-003	0.1219		428.9004	428.9004	0.0126			429.2160
<b>Total</b>	<b>1.0446</b>	<b>27.2834</b>	<b>8.1423</b>	<b>0.0810</b>	<b>2.1957</b>	<b>0.0872</b>	<b>2.2828</b>	<b>0.5979</b>	<b>0.0833</b>	<b>0.6812</b>		<b>8,746.7314</b>	<b>8,746.7314</b>	<b>0.6073</b>			<b>8,761.9140</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	lb/day										lb/day					
Fugitive Dust					14.1652	0.0000	14.1652	6.8495	0.0000	6.8495			0.0000			0.0000
Off-Road	4.7846	51.4466	33.1490	0.0639		2.3301	2.3301		2.1437	2.1437		6,192.7115	6,192.7115	2.0029		6,242.7827
<b>Total</b>	<b>4.7846</b>	<b>51.4466</b>	<b>33.1490</b>	<b>0.0639</b>	<b>14.1652</b>	<b>2.3301</b>	<b>16.4953</b>	<b>6.8495</b>	<b>2.1437</b>	<b>8.9932</b>		<b>6,192.7115</b>	<b>6,192.7115</b>	<b>2.0029</b>		<b>6,242.7827</b>

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.4269	13.5765	3.3347	0.0383	0.8743	0.0418	0.9161	0.2397	0.0400	0.2796		4,158.9155	4,158.9155	0.2973		4,166.3490
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.1907	0.1305	1.4730	4.3000e-003	0.4471	3.6100e-003	0.4507	0.1186	3.3300e-003	0.1219		428.9004	428.9004	0.0126		429.2160
<b>Total</b>	<b>0.6177</b>	<b>13.7069</b>	<b>4.8077</b>	<b>0.0426</b>	<b>1.3214</b>	<b>0.0454</b>	<b>1.3668</b>	<b>0.3582</b>	<b>0.0433</b>	<b>0.4015</b>		<b>4,587.8159</b>	<b>4,587.8159</b>	<b>0.3100</b>		<b>4,595.5650</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	lb/day										lb/day					

Fugitive Dust					6.3743	0.0000	6.3743	3.0823	0.0000	3.0823			0.0000			0.0000
Off-Road	4.7846	51.4466	33.1490	0.0639		2.3301	2.3301		2.1437	2.1437	0.0000	6,192.7115	6,192.7115	2.0029		6,242.7827
<b>Total</b>	<b>4.7846</b>	<b>51.4466</b>	<b>33.1490</b>	<b>0.0639</b>	<b>6.3743</b>	<b>2.3301</b>	<b>8.7044</b>	<b>3.0823</b>	<b>2.1437</b>	<b>5.2260</b>	<b>0.0000</b>	<b>6,192.7115</b>	<b>6,192.7115</b>	<b>2.0029</b>		<b>6,242.7827</b>

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.4269	13.5765	3.3347	0.0383	0.8743	0.0418	0.9161	0.2397	0.0400	0.2796		4,158.9155	4,158.9155	0.2973		4,166.3490
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.1907	0.1305	1.4730	4.3000e-003	0.4471	3.6100e-003	0.4507	0.1186	3.3300e-003	0.1219		428.9004	428.9004	0.0126		429.2160
<b>Total</b>	<b>0.6177</b>	<b>13.7069</b>	<b>4.8077</b>	<b>0.0426</b>	<b>1.3214</b>	<b>0.0454</b>	<b>1.3668</b>	<b>0.3582</b>	<b>0.0433</b>	<b>0.4015</b>		<b>4,587.8159</b>	<b>4,587.8159</b>	<b>0.3100</b>		<b>4,595.5650</b>

**3.5 Building Construction - 2021**

**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.0477	20.0612	16.1499	0.0300		0.9709	0.9709		0.9126	0.9126		2,850.6901	2,850.6901	0.7122		2,868.4944
<b>Total</b>	<b>2.0477</b>	<b>20.0612</b>	<b>16.1499</b>	<b>0.0300</b>		<b>0.9709</b>	<b>0.9709</b>		<b>0.9126</b>	<b>0.9126</b>		<b>2,850.6901</b>	<b>2,850.6901</b>	<b>0.7122</b>		<b>2,868.4944</b>

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	8.5400e-003	0.2715	0.0667	7.7000e-004	0.0175	8.4000e-004	0.0183	4.7900e-003	8.0000e-004	5.5900e-003		83.1783	83.1783	5.9500e-003		83.3270
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.3815	0.2609	2.9461	8.6100e-003	0.8942	7.2300e-003	0.9014	0.2372	6.6600e-003	0.2438		857.8009	857.8009	0.0252		858.4319
<b>Total</b>	<b>0.3900</b>	<b>0.5325</b>	<b>3.0127</b>	<b>9.3800e-003</b>	<b>0.9117</b>	<b>8.0700e-003</b>	<b>0.9198</b>	<b>0.2419</b>	<b>7.4600e-003</b>	<b>0.2494</b>		<b>940.9792</b>	<b>940.9792</b>	<b>0.0312</b>		<b>941.7589</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	lb/day										lb/day					
Off-Road	2.0477	20.0612	16.1499	0.0300		0.9709	0.9709		0.9126	0.9126	0.0000	2,850.6900	2,850.6900	0.7122		2,868.4944
<b>Total</b>	<b>2.0477</b>	<b>20.0612</b>	<b>16.1499</b>	<b>0.0300</b>		<b>0.9709</b>	<b>0.9709</b>		<b>0.9126</b>	<b>0.9126</b>	<b>0.0000</b>	<b>2,850.6900</b>	<b>2,850.6900</b>	<b>0.7122</b>		<b>2,868.4944</b>

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
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Category	lb/day										lb/day					
Hauling	8.5400e-003	0.2715	0.0667	7.7000e-004	0.0175	8.4000e-004	0.0183	4.7900e-003	8.0000e-004	5.5900e-003		83.1783	83.1783	5.9500e-003		83.3270
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.3815	0.2609	2.9461	8.6100e-003	0.8942	7.2300e-003	0.9014	0.2372	6.6600e-003	0.2438		857.8009	857.8009	0.0252		858.4319
<b>Total</b>	<b>0.3900</b>	<b>0.5325</b>	<b>3.0127</b>	<b>9.3800e-003</b>	<b>0.9117</b>	<b>8.0700e-003</b>	<b>0.9198</b>	<b>0.2419</b>	<b>7.4600e-003</b>	<b>0.2494</b>		<b>940.9792</b>	<b>940.9792</b>	<b>0.0312</b>		<b>941.7589</b>

### 3.6 Paving - 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
	lb/day										lb/day					
Off-Road	1.2489	12.5093	14.1756	0.0226		0.6404	0.6404		0.5909	0.5909		2,155.9409	2,155.9409	0.6806		2,172.9568
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
<b>Total</b>	<b>1.2489</b>	<b>12.5093</b>	<b>14.1756</b>	<b>0.0226</b>		<b>0.6404</b>	<b>0.6404</b>		<b>0.5909</b>	<b>0.5909</b>		<b>2,155.9409</b>	<b>2,155.9409</b>	<b>0.6806</b>		<b>2,172.9568</b>

#### Unmitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
	lb/day										lb/day					
Hauling	0.1708	5.4306	1.3339	0.0153	0.3497	0.0167	0.3664	0.0959	0.0160	0.1119		1,663.5662	1,663.5662	0.1189		1,666.5396
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.1907	0.1305	1.4730	4.3000e-003	0.4471	3.6100e-003	0.4507	0.1186	3.3300e-003	0.1219		428.9004	428.9004	0.0126		429.2160

<b>Total</b>	<b>0.3615</b>	<b>5.5611</b>	<b>2.8069</b>	<b>0.0196</b>	<b>0.7968</b>	<b>0.0203</b>	<b>0.8171</b>	<b>0.2144</b>	<b>0.0193</b>	<b>0.2338</b>		<b>2,092.4666</b>	<b>2,092.4666</b>	<b>0.1316</b>		<b>2,095.7556</b>
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**Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
<b>Category</b>	<b>lb/day</b>										<b>lb/day</b>					
Off-Road	1.2489	12.5093	14.1756	0.0226		0.6404	0.6404		0.5909	0.5909	0.0000	2,155.9409	2,155.9409	0.6806		2,172.9568
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
<b>Total</b>	<b>1.2489</b>	<b>12.5093</b>	<b>14.1756</b>	<b>0.0226</b>		<b>0.6404</b>	<b>0.6404</b>		<b>0.5909</b>	<b>0.5909</b>	<b>0.0000</b>	<b>2,155.9409</b>	<b>2,155.9409</b>	<b>0.6806</b>		<b>2,172.9568</b>

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
<b>Category</b>	<b>lb/day</b>										<b>lb/day</b>					
Hauling	0.1708	5.4306	1.3339	0.0153	0.3497	0.0167	0.3664	0.0959	0.0160	0.1119		1,663.5662	1,663.5662	0.1189		1,666.5396
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.1907	0.1305	1.4730	4.3000e-003	0.4471	3.6100e-003	0.4507	0.1186	3.3300e-003	0.1219		428.9004	428.9004	0.0126		429.2160
<b>Total</b>	<b>0.3615</b>	<b>5.5611</b>	<b>2.8069</b>	<b>0.0196</b>	<b>0.7968</b>	<b>0.0203</b>	<b>0.8171</b>	<b>0.2144</b>	<b>0.0193</b>	<b>0.2338</b>		<b>2,092.4666</b>	<b>2,092.4666</b>	<b>0.1316</b>		<b>2,095.7556</b>

**3.7 Architectural Coating - 2021**

**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	2.3349	16.2863	19.3873	0.0317		1.0037	1.0037		1.0037	1.0037		3,002.1125	3,002.1125	0.2060		3,007.2631
<b>Total</b>	<b>2.3349</b>	<b>16.2863</b>	<b>19.3873</b>	<b>0.0317</b>		<b>1.0037</b>	<b>1.0037</b>		<b>1.0037</b>	<b>1.0037</b>		<b>3,002.1125</b>	<b>3,002.1125</b>	<b>0.2060</b>		<b>3,007.2631</b>

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.1708	5.4306	1.3339	0.0153	0.3497	0.0167	0.3664	0.0959	0.0160	0.1119		1,663.5662	1,663.5662	0.1189		1,666.5396
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.1907	0.1305	1.4730	4.3000e-003	0.4471	3.6100e-003	0.4507	0.1186	3.3300e-003	0.1219		428.9004	428.9004	0.0126		429.2160
<b>Total</b>	<b>0.3615</b>	<b>5.5611</b>	<b>2.8069</b>	<b>0.0196</b>	<b>0.7968</b>	<b>0.0203</b>	<b>0.8171</b>	<b>0.2144</b>	<b>0.0193</b>	<b>0.2338</b>		<b>2,092.4666</b>	<b>2,092.4666</b>	<b>0.1316</b>		<b>2,095.7556</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	lb/day										lb/day					

Archit. Coating	0.0000					0.0000	0.0000		0.0000	0.0000		0.0000			0.0000
Off-Road	2.3349	16.2863	19.3873	0.0317		1.0037	1.0037		1.0037	1.0037	0.0000	3,002.1125	3,002.1125	0.2060	3,007.2631
<b>Total</b>	<b>2.3349</b>	<b>16.2863</b>	<b>19.3873</b>	<b>0.0317</b>		<b>1.0037</b>	<b>1.0037</b>		<b>1.0037</b>	<b>1.0037</b>	<b>0.0000</b>	<b>3,002.1125</b>	<b>3,002.1125</b>	<b>0.2060</b>	<b>3,007.2631</b>

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.1708	5.4306	1.3339	0.0153	0.3497	0.0167	0.3664	0.0959	0.0160	0.1119		1,663.5662	1,663.5662	0.1189		1,666.5396
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.1907	0.1305	1.4730	4.3000e-003	0.4471	3.6100e-003	0.4507	0.1186	3.3300e-003	0.1219		428.9004	428.9004	0.0126		429.2160
<b>Total</b>	<b>0.3615</b>	<b>5.5611</b>	<b>2.8069</b>	<b>0.0196</b>	<b>0.7968</b>	<b>0.0203</b>	<b>0.8171</b>	<b>0.2144</b>	<b>0.0193</b>	<b>0.2338</b>		<b>2,092.4666</b>	<b>2,092.4666</b>	<b>0.1316</b>		<b>2,095.7556</b>

Sample Scenario - 10 Pieces of Equipment, 150 Truck Trips - Los Angeles-South Coast County, Summer

**Sample Scenario - 10 Pieces of Equipment, 150 Truck Trips  
Los Angeles-South Coast County, Summer**

**1.0 Project Characteristics**

**1.1 Land Usage**

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Apartments Low Rise	10.00	Dwelling Unit	0.63	10,000.00	29

**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>	11	<b>Operational Year</b>	2021		
<b>Utility Company</b>	Southern California Edison				
<b>CO2 Intensity (lb/MW hr)</b>	702.44	<b>CH4 Intensity (lb/MW hr)</b>	0.029	<b>N2O Intensity (lb/MW hr)</b>	0.006

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

Table Name	Column Name	Default Value	New Value
tblArchitecturalCoating	ConstArea_Residential_Exterior	6,750.00	0.00
tblArchitecturalCoating	ConstArea_Residential_Interior	20,250.00	0.00
tblConstDustMitigation	WaterUnpavedRoadVehicleSpeed	0	15
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	10.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	4.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	3.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	3.00

tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	4.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	4.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	5.00
tblOffRoadEquipment	UsageHours	6.00	8.00
tblOffRoadEquipment	UsageHours	4.00	8.00
tblOffRoadEquipment	UsageHours	7.00	8.00
tblOffRoadEquipment	UsageHours	7.00	6.00
tblOffRoadEquipment	UsageHours	1.00	8.00
tblOffRoadEquipment	UsageHours	1.00	8.00
tblOffRoadEquipment	UsageHours	8.00	6.00
tblOffRoadEquipment	UsageHours	6.00	8.00
tblTripsAndVMT	HaulingTripNumber	0.00	150.00
tblTripsAndVMT	HaulingTripNumber	0.00	150.00
tblTripsAndVMT	HaulingTripNumber	0.00	150.00
tblTripsAndVMT	HaulingTripNumber	0.00	150.00
tblTripsAndVMT	HaulingTripNumber	0.00	150.00
tblTripsAndVMT	HaulingTripNumber	0.00	150.00
tblTripsAndVMT	VendorTripNumber	1.00	0.00
tblTripsAndVMT	WorkerTripNumber	25.00	50.00
tblTripsAndVMT	WorkerTripNumber	7.00	100.00
tblTripsAndVMT	WorkerTripNumber	25.00	50.00
tblTripsAndVMT	WorkerTripNumber	1.00	50.00
tblTripsAndVMT	WorkerTripNumber	25.00	50.00
tblTripsAndVMT	WorkerTripNumber	25.00	50.00

## 2.0 Emissions Summary

### 2.1 Overall Construction (Maximum Daily Emission)

#### Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	7.6332	104.7193	43.4144	0.1809	33.2921	3.3492	36.6413	17.4183	3.0858	20.5041	0.0000	18,907.3403	18,907.3403	2.8655	0.0000	18,974.9133
<b>Maximum</b>	<b>7.6332</b>	<b>104.7193</b>	<b>43.4144</b>	<b>0.1809</b>	<b>33.2921</b>	<b>3.3492</b>	<b>36.6413</b>	<b>17.4183</b>	<b>3.0858</b>	<b>20.5041</b>	<b>0.0000</b>	<b>18,907.3403</b>	<b>18,907.3403</b>	<b>2.8655</b>	<b>0.0000</b>	<b>18,974.9133</b>

### Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	7.6332	104.7193	43.4144	0.1809	16.7314	3.3492	20.0805	8.3152	3.0858	11.4010	0.0000	18,907.3403	18,907.3403	2.8655	0.0000	18,974.9133
<b>Maximum</b>	<b>7.6332</b>	<b>104.7193</b>	<b>43.4144</b>	<b>0.1809</b>	<b>16.7314</b>	<b>3.3492</b>	<b>20.0805</b>	<b>8.3152</b>	<b>3.0858</b>	<b>11.4010</b>	<b>0.0000</b>	<b>18,907.3403</b>	<b>18,907.3403</b>	<b>2.8655</b>	<b>0.0000</b>	<b>18,974.9133</b>

	ROG	NOx	CO	SO2	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	49.74	0.00	45.20	52.26	0.00	44.40	0.00	0.00	0.00	0.00	0.00	0.00

## 3.0 Construction Detail

### Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
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1	Demolition	Demolition	1/1/2021	1/14/2021	5	10
2	Site Preparation	Site Preparation	1/15/2021	1/15/2021	5	1
3	Grading	Grading	1/16/2021	1/19/2021	5	2
4	Building Construction	Building Construction	1/20/2021	6/8/2021	5	100
5	Paving	Paving	6/9/2021	6/15/2021	5	5
6	Architectural Coating	Architectural Coating	6/16/2021	6/22/2021	5	5

**Acres of Grading (Site Preparation Phase): 0**

**Acres of Grading (Grading Phase): 6**

**Acres of Paving: 0**

**Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0**

**OffRoad Equipment**

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Grading	Excavators	2	8.00	158	0.38
Grading	Graders	2	8.00	187	0.41
Grading	Rubber Tired Dozers	2	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	2	8.00	231	0.29
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	4	6.00	97	0.37
Building Construction	Welders	3	8.00	46	0.45
Paving	Cement and Mortar Mixers	2	6.00	9	0.56
Paving	Pavers	3	8.00	130	0.42
Paving	Paving Equipment	3	8.00	132	0.36
Paving	Rollers	2	6.00	80	0.38
Architectural Coating	Air Compressors	10	8.00	78	0.48
Demolition	Concrete/Industrial Saws	3	8.00	81	0.73
Demolition	Excavators	3	8.00	158	0.38



Demolition	Rubber Tired Dozers	4	8.00	247	0.40
Site Preparation	Rubber Tired Dozers	5	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	5	8.00	97	0.37

### Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Grading	10	50.00	0.00	150.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	10	100.00	0.00	150.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	10	50.00	0.00	150.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	10	50.00	0.00	150.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Demolition	10	50.00	0.00	150.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	10	50.00	0.00	150.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

### 3.1 Mitigation Measures Construction

Water Exposed Area

Reduce Vehicle Speed on Unpaved Roads

### 3.2 Demolition - 2021

#### Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	6.0275	59.4590	36.9887	0.0684		2.9625	2.9625		2.7670	2.7670		6,587.9786	6,587.9786	1.6589		6,629.4509
<b>Total</b>	<b>6.0275</b>	<b>59.4590</b>	<b>36.9887</b>	<b>0.0684</b>		<b>2.9625</b>	<b>2.9625</b>		<b>2.7670</b>	<b>2.7670</b>		<b>6,587.9786</b>	<b>6,587.9786</b>	<b>1.6589</b>		<b>6,629.4509</b>

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.1251	4.0237	0.9434	0.0117	0.2623	0.0124	0.2746	0.0719	0.0118	0.0837		1,269.6694	1,269.6694	0.0862		1,271.8235
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.2143	0.1473	2.0139	5.7200e-003	0.5589	4.5200e-003	0.5634	0.1482	4.1600e-003	0.1524		569.3849	569.3849	0.0168		569.8044
<b>Total</b>	<b>0.3394</b>	<b>4.1710</b>	<b>2.9573</b>	<b>0.0174</b>	<b>0.8212</b>	<b>0.0169</b>	<b>0.8380</b>	<b>0.2201</b>	<b>0.0160</b>	<b>0.2361</b>		<b>1,839.0543</b>	<b>1,839.0543</b>	<b>0.1029</b>		<b>1,841.6279</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	lb/day										lb/day					
Off-Road	6.0275	59.4590	36.9887	0.0684		2.9625	2.9625		2.7670	2.7670	0.0000	6,587.9786	6,587.9786	1.6589		6,629.4509
<b>Total</b>	<b>6.0275</b>	<b>59.4590</b>	<b>36.9887</b>	<b>0.0684</b>		<b>2.9625</b>	<b>2.9625</b>		<b>2.7670</b>	<b>2.7670</b>	<b>0.0000</b>	<b>6,587.9786</b>	<b>6,587.9786</b>	<b>1.6589</b>		<b>6,629.4509</b>

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
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Category	lb/day										lb/day			
Hauling	0.1251	4.0237	0.9434	0.0117	0.2623	0.0124	0.2746	0.0719	0.0118	0.0837	1,269.6694	1,269.6694	0.0862	1,271.8235
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.2143	0.1473	2.0139	5.7200e-003	0.5589	4.5200e-003	0.5634	0.1482	4.1600e-003	0.1524	569.3849	569.3849	0.0168	569.8044
<b>Total</b>	<b>0.3394</b>	<b>4.1710</b>	<b>2.9573</b>	<b>0.0174</b>	<b>0.8212</b>	<b>0.0169</b>	<b>0.8380</b>	<b>0.2201</b>	<b>0.0160</b>	<b>0.2361</b>	<b>1,839.0543</b>	<b>1,839.0543</b>	<b>0.1029</b>	<b>1,841.6279</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	lb/day										lb/day					
Fugitive Dust					30.1104	0.0000	30.1104	16.5511	0.0000	16.5511			0.0000			0.0000
Off-Road	6.1682	64.3355	31.4901	0.0582		3.2211	3.2211		2.9635	2.9635		5,641.2614	5,641.2614	1.8245		5,686.8738
<b>Total</b>	<b>6.1682</b>	<b>64.3355</b>	<b>31.4901</b>	<b>0.0582</b>	<b>30.1104</b>	<b>3.2211</b>	<b>33.3316</b>	<b>16.5511</b>	<b>2.9635</b>	<b>19.5146</b>		<b>5,641.2614</b>	<b>5,641.2614</b>	<b>1.8245</b>		<b>5,686.8738</b>

#### Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	1.2507	40.2365	9.4343	0.1170	2.6228	0.1235	2.7463	0.7190	0.1182	0.8371		12,696.6941	12,696.6941	0.8616		12,718.2351
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.2143	0.1473	2.0139	5.7200e-003	0.5589	4.5200e-003	0.5634	0.1482	4.1600e-003	0.1524		569.3849	569.3849	0.0168		569.8044

<b>Total</b>	<b>1.4650</b>	<b>40.3838</b>	<b>11.4482</b>	<b>0.1227</b>	<b>3.1817</b>	<b>0.1280</b>	<b>3.3097</b>	<b>0.8672</b>	<b>0.1223</b>	<b>0.9895</b>		<b>13,266.0790</b>	<b>13,266.0790</b>	<b>0.8784</b>		<b>13,288.0395</b>
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**Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					13.5497	0.0000	13.5497	7.4480	0.0000	7.4480			0.0000			0.0000
Off-Road	6.1682	64.3355	31.4901	0.0582		3.2211	3.2211		2.9635	2.9635	0.0000	5,641.2613	5,641.2613	1.8245		5,686.8738
<b>Total</b>	<b>6.1682</b>	<b>64.3355</b>	<b>31.4901</b>	<b>0.0582</b>	<b>13.5497</b>	<b>3.2211</b>	<b>16.7708</b>	<b>7.4480</b>	<b>2.9635</b>	<b>10.4115</b>	<b>0.0000</b>	<b>5,641.2613</b>	<b>5,641.2613</b>	<b>1.8245</b>		<b>5,686.8738</b>

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	1.2507	40.2365	9.4343	0.1170	2.6228	0.1235	2.7463	0.7190	0.1182	0.8371		12,696.6941	12,696.6941	0.8616		12,718.2351
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.2143	0.1473	2.0139	5.7200e-003	0.5589	4.5200e-003	0.5634	0.1482	4.1600e-003	0.1524		569.3849	569.3849	0.0168		569.8044
<b>Total</b>	<b>1.4650</b>	<b>40.3838</b>	<b>11.4482</b>	<b>0.1227</b>	<b>3.1817</b>	<b>0.1280</b>	<b>3.3097</b>	<b>0.8672</b>	<b>0.1223</b>	<b>0.9895</b>		<b>13,266.0790</b>	<b>13,266.0790</b>	<b>0.8784</b>		<b>13,288.0395</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	lb/day										lb/day					
Fugitive Dust					15.2257	0.0000	15.2257	6.9640	0.0000	6.9640			0.0000			0.0000
Off-Road	5.6905	63.2957	36.6834	0.0772		2.7055	2.7055		2.4891	2.4891		7,476.0798	7,476.0798	2.4179		7,536.5276
<b>Total</b>	<b>5.6905</b>	<b>63.2957</b>	<b>36.6834</b>	<b>0.0772</b>	<b>15.2257</b>	<b>2.7055</b>	<b>17.9312</b>	<b>6.9640</b>	<b>2.4891</b>	<b>9.4530</b>		<b>7,476.0798</b>	<b>7,476.0798</b>	<b>2.4179</b>		<b>7,536.5276</b>

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.6253	20.1183	4.7172	0.0585	1.3114	0.0618	1.3732	0.3595	0.0591	0.4186		6,348.3470	6,348.3470	0.4308		6,359.1176
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.2143	0.1473	2.0139	5.7200e-003	0.5589	4.5200e-003	0.5634	0.1482	4.1600e-003	0.1524		569.3849	569.3849	0.0168		569.8044
<b>Total</b>	<b>0.8397</b>	<b>20.2656</b>	<b>6.7310</b>	<b>0.0642</b>	<b>1.8703</b>	<b>0.0663</b>	<b>1.9366</b>	<b>0.5077</b>	<b>0.0632</b>	<b>0.5709</b>		<b>6,917.7320</b>	<b>6,917.7320</b>	<b>0.4476</b>		<b>6,928.9219</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	lb/day										lb/day					

Fugitive Dust					6.8516	0.0000	6.8516	3.1338	0.0000	3.1338			0.0000			0.0000
Off-Road	5.6905	63.2957	36.6834	0.0772		2.7055	2.7055		2.4891	2.4891	0.0000	7,476.0797	7,476.0797	2.4179		7,536.5276
<b>Total</b>	<b>5.6905</b>	<b>63.2957</b>	<b>36.6834</b>	<b>0.0772</b>	<b>6.8516</b>	<b>2.7055</b>	<b>9.5570</b>	<b>3.1338</b>	<b>2.4891</b>	<b>5.6228</b>	<b>0.0000</b>	<b>7,476.0797</b>	<b>7,476.0797</b>	<b>2.4179</b>		<b>7,536.5276</b>

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.6253	20.1183	4.7172	0.0585	1.3114	0.0618	1.3732	0.3595	0.0591	0.4186		6,348.3470	6,348.3470	0.4308		6,359.1176
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.2143	0.1473	2.0139	5.7200e-003	0.5589	4.5200e-003	0.5634	0.1482	4.1600e-003	0.1524		569.3849	569.3849	0.0168		569.8044
<b>Total</b>	<b>0.8397</b>	<b>20.2656</b>	<b>6.7310</b>	<b>0.0642</b>	<b>1.8703</b>	<b>0.0663</b>	<b>1.9366</b>	<b>0.5077</b>	<b>0.0632</b>	<b>0.5709</b>		<b>6,917.7320</b>	<b>6,917.7320</b>	<b>0.4476</b>		<b>6,928.9219</b>

**3.5 Building Construction - 2021**

**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.6530	23.0790	19.5876	0.0351		1.1192	1.1192		1.0608	1.0608		3,265.6455	3,265.6455	0.7662		3,284.8007
<b>Total</b>	<b>2.6530</b>	<b>23.0790</b>	<b>19.5876</b>	<b>0.0351</b>		<b>1.1192</b>	<b>1.1192</b>		<b>1.0608</b>	<b>1.0608</b>		<b>3,265.6455</b>	<b>3,265.6455</b>	<b>0.7662</b>		<b>3,284.8007</b>

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0125	0.4024	0.0943	1.1700e-003	0.0262	1.2400e-003	0.0275	7.1900e-003	1.1800e-003	8.3700e-003		126.9669	126.9669	8.6200e-003		127.1824
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.4287	0.2946	4.0277	0.0114	1.1178	9.0300e-003	1.1268	0.2964	8.3200e-003	0.3048		1,138.7699	1,138.7699	0.0336		1,139.6087
<b>Total</b>	<b>0.4412</b>	<b>0.6970</b>	<b>4.1221</b>	<b>0.0126</b>	<b>1.1440</b>	<b>0.0103</b>	<b>1.1543</b>	<b>0.3036</b>	<b>9.5000e-003</b>	<b>0.3131</b>		<b>1,265.7368</b>	<b>1,265.7368</b>	<b>0.0422</b>		<b>1,266.7911</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	lb/day										lb/day					
Off-Road	2.6530	23.0790	19.5876	0.0351		1.1192	1.1192		1.0608	1.0608	0.0000	3,265.6455	3,265.6455	0.7662		3,284.8007
<b>Total</b>	<b>2.6530</b>	<b>23.0790</b>	<b>19.5876</b>	<b>0.0351</b>		<b>1.1192</b>	<b>1.1192</b>		<b>1.0608</b>	<b>1.0608</b>	<b>0.0000</b>	<b>3,265.6455</b>	<b>3,265.6455</b>	<b>0.7662</b>		<b>3,284.8007</b>

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
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Category	lb/day										lb/day				
Hauling	0.0125	0.4024	0.0943	1.1700e-003	0.0262	1.2400e-003	0.0275	7.1900e-003	1.1800e-003	8.3700e-003		126.9669	126.9669	8.6200e-003	127.1824
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000
Worker	0.4287	0.2946	4.0277	0.0114	1.1178	9.0300e-003	1.1268	0.2964	8.3200e-003	0.3048		1,138.7699	1,138.7699	0.0336	1,139.6087
<b>Total</b>	<b>0.4412</b>	<b>0.6970</b>	<b>4.1221</b>	<b>0.0126</b>	<b>1.1440</b>	<b>0.0103</b>	<b>1.1543</b>	<b>0.3036</b>	<b>9.5000e-003</b>	<b>0.3131</b>		<b>1,265.7368</b>	<b>1,265.7368</b>	<b>0.0422</b>	<b>1,266.7911</b>

### 3.6 Paving - 2021

#### Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.6872	17.0446	19.6218	0.0313		0.8616	0.8616		0.7944	0.7944		3,005.4575	3,005.4575	0.9554		3,029.3421
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
<b>Total</b>	<b>1.6872</b>	<b>17.0446</b>	<b>19.6218</b>	<b>0.0313</b>		<b>0.8616</b>	<b>0.8616</b>		<b>0.7944</b>	<b>0.7944</b>		<b>3,005.4575</b>	<b>3,005.4575</b>	<b>0.9554</b>		<b>3,029.3421</b>

#### Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.2501	8.0473	1.8869	0.0234	0.5246	0.0247	0.5493	0.1438	0.0236	0.1674		2,539.3388	2,539.3388	0.1723		2,543.6470
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.2143	0.1473	2.0139	5.7200e-003	0.5589	4.5200e-003	0.5634	0.1482	4.1600e-003	0.1524		569.3849	569.3849	0.0168		569.8044



<b>Total</b>	<b>0.4645</b>	<b>8.1946</b>	<b>3.9007</b>	<b>0.0291</b>	<b>1.0834</b>	<b>0.0292</b>	<b>1.1127</b>	<b>0.2920</b>	<b>0.0278</b>	<b>0.3198</b>		<b>3,108.7237</b>	<b>3,108.7237</b>	<b>0.1891</b>		<b>3,113.4514</b>
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**Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
<b>Category</b>	<b>lb/day</b>										<b>lb/day</b>					
Off-Road	1.6872	17.0446	19.6218	0.0313		0.8616	0.8616		0.7944	0.7944	0.0000	3,005.4575	3,005.4575	0.9554		3,029.3421
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
<b>Total</b>	<b>1.6872</b>	<b>17.0446</b>	<b>19.6218</b>	<b>0.0313</b>		<b>0.8616</b>	<b>0.8616</b>		<b>0.7944</b>	<b>0.7944</b>	<b>0.0000</b>	<b>3,005.4575</b>	<b>3,005.4575</b>	<b>0.9554</b>		<b>3,029.3421</b>

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
<b>Category</b>	<b>lb/day</b>										<b>lb/day</b>					
Hauling	0.2501	8.0473	1.8869	0.0234	0.5246	0.0247	0.5493	0.1438	0.0236	0.1674		2,539.3388	2,539.3388	0.1723		2,543.6470
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.2143	0.1473	2.0139	5.7200e-003	0.5589	4.5200e-003	0.5634	0.1482	4.1600e-003	0.1524		569.3849	569.3849	0.0168		569.8044
<b>Total</b>	<b>0.4645</b>	<b>8.1946</b>	<b>3.9007</b>	<b>0.0291</b>	<b>1.0834</b>	<b>0.0292</b>	<b>1.1127</b>	<b>0.2920</b>	<b>0.0278</b>	<b>0.3198</b>		<b>3,108.7237</b>	<b>3,108.7237</b>	<b>0.1891</b>		<b>3,113.4514</b>

**3.7 Architectural Coating - 2021**

**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	2.9187	20.3579	24.2341	0.0396		1.2546	1.2546		1.2546	1.2546		3,752.6407	3,752.6407	0.2575		3,759.0789
<b>Total</b>	<b>2.9187</b>	<b>20.3579</b>	<b>24.2341</b>	<b>0.0396</b>		<b>1.2546</b>	<b>1.2546</b>		<b>1.2546</b>	<b>1.2546</b>		<b>3,752.6407</b>	<b>3,752.6407</b>	<b>0.2575</b>		<b>3,759.0789</b>

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.2501	8.0473	1.8869	0.0234	0.5246	0.0247	0.5493	0.1438	0.0236	0.1674		2,539.3388	2,539.3388	0.1723		2,543.6470
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.2143	0.1473	2.0139	5.7200e-003	0.5589	4.5200e-003	0.5634	0.1482	4.1600e-003	0.1524		569.3849	569.3849	0.0168		569.8044
<b>Total</b>	<b>0.4645</b>	<b>8.1946</b>	<b>3.9007</b>	<b>0.0291</b>	<b>1.0834</b>	<b>0.0292</b>	<b>1.1127</b>	<b>0.2920</b>	<b>0.0278</b>	<b>0.3198</b>		<b>3,108.7237</b>	<b>3,108.7237</b>	<b>0.1891</b>		<b>3,113.4514</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	lb/day										lb/day					

Archit. Coating	0.0000					0.0000	0.0000		0.0000	0.0000		0.0000			0.0000
Off-Road	2.9187	20.3579	24.2341	0.0396		1.2546	1.2546		1.2546	1.2546	0.0000	3,752.6406	3,752.6406	0.2575	3,759.0789
<b>Total</b>	<b>2.9187</b>	<b>20.3579</b>	<b>24.2341</b>	<b>0.0396</b>		<b>1.2546</b>	<b>1.2546</b>		<b>1.2546</b>	<b>1.2546</b>	<b>0.0000</b>	<b>3,752.6406</b>	<b>3,752.6406</b>	<b>0.2575</b>	<b>3,759.0789</b>

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.2501	8.0473	1.8869	0.0234	0.5246	0.0247	0.5493	0.1438	0.0236	0.1674		2,539.3388	2,539.3388	0.1723		2,543.6470
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.2143	0.1473	2.0139	5.7200e-003	0.5589	4.5200e-003	0.5634	0.1482	4.1600e-003	0.1524		569.3849	569.3849	0.0168		569.8044
<b>Total</b>	<b>0.4645</b>	<b>8.1946</b>	<b>3.9007</b>	<b>0.0291</b>	<b>1.0834</b>	<b>0.0292</b>	<b>1.1127</b>	<b>0.2920</b>	<b>0.0278</b>	<b>0.3198</b>		<b>3,108.7237</b>	<b>3,108.7237</b>	<b>0.1891</b>		<b>3,113.4514</b>

Sample Scenario - 10 Pieces of Equipment, 150 Truck Trips - Los Angeles-South Coast County, Winter

**Sample Scenario - 10 Pieces of Equipment, 150 Truck Trips  
Los Angeles-South Coast County, Winter**

**1.0 Project Characteristics**

**1.1 Land Usage**

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Apartments Low Rise	10.00	Dwelling Unit	0.63	10,000.00	29

**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>	11	<b>Operational Year</b>	2021		
<b>Utility Company</b>	Southern California Edison				
<b>CO2 Intensity (lb/MW hr)</b>	702.44	<b>CH4 Intensity (lb/MW hr)</b>	0.029	<b>N2O Intensity (lb/MW hr)</b>	0.006

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

Table Name	Column Name	Default Value	New Value
tblArchitecturalCoating	ConstArea_Residential_Exterior	6,750.00	0.00
tblArchitecturalCoating	ConstArea_Residential_Interior	20,250.00	0.00
tblConstDustMitigation	WaterUnpavedRoadVehicleSpeed	0	15
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	10.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	4.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	3.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	3.00

tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	4.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	4.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	5.00
tblOffRoadEquipment	UsageHours	6.00	8.00
tblOffRoadEquipment	UsageHours	4.00	8.00
tblOffRoadEquipment	UsageHours	7.00	8.00
tblOffRoadEquipment	UsageHours	7.00	6.00
tblOffRoadEquipment	UsageHours	1.00	8.00
tblOffRoadEquipment	UsageHours	1.00	8.00
tblOffRoadEquipment	UsageHours	8.00	6.00
tblOffRoadEquipment	UsageHours	6.00	8.00
tblTripsAndVMT	HaulingTripNumber	0.00	150.00
tblTripsAndVMT	HaulingTripNumber	0.00	150.00
tblTripsAndVMT	HaulingTripNumber	0.00	150.00
tblTripsAndVMT	HaulingTripNumber	0.00	150.00
tblTripsAndVMT	HaulingTripNumber	0.00	150.00
tblTripsAndVMT	HaulingTripNumber	0.00	150.00
tblTripsAndVMT	VendorTripNumber	1.00	0.00
tblTripsAndVMT	WorkerTripNumber	25.00	50.00
tblTripsAndVMT	WorkerTripNumber	7.00	100.00
tblTripsAndVMT	WorkerTripNumber	25.00	50.00
tblTripsAndVMT	WorkerTripNumber	1.00	50.00
tblTripsAndVMT	WorkerTripNumber	25.00	50.00
tblTripsAndVMT	WorkerTripNumber	25.00	50.00

## 2.0 Emissions Summary

### 2.1 Overall Construction (Maximum Daily Emission)

#### Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	7.6874	105.2280	43.5267	0.1786	33.2921	3.3510	36.6432	17.4183	3.0876	20.5059	0.0000	18,654.1334	18,654.1334	2.8797	0.0000	18,722.4407
<b>Maximum</b>	<b>7.6874</b>	<b>105.2280</b>	<b>43.5267</b>	<b>0.1786</b>	<b>33.2921</b>	<b>3.3510</b>	<b>36.6432</b>	<b>17.4183</b>	<b>3.0876</b>	<b>20.5059</b>	<b>0.0000</b>	<b>18,654.1334</b>	<b>18,654.1334</b>	<b>2.8797</b>	<b>0.0000</b>	<b>18,722.4407</b>

### Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	7.6874	105.2280	43.5267	0.1786	16.7314	3.3510	20.0824	8.3152	3.0876	11.4027	0.0000	18,654.1334	18,654.1334	2.8797	0.0000	18,722.4407
<b>Maximum</b>	<b>7.6874</b>	<b>105.2280</b>	<b>43.5267</b>	<b>0.1786</b>	<b>16.7314</b>	<b>3.3510</b>	<b>20.0824</b>	<b>8.3152</b>	<b>3.0876</b>	<b>11.4027</b>	<b>0.0000</b>	<b>18,654.1334</b>	<b>18,654.1334</b>	<b>2.8797</b>	<b>0.0000</b>	<b>18,722.4407</b>

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
<b>Percent Reduction</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>49.74</b>	<b>0.00</b>	<b>45.19</b>	<b>52.26</b>	<b>0.00</b>	<b>44.39</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>

## 3.0 Construction Detail

### Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
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1	Demolition	Demolition	1/1/2021	1/14/2021	5	10
2	Site Preparation	Site Preparation	1/15/2021	1/15/2021	5	1
3	Grading	Grading	1/16/2021	1/19/2021	5	2
4	Building Construction	Building Construction	1/20/2021	6/8/2021	5	100
5	Paving	Paving	6/9/2021	6/15/2021	5	5
6	Architectural Coating	Architectural Coating	6/16/2021	6/22/2021	5	5

**Acres of Grading (Site Preparation Phase): 0**

**Acres of Grading (Grading Phase): 6**

**Acres of Paving: 0**

**Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0**

**OffRoad Equipment**

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Grading	Excavators	2	8.00	158	0.38
Grading	Graders	2	8.00	187	0.41
Grading	Rubber Tired Dozers	2	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	2	8.00	231	0.29
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	4	6.00	97	0.37
Building Construction	Welders	3	8.00	46	0.45
Paving	Cement and Mortar Mixers	2	6.00	9	0.56
Paving	Pavers	3	8.00	130	0.42
Paving	Paving Equipment	3	8.00	132	0.36
Paving	Rollers	2	6.00	80	0.38
Architectural Coating	Air Compressors	10	8.00	78	0.48
Demolition	Concrete/Industrial Saws	3	8.00	81	0.73
Demolition	Excavators	3	8.00	158	0.38

Demolition	Rubber Tired Dozers	4	8.00	247	0.40
Site Preparation	Rubber Tired Dozers	5	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	5	8.00	97	0.37

### Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Grading	10	50.00	0.00	150.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	10	100.00	0.00	150.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	10	50.00	0.00	150.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	10	50.00	0.00	150.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Demolition	10	50.00	0.00	150.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	10	50.00	0.00	150.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

### 3.1 Mitigation Measures Construction

Water Exposed Area

Reduce Vehicle Speed on Unpaved Roads

### 3.2 Demolition - 2021

#### Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	6.0275	59.4590	36.9887	0.0684		2.9625	2.9625		2.7670	2.7670		6,587.9786	6,587.9786	1.6589		6,629.4509
<b>Total</b>	<b>6.0275</b>	<b>59.4590</b>	<b>36.9887</b>	<b>0.0684</b>		<b>2.9625</b>	<b>2.9625</b>		<b>2.7670</b>	<b>2.7670</b>		<b>6,587.9786</b>	<b>6,587.9786</b>	<b>1.6589</b>		<b>6,629.4509</b>



**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.1281	4.0729	1.0004	0.0115	0.2623	0.0125	0.2748	0.0719	0.0120	0.0839		1,247.6747	1,247.6747	0.0892		1,249.9047
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.2384	0.1631	1.8413	5.3800e-003	0.5589	4.5200e-003	0.5634	0.1482	4.1600e-003	0.1524		536.1256	536.1256	0.0158		536.5200
<b>Total</b>	<b>0.3665</b>	<b>4.2360</b>	<b>2.8417</b>	<b>0.0169</b>	<b>0.8212</b>	<b>0.0171</b>	<b>0.8382</b>	<b>0.2201</b>	<b>0.0162</b>	<b>0.2363</b>		<b>1,783.8002</b>	<b>1,783.8002</b>	<b>0.1050</b>		<b>1,786.4247</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	lb/day										lb/day					
Off-Road	6.0275	59.4590	36.9887	0.0684		2.9625	2.9625		2.7670	2.7670	0.0000	6,587.9786	6,587.9786	1.6589		6,629.4509
<b>Total</b>	<b>6.0275</b>	<b>59.4590</b>	<b>36.9887</b>	<b>0.0684</b>		<b>2.9625</b>	<b>2.9625</b>		<b>2.7670</b>	<b>2.7670</b>	<b>0.0000</b>	<b>6,587.9786</b>	<b>6,587.9786</b>	<b>1.6589</b>		<b>6,629.4509</b>

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
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Category	lb/day										lb/day			
Hauling	0.1281	4.0729	1.0004	0.0115	0.2623	0.0125	0.2748	0.0719	0.0120	0.0839	1,247.6747	1,247.6747	0.0892	1,249.9047
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.2384	0.1631	1.8413	5.3800e-003	0.5589	4.5200e-003	0.5634	0.1482	4.1600e-003	0.1524	536.1256	536.1256	0.0158	536.5200
<b>Total</b>	<b>0.3665</b>	<b>4.2360</b>	<b>2.8417</b>	<b>0.0169</b>	<b>0.8212</b>	<b>0.0171</b>	<b>0.8382</b>	<b>0.2201</b>	<b>0.0162</b>	<b>0.2363</b>	<b>1,783.8002</b>	<b>1,783.8002</b>	<b>0.1050</b>	<b>1,786.4247</b>

### 3.3 Site Preparation - 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
	lb/day										lb/day					
Fugitive Dust					30.1104	0.0000	30.1104	16.5511	0.0000	16.5511			0.0000			0.0000
Off-Road	6.1682	64.3355	31.4901	0.0582		3.2211	3.2211		2.9635	2.9635	5,641.2614	5,641.2614	1.8245			5,686.8738
<b>Total</b>	<b>6.1682</b>	<b>64.3355</b>	<b>31.4901</b>	<b>0.0582</b>	<b>30.1104</b>	<b>3.2211</b>	<b>33.3316</b>	<b>16.5511</b>	<b>2.9635</b>	<b>19.5146</b>	<b>5,641.2614</b>	<b>5,641.2614</b>	<b>1.8245</b>			<b>5,686.8738</b>

#### Unmitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
	lb/day										lb/day					
Hauling	1.2808	40.7294	10.0040	0.1150	2.6228	0.1254	2.7482	0.7190	0.1200	0.8389	12,476.7465	12,476.7465	0.8920			12,499.0470
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000
Worker	0.2384	0.1631	1.8413	5.3800e-003	0.5589	4.5200e-003	0.5634	0.1482	4.1600e-003	0.1524	536.1256	536.1256	0.0158			536.5200

<b>Total</b>	<b>1.5192</b>	<b>40.8925</b>	<b>11.8453</b>	<b>0.1204</b>	<b>3.1817</b>	<b>0.1299</b>	<b>3.3116</b>	<b>0.8672</b>	<b>0.1241</b>	<b>0.9913</b>		<b>13,012.87</b>	<b>13,012.872</b>	<b>0.9078</b>		<b>13,035.56</b>
												<b>20</b>	<b>0</b>			<b>69</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	lb/day										lb/day					
Fugitive Dust					13.5497	0.0000	13.5497	7.4480	0.0000	7.4480			0.0000			0.0000
Off-Road	6.1682	64.3355	31.4901	0.0582		3.2211	3.2211		2.9635	2.9635	0.0000	5,641.2613	5,641.2613	1.8245		5,686.8738
<b>Total</b>	<b>6.1682</b>	<b>64.3355</b>	<b>31.4901</b>	<b>0.0582</b>	<b>13.5497</b>	<b>3.2211</b>	<b>16.7708</b>	<b>7.4480</b>	<b>2.9635</b>	<b>10.4115</b>	<b>0.0000</b>	<b>5,641.2613</b>	<b>5,641.2613</b>	<b>1.8245</b>		<b>5,686.8738</b>

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	1.2808	40.7294	10.0040	0.1150	2.6228	0.1254	2.7482	0.7190	0.1200	0.8389		12,476.7465	12,476.7465	0.8920		12,499.0470
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.2384	0.1631	1.8413	5.3800e-003	0.5589	4.5200e-003	0.5634	0.1482	4.1600e-003	0.1524		536.1256	536.1256	0.0158		536.5200
<b>Total</b>	<b>1.5192</b>	<b>40.8925</b>	<b>11.8453</b>	<b>0.1204</b>	<b>3.1817</b>	<b>0.1299</b>	<b>3.3116</b>	<b>0.8672</b>	<b>0.1241</b>	<b>0.9913</b>		<b>13,012.87</b>	<b>13,012.872</b>	<b>0.9078</b>		<b>13,035.56</b>
												<b>20</b>	<b>0</b>			<b>69</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	lb/day										lb/day					
Fugitive Dust					15.2257	0.0000	15.2257	6.9640	0.0000	6.9640			0.0000			0.0000
Off-Road	5.6905	63.2957	36.6834	0.0772		2.7055	2.7055		2.4891	2.4891		7,476.0798	7,476.0798	2.4179		7,536.5276
<b>Total</b>	<b>5.6905</b>	<b>63.2957</b>	<b>36.6834</b>	<b>0.0772</b>	<b>15.2257</b>	<b>2.7055</b>	<b>17.9312</b>	<b>6.9640</b>	<b>2.4891</b>	<b>9.4530</b>		<b>7,476.0798</b>	<b>7,476.0798</b>	<b>2.4179</b>		<b>7,536.5276</b>

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.6404	20.3647	5.0020	0.0575	1.3114	0.0627	1.3741	0.3595	0.0600	0.4195		6,238.3732	6,238.3732	0.4460		6,249.5235
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.2384	0.1631	1.8413	5.3800e-003	0.5589	4.5200e-003	0.5634	0.1482	4.1600e-003	0.1524		536.1256	536.1256	0.0158		536.5200
<b>Total</b>	<b>0.8788</b>	<b>20.5278</b>	<b>6.8433</b>	<b>0.0629</b>	<b>1.8703</b>	<b>0.0672</b>	<b>1.9375</b>	<b>0.5077</b>	<b>0.0641</b>	<b>0.5718</b>		<b>6,774.4988</b>	<b>6,774.4988</b>	<b>0.4618</b>		<b>6,786.0434</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	lb/day										lb/day					

Fugitive Dust					6.8516	0.0000	6.8516	3.1338	0.0000	3.1338			0.0000			0.0000
Off-Road	5.6905	63.2957	36.6834	0.0772		2.7055	2.7055		2.4891	2.4891	0.0000	7,476.0797	7,476.0797	2.4179		7,536.5276
<b>Total</b>	<b>5.6905</b>	<b>63.2957</b>	<b>36.6834</b>	<b>0.0772</b>	<b>6.8516</b>	<b>2.7055</b>	<b>9.5570</b>	<b>3.1338</b>	<b>2.4891</b>	<b>5.6228</b>	<b>0.0000</b>	<b>7,476.0797</b>	<b>7,476.0797</b>	<b>2.4179</b>		<b>7,536.5276</b>

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.6404	20.3647	5.0020	0.0575	1.3114	0.0627	1.3741	0.3595	0.0600	0.4195		6,238.3732	6,238.3732	0.4460		6,249.5235
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.2384	0.1631	1.8413	5.3800e-003	0.5589	4.5200e-003	0.5634	0.1482	4.1600e-003	0.1524		536.1256	536.1256	0.0158		536.5200
<b>Total</b>	<b>0.8788</b>	<b>20.5278</b>	<b>6.8433</b>	<b>0.0629</b>	<b>1.8703</b>	<b>0.0672</b>	<b>1.9375</b>	<b>0.5077</b>	<b>0.0641</b>	<b>0.5718</b>		<b>6,774.4988</b>	<b>6,774.4988</b>	<b>0.4618</b>		<b>6,786.0434</b>

**3.5 Building Construction - 2021**

**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.6530	23.0790	19.5876	0.0351		1.1192	1.1192		1.0608	1.0608		3,265.6455	3,265.6455	0.7662		3,284.8007
<b>Total</b>	<b>2.6530</b>	<b>23.0790</b>	<b>19.5876</b>	<b>0.0351</b>		<b>1.1192</b>	<b>1.1192</b>		<b>1.0608</b>	<b>1.0608</b>		<b>3,265.6455</b>	<b>3,265.6455</b>	<b>0.7662</b>		<b>3,284.8007</b>

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0128	0.4073	0.1000	1.1500e-003	0.0262	1.2500e-003	0.0275	7.1900e-003	1.2000e-003	8.3900e-003		124.7675	124.7675	8.9200e-003		124.9905
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.4768	0.3262	3.6826	0.0108	1.1178	9.0300e-003	1.1268	0.2964	8.3200e-003	0.3048		1,072.2511	1,072.2511	0.0316		1,073.0399
<b>Total</b>	<b>0.4896</b>	<b>0.7334</b>	<b>3.7826</b>	<b>0.0119</b>	<b>1.1440</b>	<b>0.0103</b>	<b>1.1543</b>	<b>0.3036</b>	<b>9.5200e-003</b>	<b>0.3132</b>		<b>1,197.0186</b>	<b>1,197.0186</b>	<b>0.0405</b>		<b>1,198.0304</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	lb/day										lb/day					
Off-Road	2.6530	23.0790	19.5876	0.0351		1.1192	1.1192		1.0608	1.0608	0.0000	3,265.6455	3,265.6455	0.7662		3,284.8007
<b>Total</b>	<b>2.6530</b>	<b>23.0790</b>	<b>19.5876</b>	<b>0.0351</b>		<b>1.1192</b>	<b>1.1192</b>		<b>1.0608</b>	<b>1.0608</b>	<b>0.0000</b>	<b>3,265.6455</b>	<b>3,265.6455</b>	<b>0.7662</b>		<b>3,284.8007</b>

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
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Category	lb/day										lb/day				
Hauling	0.0128	0.4073	0.1000	1.1500e-003	0.0262	1.2500e-003	0.0275	7.1900e-003	1.2000e-003	8.3900e-003		124.7675	124.7675	8.9200e-003	124.9905
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000
Worker	0.4768	0.3262	3.6826	0.0108	1.1178	9.0300e-003	1.1268	0.2964	8.3200e-003	0.3048		1,072.2511	1,072.2511	0.0316	1,073.0399
<b>Total</b>	<b>0.4896</b>	<b>0.7334</b>	<b>3.7826</b>	<b>0.0119</b>	<b>1.1440</b>	<b>0.0103</b>	<b>1.1543</b>	<b>0.3036</b>	<b>9.5200e-003</b>	<b>0.3132</b>		<b>1,197.0186</b>	<b>1,197.0186</b>	<b>0.0405</b>	<b>1,198.0304</b>

### 3.6 Paving - 2021

#### Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.6872	17.0446	19.6218	0.0313		0.8616	0.8616		0.7944	0.7944		3,005.4575	3,005.4575	0.9554		3,029.3421
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
<b>Total</b>	<b>1.6872</b>	<b>17.0446</b>	<b>19.6218</b>	<b>0.0313</b>		<b>0.8616</b>	<b>0.8616</b>		<b>0.7944</b>	<b>0.7944</b>		<b>3,005.4575</b>	<b>3,005.4575</b>	<b>0.9554</b>		<b>3,029.3421</b>

#### Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.2562	8.1459	2.0008	0.0230	0.5246	0.0251	0.5496	0.1438	0.0240	0.1678		2,495.3493	2,495.3493	0.1784		2,499.8094
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.2384	0.1631	1.8413	5.3800e-003	0.5589	4.5200e-003	0.5634	0.1482	4.1600e-003	0.1524		536.1256	536.1256	0.0158		536.5200

<b>Total</b>	<b>0.4946</b>	<b>8.3090</b>	<b>3.8421</b>	<b>0.0284</b>	<b>1.0834</b>	<b>0.0296</b>	<b>1.1130</b>	<b>0.2920</b>	<b>0.0282</b>	<b>0.3202</b>		<b>3,031.474</b>	<b>3,031.4748</b>	<b>0.1942</b>		<b>3,036.329</b>
												<b>8</b>				<b>4</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
<b>Category</b>	<b>lb/day</b>										<b>lb/day</b>					
Off-Road	1.6872	17.0446	19.6218	0.0313		0.8616	0.8616		0.7944	0.7944	0.0000	3,005.4575	3,005.4575	0.9554		3,029.3421
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
<b>Total</b>	<b>1.6872</b>	<b>17.0446</b>	<b>19.6218</b>	<b>0.0313</b>		<b>0.8616</b>	<b>0.8616</b>		<b>0.7944</b>	<b>0.7944</b>	<b>0.0000</b>	<b>3,005.4575</b>	<b>3,005.4575</b>	<b>0.9554</b>		<b>3,029.3421</b>

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
<b>Category</b>	<b>lb/day</b>										<b>lb/day</b>					
Hauling	0.2562	8.1459	2.0008	0.0230	0.5246	0.0251	0.5496	0.1438	0.0240	0.1678		2,495.3493	2,495.3493	0.1784		2,499.8094
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.2384	0.1631	1.8413	5.3800e-003	0.5589	4.5200e-003	0.5634	0.1482	4.1600e-003	0.1524		536.1256	536.1256	0.0158		536.5200
<b>Total</b>	<b>0.4946</b>	<b>8.3090</b>	<b>3.8421</b>	<b>0.0284</b>	<b>1.0834</b>	<b>0.0296</b>	<b>1.1130</b>	<b>0.2920</b>	<b>0.0282</b>	<b>0.3202</b>		<b>3,031.474</b>	<b>3,031.4748</b>	<b>0.1942</b>		<b>3,036.329</b>
												<b>8</b>				<b>4</b>

**3.7 Architectural Coating - 2021**

**Unmitigated Construction On-Site**



	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	2.9187	20.3579	24.2341	0.0396		1.2546	1.2546		1.2546	1.2546		3,752.6407	3,752.6407	0.2575		3,759.0789
<b>Total</b>	<b>2.9187</b>	<b>20.3579</b>	<b>24.2341</b>	<b>0.0396</b>		<b>1.2546</b>	<b>1.2546</b>		<b>1.2546</b>	<b>1.2546</b>		<b>3,752.6407</b>	<b>3,752.6407</b>	<b>0.2575</b>		<b>3,759.0789</b>

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.2562	8.1459	2.0008	0.0230	0.5246	0.0251	0.5496	0.1438	0.0240	0.1678		2,495.3493	2,495.3493	0.1784		2,499.8094
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.2384	0.1631	1.8413	5.3800e-003	0.5589	4.5200e-003	0.5634	0.1482	4.1600e-003	0.1524		536.1256	536.1256	0.0158		536.5200
<b>Total</b>	<b>0.4946</b>	<b>8.3090</b>	<b>3.8421</b>	<b>0.0284</b>	<b>1.0834</b>	<b>0.0296</b>	<b>1.1130</b>	<b>0.2920</b>	<b>0.0282</b>	<b>0.3202</b>		<b>3,031.4748</b>	<b>3,031.4748</b>	<b>0.1942</b>		<b>3,036.3294</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	lb/day										lb/day					

Archit. Coating	0.0000					0.0000	0.0000		0.0000	0.0000		0.0000			0.0000
Off-Road	2.9187	20.3579	24.2341	0.0396		1.2546	1.2546		1.2546	1.2546	0.0000	3,752.6406	3,752.6406	0.2575	3,759.0789
<b>Total</b>	<b>2.9187</b>	<b>20.3579</b>	<b>24.2341</b>	<b>0.0396</b>		<b>1.2546</b>	<b>1.2546</b>		<b>1.2546</b>	<b>1.2546</b>	<b>0.0000</b>	<b>3,752.6406</b>	<b>3,752.6406</b>	<b>0.2575</b>	<b>3,759.0789</b>

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.2562	8.1459	2.0008	0.0230	0.5246	0.0251	0.5496	0.1438	0.0240	0.1678		2,495.3493	2,495.3493	0.1784		2,499.8094
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.2384	0.1631	1.8413	5.3800e-003	0.5589	4.5200e-003	0.5634	0.1482	4.1600e-003	0.1524		536.1256	536.1256	0.0158		536.5200
<b>Total</b>	<b>0.4946</b>	<b>8.3090</b>	<b>3.8421</b>	<b>0.0284</b>	<b>1.0834</b>	<b>0.0296</b>	<b>1.1130</b>	<b>0.2920</b>	<b>0.0282</b>	<b>0.3202</b>		<b>3,031.4748</b>	<b>3,031.4748</b>	<b>0.1942</b>		<b>3,036.3294</b>

LA Housing Element Construction Scenario - Los Angeles-South Coast County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

**LA Housing Element Construction Scenario**

**Los Angeles-South Coast County, Annual**

**1.0 Project Characteristics**

**1.1 Land Usage**

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Apartments Low Rise	35.00	Dwelling Unit	2.19	35,000.00	100
Single Family Housing	8.00	Dwelling Unit	2.60	14,400.00	23

**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>	11			<b>Operational Year</b>	2029
<b>Utility Company</b>	Southern California Edison				
<b>CO2 Intensity (lb/MW hr)</b>	569.37	<b>CH4 Intensity (lb/MW hr)</b>	0.013	<b>N2O Intensity (lb/MW hr)</b>	0.003

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

Project Characteristics - Adjusted to reflect compliance with RPS requirements.

Table Name	Column Name	Default Value	New Value
tblGrading	MaterialExported	0.00	4,574.00
tblProjectCharacteristics	CH4IntensityFactor	0.033	0.013
tblProjectCharacteristics	CO2IntensityFactor	390.98	569.37
tblProjectCharacteristics	N2OIntensityFactor	0.004	0.003

**2.0 Emissions Summary**

**2.1 Overall Construction**



LA Housing Element Construction Scenario - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
1	1-3-2022	4-2-2022	0.8031	0.8031
2	4-3-2022	7-2-2022	0.5767	0.5767
3	7-3-2022	10-2-2022	0.5830	0.5830
4	10-3-2022	1-2-2023	0.5828	0.5828
5	1-3-2023	4-2-2023	0.2632	0.2632
		Highest	0.8031	0.8031

**3.0 Construction Detail**

**Construction Phase**

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	1/3/2022	1/28/2022	5	20	
2	Site Preparation	Site Preparation	1/29/2022	2/4/2022	5	5	
3	Grading	Grading	2/5/2022	2/16/2022	5	8	
4	Building Construction	Building Construction	2/17/2022	1/4/2023	5	230	
5	Paving	Paving	1/5/2023	1/30/2023	5	18	
6	Architectural Coating	Architectural Coating	1/31/2023	2/23/2023	5	18	

**Acres of Grading (Site Preparation Phase): 7.5**

**Acres of Grading (Grading Phase): 8**

**Acres of Paving: 0**

**Residential Indoor: 100,035; Residential Outdoor: 33,345; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0 (Architectural**

**OffRoad Equipment**

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

LA Housing Element Construction Scenario - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

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	1	8.00	158	0.38
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Tractors/Loaders/Backhoes	3	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	1	8.00	130	0.42
Paving	Paving Equipment	2	6.00	132	0.36
Paving	Rollers	2	6.00	80	0.38
Architectural Coating	Air Compressors	1	6.00	78	0.48
Paving	Cement and Mortar Mixers	2	6.00	9	0.56
Paving	Tractors/Loaders/Backhoes	1	8.00	97	0.37

**Trips and VMT**

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	6	15.00	0.00	112.00	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	6	15.00	0.00	572.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	28.00	5.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	8	20.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	6.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.1 Mitigation Measures Construction

3.2 Demolition - 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					0.0122	0.0000	0.0122	1.8400e-003	0.0000	1.8400e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0264	0.2572	0.2059	3.9000e-004		0.0124	0.0124		0.0116	0.0116	0.0000	33.9902	33.9902	9.5500e-003	0.0000	34.2289
<b>Total</b>	<b>0.0264</b>	<b>0.2572</b>	<b>0.2059</b>	<b>3.9000e-004</b>	<b>0.0122</b>	<b>0.0124</b>	<b>0.0246</b>	<b>1.8400e-003</b>	<b>0.0116</b>	<b>0.0134</b>	<b>0.0000</b>	<b>33.9902</b>	<b>33.9902</b>	<b>9.5500e-003</b>	<b>0.0000</b>	<b>34.2289</b>

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	2.6000e-004	9.9100e-003	2.2100e-003	3.0000e-005	9.6000e-004	7.0000e-005	1.0300e-003	2.6000e-004	7.0000e-005	3.3000e-004	0.0000	3.4589	3.4589	1.8000e-004	5.5000e-004	3.6271
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	5.1000e-004	4.3000e-004	5.5700e-003	1.0000e-005	1.6400e-003	1.0000e-005	1.6500e-003	4.4000e-004	1.0000e-005	4.5000e-004	0.0000	1.3606	1.3606	4.0000e-005	4.0000e-005	1.3726
<b>Total</b>	<b>7.7000e-004</b>	<b>0.0103</b>	<b>7.7800e-003</b>	<b>4.0000e-005</b>	<b>2.6000e-003</b>	<b>8.0000e-005</b>	<b>2.6800e-003</b>	<b>7.0000e-004</b>	<b>8.0000e-005</b>	<b>7.8000e-004</b>	<b>0.0000</b>	<b>4.8195</b>	<b>4.8195</b>	<b>2.2000e-004</b>	<b>5.9000e-004</b>	<b>4.9997</b>

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

**Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0122	0.0000	0.0122	1.8400e-003	0.0000	1.8400e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0264	0.2572	0.2059	3.9000e-004		0.0124	0.0124		0.0116	0.0116	0.0000	33.9902	33.9902	9.5500e-003	0.0000	34.2289
<b>Total</b>	<b>0.0264</b>	<b>0.2572</b>	<b>0.2059</b>	<b>3.9000e-004</b>	<b>0.0122</b>	<b>0.0124</b>	<b>0.0246</b>	<b>1.8400e-003</b>	<b>0.0116</b>	<b>0.0134</b>	<b>0.0000</b>	<b>33.9902</b>	<b>33.9902</b>	<b>9.5500e-003</b>	<b>0.0000</b>	<b>34.2289</b>

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	2.6000e-004	9.9100e-003	2.2100e-003	3.0000e-005	9.6000e-004	7.0000e-005	1.0300e-003	2.6000e-004	7.0000e-005	3.3000e-004	0.0000	3.4589	3.4589	1.8000e-004	5.5000e-004	3.6271
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	5.1000e-004	4.3000e-004	5.5700e-003	1.0000e-005	1.6400e-003	1.0000e-005	1.6500e-003	4.4000e-004	1.0000e-005	4.5000e-004	0.0000	1.3606	1.3606	4.0000e-005	4.0000e-005	1.3726
<b>Total</b>	<b>7.7000e-004</b>	<b>0.0103</b>	<b>7.7800e-003</b>	<b>4.0000e-005</b>	<b>2.6000e-003</b>	<b>8.0000e-005</b>	<b>2.6800e-003</b>	<b>7.0000e-004</b>	<b>8.0000e-005</b>	<b>7.8000e-004</b>	<b>0.0000</b>	<b>4.8195</b>	<b>4.8195</b>	<b>2.2000e-004</b>	<b>5.9000e-004</b>	<b>4.9997</b>



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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

**3.3 Site Preparation - 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					0.0491	0.0000	0.0491	0.0253	0.0000	0.0253	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	7.9300e-003	0.0827	0.0492	1.0000e-004		4.0300e-003	4.0300e-003		3.7100e-003	3.7100e-003	0.0000	8.3599	8.3599	2.7000e-003	0.0000	8.4274
<b>Total</b>	<b>7.9300e-003</b>	<b>0.0827</b>	<b>0.0492</b>	<b>1.0000e-004</b>	<b>0.0491</b>	<b>4.0300e-003</b>	<b>0.0532</b>	<b>0.0253</b>	<b>3.7100e-003</b>	<b>0.0290</b>	<b>0.0000</b>	<b>8.3599</b>	<b>8.3599</b>	<b>2.7000e-003</b>	<b>0.0000</b>	<b>8.4274</b>

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	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	1.5000e-004	1.3000e-004	1.6700e-003	0.0000	4.9000e-004	0.0000	5.0000e-004	1.3000e-004	0.0000	1.3000e-004	0.0000	0.4082	0.4082	1.0000e-005	1.0000e-005	0.4118
<b>Total</b>	<b>1.5000e-004</b>	<b>1.3000e-004</b>	<b>1.6700e-003</b>	<b>0.0000</b>	<b>4.9000e-004</b>	<b>0.0000</b>	<b>5.0000e-004</b>	<b>1.3000e-004</b>	<b>0.0000</b>	<b>1.3000e-004</b>	<b>0.0000</b>	<b>0.4082</b>	<b>0.4082</b>	<b>1.0000e-005</b>	<b>1.0000e-005</b>	<b>0.4118</b>

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**Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0491	0.0000	0.0491	0.0253	0.0000	0.0253	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	7.9300e-003	0.0827	0.0492	1.0000e-004		4.0300e-003	4.0300e-003		3.7100e-003	3.7100e-003	0.0000	8.3598	8.3598	2.7000e-003	0.0000	8.4274
<b>Total</b>	<b>7.9300e-003</b>	<b>0.0827</b>	<b>0.0492</b>	<b>1.0000e-004</b>	<b>0.0491</b>	<b>4.0300e-003</b>	<b>0.0532</b>	<b>0.0253</b>	<b>3.7100e-003</b>	<b>0.0290</b>	<b>0.0000</b>	<b>8.3598</b>	<b>8.3598</b>	<b>2.7000e-003</b>	<b>0.0000</b>	<b>8.4274</b>

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	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	1.5000e-004	1.3000e-004	1.6700e-003	0.0000	4.9000e-004	0.0000	5.0000e-004	1.3000e-004	0.0000	1.3000e-004	0.0000	0.4082	0.4082	1.0000e-005	1.0000e-005	0.4118
<b>Total</b>	<b>1.5000e-004</b>	<b>1.3000e-004</b>	<b>1.6700e-003</b>	<b>0.0000</b>	<b>4.9000e-004</b>	<b>0.0000</b>	<b>5.0000e-004</b>	<b>1.3000e-004</b>	<b>0.0000</b>	<b>1.3000e-004</b>	<b>0.0000</b>	<b>0.4082</b>	<b>0.4082</b>	<b>1.0000e-005</b>	<b>1.0000e-005</b>	<b>0.4118</b>

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

**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					0.0286	0.0000	0.0286	0.0137	0.0000	0.0137	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	7.7900e-003	0.0834	0.0611	1.2000e-004		3.7600e-003	3.7600e-003		3.4600e-003	3.4600e-003	0.0000	10.4219	10.4219	3.3700e-003	0.0000	10.5062
<b>Total</b>	<b>7.7900e-003</b>	<b>0.0834</b>	<b>0.0611</b>	<b>1.2000e-004</b>	<b>0.0286</b>	<b>3.7600e-003</b>	<b>0.0324</b>	<b>0.0137</b>	<b>3.4600e-003</b>	<b>0.0172</b>	<b>0.0000</b>	<b>10.4219</b>	<b>10.4219</b>	<b>3.3700e-003</b>	<b>0.0000</b>	<b>10.5062</b>

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	1.3200e-003	0.0506	0.0113	1.8000e-004	4.9200e-003	3.6000e-004	5.2800e-003	1.3500e-003	3.4000e-004	1.6900e-003	0.0000	17.6652	17.6652	9.4000e-004	2.8000e-003	18.5239
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.1000e-004	1.7000e-004	2.2300e-003	1.0000e-005	6.6000e-004	0.0000	6.6000e-004	1.7000e-004	0.0000	1.8000e-004	0.0000	0.5442	0.5442	2.0000e-005	1.0000e-005	0.5490
<b>Total</b>	<b>1.5300e-003</b>	<b>0.0508</b>	<b>0.0135</b>	<b>1.9000e-004</b>	<b>5.5800e-003</b>	<b>3.6000e-004</b>	<b>5.9400e-003</b>	<b>1.5200e-003</b>	<b>3.4000e-004</b>	<b>1.8700e-003</b>	<b>0.0000</b>	<b>18.2095</b>	<b>18.2095</b>	<b>9.6000e-004</b>	<b>2.8100e-003</b>	<b>19.0730</b>

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**Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0286	0.0000	0.0286	0.0137	0.0000	0.0137	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	7.7900e-003	0.0834	0.0611	1.2000e-004		3.7600e-003	3.7600e-003		3.4600e-003	3.4600e-003	0.0000	10.4219	10.4219	3.3700e-003	0.0000	10.5062
<b>Total</b>	<b>7.7900e-003</b>	<b>0.0834</b>	<b>0.0611</b>	<b>1.2000e-004</b>	<b>0.0286</b>	<b>3.7600e-003</b>	<b>0.0324</b>	<b>0.0137</b>	<b>3.4600e-003</b>	<b>0.0172</b>	<b>0.0000</b>	<b>10.4219</b>	<b>10.4219</b>	<b>3.3700e-003</b>	<b>0.0000</b>	<b>10.5062</b>

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	1.3200e-003	0.0506	0.0113	1.8000e-004	4.9200e-003	3.6000e-004	5.2800e-003	1.3500e-003	3.4000e-004	1.6900e-003	0.0000	17.6652	17.6652	9.4000e-004	2.8000e-003	18.5239
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.1000e-004	1.7000e-004	2.2300e-003	1.0000e-005	6.6000e-004	0.0000	6.6000e-004	1.7000e-004	0.0000	1.8000e-004	0.0000	0.5442	0.5442	2.0000e-005	1.0000e-005	0.5490
<b>Total</b>	<b>1.5300e-003</b>	<b>0.0508</b>	<b>0.0135</b>	<b>1.9000e-004</b>	<b>5.5800e-003</b>	<b>3.6000e-004</b>	<b>5.9400e-003</b>	<b>1.5200e-003</b>	<b>3.4000e-004</b>	<b>1.8700e-003</b>	<b>0.0000</b>	<b>18.2095</b>	<b>18.2095</b>	<b>9.6000e-004</b>	<b>2.8100e-003</b>	<b>19.0730</b>

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

**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	0.1937	1.7724	1.8573	3.0600e-003		0.0918	0.0918		0.0864	0.0864	0.0000	263.0082	263.0082	0.0630	0.0000	264.5834
<b>Total</b>	<b>0.1937</b>	<b>1.7724</b>	<b>1.8573</b>	<b>3.0600e-003</b>		<b>0.0918</b>	<b>0.0918</b>		<b>0.0864</b>	<b>0.0864</b>	<b>0.0000</b>	<b>263.0082</b>	<b>263.0082</b>	<b>0.0630</b>	<b>0.0000</b>	<b>264.5834</b>

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	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	1.1100e-003	0.0292	9.6800e-003	1.1000e-004	3.5800e-003	2.7000e-004	3.8400e-003	1.0300e-003	2.5000e-004	1.2900e-003	0.0000	10.8369	10.8369	3.6000e-004	1.5600e-003	11.3117
Worker	0.0109	9.0700e-003	0.1180	3.1000e-004	0.0348	2.3000e-004	0.0351	9.2500e-003	2.1000e-004	9.4600e-003	0.0000	28.8267	28.8267	8.2000e-004	7.8000e-004	29.0805
<b>Total</b>	<b>0.0120</b>	<b>0.0383</b>	<b>0.1277</b>	<b>4.2000e-004</b>	<b>0.0384</b>	<b>5.0000e-004</b>	<b>0.0389</b>	<b>0.0103</b>	<b>4.6000e-004</b>	<b>0.0108</b>	<b>0.0000</b>	<b>39.6635</b>	<b>39.6635</b>	<b>1.1800e-003</b>	<b>2.3400e-003</b>	<b>40.3922</b>

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

**Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1937	1.7724	1.8572	3.0600e-003		0.0918	0.0918		0.0864	0.0864	0.0000	263.0078	263.0078	0.0630	0.0000	264.5831
<b>Total</b>	<b>0.1937</b>	<b>1.7724</b>	<b>1.8572</b>	<b>3.0600e-003</b>		<b>0.0918</b>	<b>0.0918</b>		<b>0.0864</b>	<b>0.0864</b>	<b>0.0000</b>	<b>263.0078</b>	<b>263.0078</b>	<b>0.0630</b>	<b>0.0000</b>	<b>264.5831</b>

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	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	1.1100e-003	0.0292	9.6800e-003	1.1000e-004	3.5800e-003	2.7000e-004	3.8400e-003	1.0300e-003	2.5000e-004	1.2900e-003	0.0000	10.8369	10.8369	3.6000e-004	1.5600e-003	11.3117
Worker	0.0109	9.0700e-003	0.1180	3.1000e-004	0.0348	2.3000e-004	0.0351	9.2500e-003	2.1000e-004	9.4600e-003	0.0000	28.8267	28.8267	8.2000e-004	7.8000e-004	29.0805
<b>Total</b>	<b>0.0120</b>	<b>0.0383</b>	<b>0.1277</b>	<b>4.2000e-004</b>	<b>0.0384</b>	<b>5.0000e-004</b>	<b>0.0389</b>	<b>0.0103</b>	<b>4.6000e-004</b>	<b>0.0108</b>	<b>0.0000</b>	<b>39.6635</b>	<b>39.6635</b>	<b>1.1800e-003</b>	<b>2.3400e-003</b>	<b>40.3922</b>

**3.5 Building Construction - 2023**

**Unmitigated Construction On-Site**

LA Housing Element Construction Scenario - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	2.3600e-003	0.0216	0.0244	4.0000e-005		1.0500e-003	1.0500e-003		9.9000e-004	9.9000e-004	0.0000	3.4771	3.4771	8.3000e-004	0.0000	3.4978
<b>Total</b>	<b>2.3600e-003</b>	<b>0.0216</b>	<b>0.0244</b>	<b>4.0000e-005</b>		<b>1.0500e-003</b>	<b>1.0500e-003</b>		<b>9.9000e-004</b>	<b>9.9000e-004</b>	<b>0.0000</b>	<b>3.4771</b>	<b>3.4771</b>	<b>8.3000e-004</b>	<b>0.0000</b>	<b>3.4978</b>

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	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	1.0000e-005	3.0000e-004	1.1000e-004	0.0000	5.0000e-005	0.0000	5.0000e-005	1.0000e-005	0.0000	2.0000e-005	0.0000	0.1364	0.1364	0.0000	2.0000e-005	0.1423
Worker	1.3000e-004	1.1000e-004	1.4300e-003	0.0000	4.6000e-004	0.0000	4.6000e-004	1.2000e-004	0.0000	1.2000e-004	0.0000	0.3709	0.3709	1.0000e-005	1.0000e-005	0.3740
<b>Total</b>	<b>1.4000e-004</b>	<b>4.1000e-004</b>	<b>1.5400e-003</b>	<b>0.0000</b>	<b>5.1000e-004</b>	<b>0.0000</b>	<b>5.1000e-004</b>	<b>1.3000e-004</b>	<b>0.0000</b>	<b>1.4000e-004</b>	<b>0.0000</b>	<b>0.5073</b>	<b>0.5073</b>	<b>1.0000e-005</b>	<b>3.0000e-005</b>	<b>0.5164</b>

**Mitigated Construction On-Site**

LA Housing Element Construction Scenario - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	2.3600e-003	0.0216	0.0244	4.0000e-005		1.0500e-003	1.0500e-003		9.9000e-004	9.9000e-004	0.0000	3.4771	3.4771	8.3000e-004	0.0000	3.4978
<b>Total</b>	<b>2.3600e-003</b>	<b>0.0216</b>	<b>0.0244</b>	<b>4.0000e-005</b>		<b>1.0500e-003</b>	<b>1.0500e-003</b>		<b>9.9000e-004</b>	<b>9.9000e-004</b>	<b>0.0000</b>	<b>3.4771</b>	<b>3.4771</b>	<b>8.3000e-004</b>	<b>0.0000</b>	<b>3.4978</b>

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	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	1.0000e-005	3.0000e-004	1.1000e-004	0.0000	5.0000e-005	0.0000	5.0000e-005	1.0000e-005	0.0000	2.0000e-005	0.0000	0.1364	0.1364	0.0000	2.0000e-005	0.1423
Worker	1.3000e-004	1.1000e-004	1.4300e-003	0.0000	4.6000e-004	0.0000	4.6000e-004	1.2000e-004	0.0000	1.2000e-004	0.0000	0.3709	0.3709	1.0000e-005	1.0000e-005	0.3740
<b>Total</b>	<b>1.4000e-004</b>	<b>4.1000e-004</b>	<b>1.5400e-003</b>	<b>0.0000</b>	<b>5.1000e-004</b>	<b>0.0000</b>	<b>5.1000e-004</b>	<b>1.3000e-004</b>	<b>0.0000</b>	<b>1.4000e-004</b>	<b>0.0000</b>	<b>0.5073</b>	<b>0.5073</b>	<b>1.0000e-005</b>	<b>3.0000e-005</b>	<b>0.5164</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
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LA Housing Element Construction Scenario - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

Category	tons/yr								MT/yr							
	Off-Road	8.2600e-003	0.0791	0.1097	1.7000e-004		3.9200e-003	3.9200e-003		3.6200e-003	3.6200e-003	0.0000	14.7407	14.7407	4.6300e-003	0.0000
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>	<b>8.2600e-003</b>	<b>0.0791</b>	<b>0.1097</b>	<b>1.7000e-004</b>		<b>3.9200e-003</b>	<b>3.9200e-003</b>		<b>3.6200e-003</b>	<b>3.6200e-003</b>	<b>0.0000</b>	<b>14.7407</b>	<b>14.7407</b>	<b>4.6300e-003</b>	<b>0.0000</b>	<b>14.8565</b>

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	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	5.7000e-004	4.5000e-004	6.1500e-003	2.0000e-005	1.9700e-003	1.0000e-005	1.9800e-003	5.2000e-004	1.0000e-005	5.4000e-004	0.0000	1.5897	1.5897	4.0000e-005	4.0000e-005	1.6029
<b>Total</b>	<b>5.7000e-004</b>	<b>4.5000e-004</b>	<b>6.1500e-003</b>	<b>2.0000e-005</b>	<b>1.9700e-003</b>	<b>1.0000e-005</b>	<b>1.9800e-003</b>	<b>5.2000e-004</b>	<b>1.0000e-005</b>	<b>5.4000e-004</b>	<b>0.0000</b>	<b>1.5897</b>	<b>1.5897</b>	<b>4.0000e-005</b>	<b>4.0000e-005</b>	<b>1.6029</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
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LA Housing Element Construction Scenario - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

Category	tons/yr								MT/yr							
	Off-Road	8.2600e-003	0.0791	0.1097	1.7000e-004		3.9200e-003	3.9200e-003		3.6200e-003	3.6200e-003	0.0000	14.7407	14.7407	4.6300e-003	0.0000
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>	<b>8.2600e-003</b>	<b>0.0791</b>	<b>0.1097</b>	<b>1.7000e-004</b>		<b>3.9200e-003</b>	<b>3.9200e-003</b>		<b>3.6200e-003</b>	<b>3.6200e-003</b>	<b>0.0000</b>	<b>14.7407</b>	<b>14.7407</b>	<b>4.6300e-003</b>	<b>0.0000</b>	<b>14.8565</b>

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	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	5.7000e-004	4.5000e-004	6.1500e-003	2.0000e-005	1.9700e-003	1.0000e-005	1.9800e-003	5.2000e-004	1.0000e-005	5.4000e-004	0.0000	1.5897	1.5897	4.0000e-005	4.0000e-005	1.6029
<b>Total</b>	<b>5.7000e-004</b>	<b>4.5000e-004</b>	<b>6.1500e-003</b>	<b>2.0000e-005</b>	<b>1.9700e-003</b>	<b>1.0000e-005</b>	<b>1.9800e-003</b>	<b>5.2000e-004</b>	<b>1.0000e-005</b>	<b>5.4000e-004</b>	<b>0.0000</b>	<b>1.5897</b>	<b>1.5897</b>	<b>4.0000e-005</b>	<b>4.0000e-005</b>	<b>1.6029</b>

**3.7 Architectural Coating - 2023**

**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
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LA Housing Element Construction Scenario - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

Category	tons/yr								MT/yr							
Archit. Coating	0.1546					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Off-Road	1.7200e-003	0.0117	0.0163	3.0000e-005		6.4000e-004	6.4000e-004		6.4000e-004	6.4000e-004	0.0000	2.2979	2.2979	1.4000e-004	0.0000	2.3014
<b>Total</b>	<b>0.1563</b>	<b>0.0117</b>	<b>0.0163</b>	<b>3.0000e-005</b>		<b>6.4000e-004</b>	<b>6.4000e-004</b>		<b>6.4000e-004</b>	<b>6.4000e-004</b>	<b>0.0000</b>	<b>2.2979</b>	<b>2.2979</b>	<b>1.4000e-004</b>	<b>0.0000</b>	<b>2.3014</b>

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	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	1.7000e-004	1.4000e-004	1.8400e-003	1.0000e-005	5.9000e-004	0.0000	6.0000e-004	1.6000e-004	0.0000	1.6000e-004	0.0000	0.4769	0.4769	1.0000e-005	1.0000e-005	0.4809
<b>Total</b>	<b>1.7000e-004</b>	<b>1.4000e-004</b>	<b>1.8400e-003</b>	<b>1.0000e-005</b>	<b>5.9000e-004</b>	<b>0.0000</b>	<b>6.0000e-004</b>	<b>1.6000e-004</b>	<b>0.0000</b>	<b>1.6000e-004</b>	<b>0.0000</b>	<b>0.4769</b>	<b>0.4769</b>	<b>1.0000e-005</b>	<b>1.0000e-005</b>	<b>0.4809</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
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LA Housing Element Construction Scenario - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

Category	tons/yr										MT/yr					
	Archit. Coating	0.1546					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	1.7200e-003	0.0117	0.0163	3.0000e-005		6.4000e-004	6.4000e-004		6.4000e-004	6.4000e-004	0.0000	2.2979	2.2979	1.4000e-004	0.0000	2.3014
<b>Total</b>	<b>0.1563</b>	<b>0.0117</b>	<b>0.0163</b>	<b>3.0000e-005</b>		<b>6.4000e-004</b>	<b>6.4000e-004</b>		<b>6.4000e-004</b>	<b>6.4000e-004</b>	<b>0.0000</b>	<b>2.2979</b>	<b>2.2979</b>	<b>1.4000e-004</b>	<b>0.0000</b>	<b>2.3014</b>

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	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	1.7000e-004	1.4000e-004	1.8400e-003	1.0000e-005	5.9000e-004	0.0000	6.0000e-004	1.6000e-004	0.0000	1.6000e-004	0.0000	0.4769	0.4769	1.0000e-005	1.0000e-005	0.4809
<b>Total</b>	<b>1.7000e-004</b>	<b>1.4000e-004</b>	<b>1.8400e-003</b>	<b>1.0000e-005</b>	<b>5.9000e-004</b>	<b>0.0000</b>	<b>6.0000e-004</b>	<b>1.6000e-004</b>	<b>0.0000</b>	<b>1.6000e-004</b>	<b>0.0000</b>	<b>0.4769</b>	<b>0.4769</b>	<b>1.0000e-005</b>	<b>1.0000e-005</b>	<b>0.4809</b>

LA Housing Element - Los Angeles-South Coast County, Summer

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

**LA Housing Element  
Los Angeles-South Coast County, Summer**

**1.0 Project Characteristics**

**1.1 Land Usage**

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Apartments Low Rise	343,407.00	Dwelling Unit	1,000.00	343,407,000.00	982144
Single Family Housing	76,920.00	Dwelling Unit	1,000.00	138,456,000.00	219991

**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>	11			<b>Operational Year</b>	2029
<b>Utility Company</b>	Southern California Edison				
<b>CO2 Intensity (lb/MWhr)</b>	377.41	<b>CH4 Intensity (lb/MWhr)</b>	0.016	<b>N2O Intensity (lb/MWhr)</b>	0.003

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

Project Characteristics - Adjusted to reflect comply with RPS requirements.

Vehicle Trips - Traffic Data

Woodstoves - SCAQMD Rule 445; new development may not have a wood-burning fireplace.

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	11,000.00	10.00
tblConstructionPhase	NumDays	155,000.00	10.00
tblConstructionPhase	NumDays	10,000.00	10.00
tblConstructionPhase	NumDays	15,500.00	10.00
tblConstructionPhase	NumDays	11,000.00	10.00
tblConstructionPhase	NumDays	6,000.00	10.00
tblFireplaces	NumberWood	17,170.35	0.00

LA Housing Element - Los Angeles-South Coast County, Summer

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

tblFireplaces	NumberWood	3,846.00	0.00
tblGrading	AcresOfGrading	30.00	46,500.00
tblGrading	AcresOfGrading	15.00	9,000.00
tblLandUse	LotAcreage	21,462.94	1,000.00
tblLandUse	LotAcreage	24,974.03	1,000.00
tblProjectCharacteristics	CH4IntensityFactor	0.033	0.016
tblProjectCharacteristics	CO2IntensityFactor	390.98	377.41
tblProjectCharacteristics	N2OIntensityFactor	0.004	0.003
tblVehicleTrips	DV_TP	11.00	0.00
tblVehicleTrips	HO_TL	8.70	7.96
tblVehicleTrips	HS_TL	5.90	7.96
tblVehicleTrips	HW_TL	14.70	7.96
tblVehicleTrips	PB_TP	3.00	0.00
tblVehicleTrips	PR_TP	86.00	100.00
tblVehicleTrips	ST_TR	8.14	0.00
tblVehicleTrips	ST_TR	9.54	-1.69
tblVehicleTrips	SU_TR	6.28	0.00
tblVehicleTrips	SU_TR	8.55	-1.69
tblVehicleTrips	WD_TR	7.32	0.00
tblVehicleTrips	WD_TR	9.44	-1.69

**2.0 Emissions Summary**

**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
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LA Housing Element - Los Angeles-South Coast County, Summer

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

Category	lb/day										lb/day					
Area	23,444.972 5	8,006.3114	140,189.570 5	375.7877		17,477.760 4	17,477.7604		17,477.760 4	17,477.7604	2,480,617.9 638	7,628,326.5 425	10,108,944. 5063	11,801.191 7	138.7079	10,445,309. 2566
Energy	196.4466	1,678.7256	714.3513	10.7153		135.7268	135.7268		135.7268	135.7268		2,143,053.9 400	2,143,053.9 400	41.0752	39.2893	2,155,789.0 381
Mobile	-317.1338	-283.9374	-2,997.0430	-6.6525	-793.2436	-4.3897	-797.6333	-211.3375	-4.0797	-215.4172		-	-	-46.2742	-27.9418	-
												713,646.85	713,646.85			723,130.35
<b>Total</b>	<b>23,324.285 2</b>	<b>9,401.0995</b>	<b>137,906.878 9</b>	<b>379.8505</b>	<b>-793.2436</b>	<b>17,609.097 5</b>	<b>16,815.8539</b>	<b>-211.3375</b>	<b>17,609.407 5</b>	<b>17,398.0700</b>	<b>2,480,617.9 638</b>	<b>9,057,733.6 243</b>	<b>11,538,351. 5880</b>	<b>11,795.992 7</b>	<b>150.0555</b>	<b>11,877,967. 9363</b>

**Mitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	23,444.972 5	8,006.3114	140,189.570 5	375.7877		17,477.760 4	17,477.7604		17,477.760 4	17,477.7604	2,480,617.9 638	7,628,326.5 425	10,108,944. 5063	11,801.191 7	138.7079	10,445,309. 2566
Energy	196.4466	1,678.7256	714.3513	10.7153		135.7268	135.7268		135.7268	135.7268		2,143,053.9 400	2,143,053.9 400	41.0752	39.2893	2,155,789.0 381
Mobile	-317.1338	-283.9374	-2,997.0430	-6.6525	-793.2436	-4.3897	-797.6333	-211.3375	-4.0797	-215.4172		-	-	-46.2742	-27.9418	-
												713,646.85	713,646.85			723,130.35
<b>Total</b>	<b>23,324.285 2</b>	<b>9,401.0995</b>	<b>137,906.878 9</b>	<b>379.8505</b>	<b>-793.2436</b>	<b>17,609.097 5</b>	<b>16,815.8539</b>	<b>-211.3375</b>	<b>17,609.407 5</b>	<b>17,398.0700</b>	<b>2,480,617.9 638</b>	<b>9,057,733.6 243</b>	<b>11,538,351. 5880</b>	<b>11,795.992 7</b>	<b>150.0555</b>	<b>11,877,967. 9363</b>

	ROG	NOx	CO	SO2	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

**4.0 Operational Detail - Mobile**

**4.1 Mitigation Measures Mobile**

LA Housing Element - Los Angeles-South Coast County, Summer

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
lb/day											lb/day					
Mitigated	-317.1338	-283.9374	-2,997.0430	-6.6525	-793.2436	-4.3897	-797.6333	-211.3375	-4.0797	-215.4172	-	-	-	-46.2742	-27.9418	-
Unmitigated	-317.1338	-283.9374	-2,997.0430	-6.6525	-793.2436	-4.3897	-797.6333	-211.3375	-4.0797	-215.4172	-	-	-	-46.2742	-27.9418	-

**4.2 Trip Summary Information**

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Apartments Low Rise	0.00	0.00	0.00		
Single Family Housing	-129,994.80	-129,994.80	-129,994.80	-376,652,133	-376,652,133
<b>Total</b>	<b>-129,994.80</b>	<b>-129,994.80</b>	<b>-129,994.80</b>	<b>-376,652,133</b>	<b>-376,652,133</b>

**4.3 Trip Type Information**

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
Single Family Housing	7.96	7.96	7.96	40.20	19.20	40.60	100	0	0

**4.4 Fleet Mix**

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Low Rise	0.531474	0.067154	0.192702	0.126421	0.024086	0.006875	0.011564	0.007937	0.000940	0.000574	0.026268	0.000718	0.003288
Single Family Housing	0.531474	0.067154	0.192702	0.126421	0.024086	0.006875	0.011564	0.007937	0.000940	0.000574	0.026268	0.000718	0.003288

**5.0 Energy Detail**

Historical Energy Use: N

**5.1 Mitigation Measures Energy**



LA Housing Element - Los Angeles-South Coast County, Summer

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	196.4466	1,678.7256	714.3513	10.7153		135.7268	135.7268		135.7268	135.7268		2,143,053.9400	2,143,053.9400	41.0752	39.2893	2,155,789.0381
NaturalGas Unmitigated	196.4466	1,678.7256	714.3513	10.7153		135.7268	135.7268		135.7268	135.7268		2,143,053.9400	2,143,053.9400	41.0752	39.2893	2,155,789.0381

**5.2 Energy by Land Use - NaturalGas**

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Apartments Low Rise	1.28704e+007	138.7984	1,186.0953	504.7214	7.5708		95.8971	95.8971		95.8971	95.8971		1,514,164.2017	1,514,164.2017	29.0215	27.7597	1,523,162.1224
Single Family Housing	5.34556e+006	57.6482	492.6303	209.6299	3.1445		39.8297	39.8297		39.8297	39.8297		628,889.7383	628,889.7383	12.0537	11.5297	632,626.9156
<b>Total</b>		<b>196.4466</b>	<b>1,678.7256</b>	<b>714.3513</b>	<b>10.7153</b>		<b>135.7268</b>	<b>135.7268</b>		<b>135.7268</b>	<b>135.7268</b>		<b>2,143,053.9400</b>	<b>2,143,053.9400</b>	<b>41.0752</b>	<b>39.2893</b>	<b>2,155,789.0381</b>

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
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LA Housing Element - Los Angeles-South Coast County, Summer

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

Land Use	kBTU/yr	lb/day										lb/day					
Apartments Low Rise	12870.4	138.7984	1,186.0953	504.7214	7.5708		95.8971	95.8971		95.8971	95.8971		1,514,164.2017	1,514,164.2017	29.0215	27.7597	1,523,162.1224
Single Family Housing	5345.56	57.6482	492.6303	209.6299	3.1445		39.8297	39.8297		39.8297	39.8297		628,889.7383	628,889.7383	12.0537	11.5297	632,626.9156
<b>Total</b>		<b>196.4466</b>	<b>1,678.7256</b>	<b>714.3513</b>	<b>10.7153</b>		<b>135.7268</b>	<b>135.7268</b>		<b>135.7268</b>	<b>135.7268</b>		<b>2,143,053.9400</b>	<b>2,143,053.9400</b>	<b>41.0752</b>	<b>39.2893</b>	<b>2,155,789.0381</b>

**6.0 Area Detail**

**6.1 Mitigation Measures Area**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	23,444.9725	8,006.3114	140,189.5705	375.7877		17,477.7604	17,477.7604		17,477.7604	17,477.7604	2,480,617.9638	7,628,326.5425	10,108,944.5063	11,801.1917	138.7079	10,445,309.2566
Unmitigated	23,444.9725	8,006.3114	140,189.5705	375.7877		17,477.7604	17,477.7604		17,477.7604	17,477.7604	2,480,617.9638	7,628,326.5425	10,108,944.5063	11,801.1917	138.7079	10,445,309.2566

**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
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LA Housing Element - Los Angeles-South Coast County, Summer

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

SubCategory	lb/day								lb/day							
Architectural Coating	826.0650					0.0000	0.0000		0.0000	0.0000			0.0000		0.0000	
Consumer Products	9,540.8874					0.0000	0.0000		0.0000	0.0000			0.0000		0.0000	
Hearth	12,037.8290	7,607.2462	105,544.9167	373.9565		17,285.5276	17,285.5276		17,285.5276	17,285.5276	2,480,617.9638	7,565,886.0000	10,046,503.9638	11,741.3976	138.7079	10,381,373.8611
Landscaping	1,040.1910	399.0652	34,644.6538	1.8312		192.2329	192.2329		192.2329	192.2329		62,440.5425	62,440.5425	59.7941		63,935.3955
<b>Total</b>	<b>23,444.9725</b>	<b>8,006.3114</b>	<b>140,189.5706</b>	<b>375.7877</b>		<b>17,477.7604</b>	<b>17,477.7604</b>		<b>17,477.7604</b>	<b>17,477.7604</b>	<b>2,480,617.9638</b>	<b>7,628,326.5425</b>	<b>10,108,944.5063</b>	<b>11,801.1917</b>	<b>138.7079</b>	<b>10,445,309.2566</b>

**Mitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	826.0650					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	9,540.8874					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	12,037.8290	7,607.2462	105,544.9167	373.9565		17,285.5276	17,285.5276		17,285.5276	17,285.5276	2,480,617.9638	7,565,886.0000	10,046,503.9638	11,741.3976	138.7079	10,381,373.8611
Landscaping	1,040.1910	399.0652	34,644.6538	1.8312		192.2329	192.2329		192.2329	192.2329		62,440.5425	62,440.5425	59.7941		63,935.3955
<b>Total</b>	<b>23,444.9725</b>	<b>8,006.3114</b>	<b>140,189.5706</b>	<b>375.7877</b>		<b>17,477.7604</b>	<b>17,477.7604</b>		<b>17,477.7604</b>	<b>17,477.7604</b>	<b>2,480,617.9638</b>	<b>7,628,326.5425</b>	<b>10,108,944.5063</b>	<b>11,801.1917</b>	<b>138.7079</b>	<b>10,445,309.2566</b>

**7.0 Water Detail**

**7.1 Mitigation Measures Water**

LA Housing Element - Los Angeles-South Coast County, Summer

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

**8.0 Waste Detail**

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**8.1 Mitigation Measures Waste**

**9.0 Operational Offroad**

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

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**Fire Pumps and Emergency Generators**

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

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
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**User Defined Equipment**

Equipment Type	Number
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**11.0 Vegetation**

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LA Housing Element - Los Angeles-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

**LA Housing Element**  
Los Angeles-South Coast County, Winter

**1.0 Project Characteristics**

**1.1 Land Usage**

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Apartments Low Rise	343,407.00	Dwelling Unit	1,000.00	343,407,000.00	982144
Single Family Housing	76,920.00	Dwelling Unit	1,000.00	138,456,000.00	219991

**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>	11			<b>Operational Year</b>	2029
<b>Utility Company</b>	Southern California Edison				
<b>CO2 Intensity (lb/MWhr)</b>	377.41	<b>CH4 Intensity (lb/MWhr)</b>	0.016	<b>N2O Intensity (lb/MWhr)</b>	0.003

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

Project Characteristics - Adjusted to reflect comply with RPS requirements.

Vehicle Trips - Traffic Data

Woodstoves - SCAQMD Rule 445; new development may not have a wood-burning fireplace.

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	11,000.00	10.00
tblConstructionPhase	NumDays	155,000.00	10.00
tblConstructionPhase	NumDays	10,000.00	10.00
tblConstructionPhase	NumDays	15,500.00	10.00
tblConstructionPhase	NumDays	11,000.00	10.00
tblConstructionPhase	NumDays	6,000.00	10.00
tblFireplaces	NumberWood	17,170.35	0.00

LA Housing Element - Los Angeles-South Coast County, Winter

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

tblFireplaces	NumberWood	3,846.00	0.00
tblGrading	AcresOfGrading	30.00	46,500.00
tblGrading	AcresOfGrading	15.00	9,000.00
tblLandUse	LotAcreage	21,462.94	1,000.00
tblLandUse	LotAcreage	24,974.03	1,000.00
tblProjectCharacteristics	CH4IntensityFactor	0.033	0.016
tblProjectCharacteristics	CO2IntensityFactor	390.98	377.41
tblProjectCharacteristics	N2OIntensityFactor	0.004	0.003
tblVehicleTrips	DV_TP	11.00	0.00
tblVehicleTrips	HO_TL	8.70	7.96
tblVehicleTrips	HS_TL	5.90	7.96
tblVehicleTrips	HW_TL	14.70	7.96
tblVehicleTrips	PB_TP	3.00	0.00
tblVehicleTrips	PR_TP	86.00	100.00
tblVehicleTrips	ST_TR	8.14	0.00
tblVehicleTrips	ST_TR	9.54	-1.69
tblVehicleTrips	SU_TR	6.28	0.00
tblVehicleTrips	SU_TR	8.55	-1.69
tblVehicleTrips	WD_TR	7.32	0.00
tblVehicleTrips	WD_TR	9.44	-1.69

**2.0 Emissions Summary**

**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
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LA Housing Element - Los Angeles-South Coast County, Winter

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

Category	lb/day										lb/day					
Area	23,444.972 5	8,006.3114	140,189.570 5	375.7877		17,477.760 4	17,477.7604		17,477.760 4	17,477.7604	2,480,617.9 638	7,628,326.5 425	10,108,944. 5063	11,801.191 7	138.7079	10,445,309. 2566
Energy	196.4466	1,678.7256	714.3513	10.7153		135.7268	135.7268		135.7268	135.7268		2,143,053.9 400	2,143,053.9 400	41.0752	39.2893	2,155,789.0 381
Mobile	-310.3819	-306.1979	-2,968.3183	-6.3778	-793.2436	-4.3916	-797.6352	-211.3375	-4.0815	-215.4191		-	-	-47.6128	-29.1095	-
												684,052.16	684,052.16			693,917.11
<b>Total</b>	<b>23,331.037 2</b>	<b>9,378.8390</b>	<b>137,935.603 6</b>	<b>380.1252</b>	<b>-793.2436</b>	<b>17,609.095 6</b>	<b>16,815.8520</b>	<b>-211.3375</b>	<b>17,609.405 6</b>	<b>17,398.0681</b>	<b>2,480,617.9 638</b>	<b>9,087,328.3 195</b>	<b>11,567,946. 2832</b>	<b>11,794.654 1</b>	<b>148.8877</b>	<b>11,907,181. 1823</b>

**Mitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	23,444.972 5	8,006.3114	140,189.570 5	375.7877		17,477.760 4	17,477.7604		17,477.760 4	17,477.7604	2,480,617.9 638	7,628,326.5 425	10,108,944. 5063	11,801.191 7	138.7079	10,445,309. 2566
Energy	196.4466	1,678.7256	714.3513	10.7153		135.7268	135.7268		135.7268	135.7268		2,143,053.9 400	2,143,053.9 400	41.0752	39.2893	2,155,789.0 381
Mobile	-310.3819	-306.1979	-2,968.3183	-6.3778	-793.2436	-4.3916	-797.6352	-211.3375	-4.0815	-215.4191		-	-	-47.6128	-29.1095	-
												684,052.16	684,052.16			693,917.11
<b>Total</b>	<b>23,331.037 2</b>	<b>9,378.8390</b>	<b>137,935.603 6</b>	<b>380.1252</b>	<b>-793.2436</b>	<b>17,609.095 6</b>	<b>16,815.8520</b>	<b>-211.3375</b>	<b>17,609.405 6</b>	<b>17,398.0681</b>	<b>2,480,617.9 638</b>	<b>9,087,328.3 195</b>	<b>11,567,946. 2832</b>	<b>11,794.654 1</b>	<b>148.8877</b>	<b>11,907,181. 1823</b>

	ROG	NOx	CO	SO2	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

**4.0 Operational Detail - Mobile**

**4.1 Mitigation Measures Mobile**

LA Housing Element - Los Angeles-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
lb/day											lb/day					
Mitigated	-310.3819	-306.1979	-2,968.3183	-6.3778	-793.2436	-4.3916	-797.6352	-211.3375	-4.0815	-215.4191	-	-	-684.05216	-47.6128	-29.1095	-
Unmitigated	-310.3819	-306.1979	-2,968.3183	-6.3778	-793.2436	-4.3916	-797.6352	-211.3375	-4.0815	-215.4191	-	-	-684.05216	-47.6128	-29.1095	-

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Apartments Low Rise	0.00	0.00	0.00		
Single Family Housing	-129,994.80	-129,994.80	-129,994.80	-376,652,133	-376,652,133
Total	-129,994.80	-129,994.80	-129,994.80	-376,652,133	-376,652,133

4.3 Trip Type Information

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
Single Family Housing	7.96	7.96	7.96	40.20	19.20	40.60	100	0	0

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Low Rise	0.531474	0.067154	0.192702	0.126421	0.024086	0.006875	0.011564	0.007937	0.000940	0.000574	0.026268	0.000718	0.003288
Single Family Housing	0.531474	0.067154	0.192702	0.126421	0.024086	0.006875	0.011564	0.007937	0.000940	0.000574	0.026268	0.000718	0.003288

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy



LA Housing Element - Los Angeles-South Coast County, Winter

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	196.4466	1,678.7256	714.3513	10.7153		135.7268	135.7268		135.7268	135.7268		2,143,053.9400	2,143,053.9400	41.0752	39.2893	2,155,789.0381
NaturalGas Unmitigated	196.4466	1,678.7256	714.3513	10.7153		135.7268	135.7268		135.7268	135.7268		2,143,053.9400	2,143,053.9400	41.0752	39.2893	2,155,789.0381

**5.2 Energy by Land Use - NaturalGas**

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Apartments Low Rise	1.28704e+007	138.7984	1,186.0953	504.7214	7.5708		95.8971	95.8971		95.8971	95.8971		1,514,164.2017	1,514,164.2017	29.0215	27.7597	1,523,162.1224
Single Family Housing	5.34556e+006	57.6482	492.6303	209.6299	3.1445		39.8297	39.8297		39.8297	39.8297		628,889.7383	628,889.7383	12.0537	11.5297	632,626.9156
<b>Total</b>		<b>196.4466</b>	<b>1,678.7256</b>	<b>714.3513</b>	<b>10.7153</b>		<b>135.7268</b>	<b>135.7268</b>		<b>135.7268</b>	<b>135.7268</b>		<b>2,143,053.9400</b>	<b>2,143,053.9400</b>	<b>41.0752</b>	<b>39.2893</b>	<b>2,155,789.0381</b>

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
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LA Housing Element - Los Angeles-South Coast County, Winter

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

Land Use	kBTU/yr	lb/day										lb/day					
Apartments Low Rise	12870.4	138.7984	1,186.0953	504.7214	7.5708		95.8971	95.8971		95.8971	95.8971		1,514,164.2017	1,514,164.2017	29.0215	27.7597	1,523,162.1224
Single Family Housing	5345.56	57.6482	492.6303	209.6299	3.1445		39.8297	39.8297		39.8297	39.8297		628,889.7383	628,889.7383	12.0537	11.5297	632,626.9156
<b>Total</b>		<b>196.4466</b>	<b>1,678.7256</b>	<b>714.3513</b>	<b>10.7153</b>		<b>135.7268</b>	<b>135.7268</b>		<b>135.7268</b>	<b>135.7268</b>		<b>2,143,053.9400</b>	<b>2,143,053.9400</b>	<b>41.0752</b>	<b>39.2893</b>	<b>2,155,789.0381</b>

**6.0 Area Detail**

**6.1 Mitigation Measures Area**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	23,444.9725	8,006.3114	140,189.5705	375.7877		17,477.7604	17,477.7604		17,477.7604	17,477.7604	2,480,617.9638	7,628,326.5425	10,108,944.5063	11,801.1917	138.7079	10,445,309.2566
Unmitigated	23,444.9725	8,006.3114	140,189.5705	375.7877		17,477.7604	17,477.7604		17,477.7604	17,477.7604	2,480,617.9638	7,628,326.5425	10,108,944.5063	11,801.1917	138.7079	10,445,309.2566

**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
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LA Housing Element - Los Angeles-South Coast County, Winter

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

SubCategory	lb/day								lb/day							
Architectural Coating	826.0650					0.0000	0.0000		0.0000	0.0000			0.0000		0.0000	
Consumer Products	9,540.8874					0.0000	0.0000		0.0000	0.0000			0.0000		0.0000	
Hearth	12,037.8290	7,607.2462	105,544.9167	373.9565		17,285.5276	17,285.5276		17,285.5276	17,285.5276	2,480,617.9638	7,565,886.0000	10,046,503.9638	11,741.3976	138.7079	10,381,373.8611
Landscaping	1,040.1910	399.0652	34,644.6538	1.8312		192.2329	192.2329		192.2329	192.2329		62,440.5425	62,440.5425	59.7941		63,935.3955
<b>Total</b>	<b>23,444.9725</b>	<b>8,006.3114</b>	<b>140,189.5706</b>	<b>375.7877</b>		<b>17,477.7604</b>	<b>17,477.7604</b>		<b>17,477.7604</b>	<b>17,477.7604</b>	<b>2,480,617.9638</b>	<b>7,628,326.5425</b>	<b>10,108,944.5063</b>	<b>11,801.1917</b>	<b>138.7079</b>	<b>10,445,309.2566</b>

**Mitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	826.0650					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	9,540.8874					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	12,037.8290	7,607.2462	105,544.9167	373.9565		17,285.5276	17,285.5276		17,285.5276	17,285.5276	2,480,617.9638	7,565,886.0000	10,046,503.9638	11,741.3976	138.7079	10,381,373.8611
Landscaping	1,040.1910	399.0652	34,644.6538	1.8312		192.2329	192.2329		192.2329	192.2329		62,440.5425	62,440.5425	59.7941		63,935.3955
<b>Total</b>	<b>23,444.9725</b>	<b>8,006.3114</b>	<b>140,189.5706</b>	<b>375.7877</b>		<b>17,477.7604</b>	<b>17,477.7604</b>		<b>17,477.7604</b>	<b>17,477.7604</b>	<b>2,480,617.9638</b>	<b>7,628,326.5425</b>	<b>10,108,944.5063</b>	<b>11,801.1917</b>	<b>138.7079</b>	<b>10,445,309.2566</b>

**7.0 Water Detail**

**7.1 Mitigation Measures Water**

LA Housing Element - Los Angeles-South Coast County, Winter

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

**8.0 Waste Detail**

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**8.1 Mitigation Measures Waste**

**9.0 Operational Offroad**

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

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**Fire Pumps and Emergency Generators**

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

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
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**User Defined Equipment**

Equipment Type	Number
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**11.0 Vegetation**

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Sample Scenario - 612 Multifamily Units Operation - Los Angeles-South Coast County, Winter

**Sample Scenario - 612 Multifamily Units Operation**  
**Los Angeles-South Coast County, Winter**

**1.0 Project Characteristics**

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**1.1 Land Usage**

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Apartments Low Rise	612.00	Dwelling Unit	38.25	612,000.00	1750

**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>	11	<b>Operational Year</b>	2021		
<b>Utility Company</b>	Los Angeles Department of Water & Power				
<b>CO2 Intensity (lb/MWhr)</b>	1227.89	<b>CH4 Intensity (lb/MWhr)</b>	0.029	<b>N2O Intensity (lb/MWhr)</b>	0.006

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

Woodstoves - SCAQMD Rule 445; new development may not have a wood-burning fireplace.

Table Name	Column Name	Default Value	New Value
tblFireplaces	NumberWood	30.60	0.00

**2.0 Emissions Summary**

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**2.2 Overall Operational**  
**Unmitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	32.2271	11.6603	204.2749	0.5472		25.4468	25.4468		25.4468	25.4468	3,611.8027	11,106.9140	14,718.7167	17.1837	0.2020	15,208.4929
Energy	0.2553	2.1812	0.9282	0.0139		0.1764	0.1764		0.1764	0.1764		2,784.5398	2,784.5398	0.0534	0.0511	2,801.0870
Mobile	8.2601	41.0830	110.7336	0.3828	31.8404	0.3332	32.1736	8.5213	0.3111	8.8325		38,944.2401	38,944.2401	2.1155		38,997.1280
<b>Total</b>	<b>40.7424</b>	<b>54.9245</b>	<b>315.9366</b>	<b>0.9439</b>	<b>31.8404</b>	<b>25.9564</b>	<b>57.7967</b>	<b>8.5213</b>	<b>25.9343</b>	<b>34.4556</b>	<b>3,611.8027</b>	<b>52,835.6940</b>	<b>56,447.4967</b>	<b>19.3526</b>	<b>0.2530</b>	<b>57,006.7079</b>

### Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	32.2271	11.6603	204.2749	0.5472		25.4468	25.4468		25.4468	25.4468	3,611.8027	11,106.9140	14,718.7167	17.1837	0.2020	15,208.4929
Energy	0.2553	2.1812	0.9282	0.0139		0.1764	0.1764		0.1764	0.1764		2,784.5398	2,784.5398	0.0534	0.0511	2,801.0870
Mobile	8.2601	41.0830	110.7336	0.3828	31.8404	0.3332	32.1736	8.5213	0.3111	8.8325		38,944.2401	38,944.2401	2.1155		38,997.1280
<b>Total</b>	<b>40.7424</b>	<b>54.9245</b>	<b>315.9366</b>	<b>0.9439</b>	<b>31.8404</b>	<b>25.9564</b>	<b>57.7967</b>	<b>8.5213</b>	<b>25.9343</b>	<b>34.4556</b>	<b>3,611.8027</b>	<b>52,835.6940</b>	<b>56,447.4967</b>	<b>19.3526</b>	<b>0.2530</b>	<b>57,006.7079</b>

	ROG	NOx	CO	SO2	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

## 4.0 Operational Detail - Mobile

### 4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	8.2601	41.0830	110.7336	0.3828	31.8404	0.3332	32.1736	8.5213	0.3111	8.8325		38,944.2401	38,944.2401	2.1155		38,997.1280
Unmitigated	8.2601	41.0830	110.7336	0.3828	31.8404	0.3332	32.1736	8.5213	0.3111	8.8325		38,944.2401	38,944.2401	2.1155		38,997.1280

#### 4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Apartments Low Rise	4,033.08	4,381.92	3714.84	13,796,585	13,796,585
Total	4,033.08	4,381.92	3,714.84	13,796,585	13,796,585

#### 4.3 Trip Type Information

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

#### 4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Low Rise	0.547192	0.045177	0.202743	0.121510	0.016147	0.006143	0.019743	0.029945	0.002479	0.002270	0.005078	0.000682	0.000891

### 5.0 Energy Detail

Historical Energy Use: N

#### 5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.2553	2.1812	0.9282	0.0139		0.1764	0.1764		0.1764	0.1764		2,784.5398	2,784.5398	0.0534	0.0511	2,801.0870
NaturalGas Unmitigated	0.2553	2.1812	0.9282	0.0139		0.1764	0.1764		0.1764	0.1764		2,784.5398	2,784.5398	0.0534	0.0511	2,801.0870

## 5.2 Energy by Land Use - NaturalGas

### Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Apartments Low Rise	23668.6	0.2553	2.1812	0.9282	0.0139		0.1764	0.1764		0.1764	0.1764		2,784.5398	2,784.5398	0.0534	0.0511	2,801.0870
<b>Total</b>		<b>0.2553</b>	<b>2.1812</b>	<b>0.9282</b>	<b>0.0139</b>		<b>0.1764</b>	<b>0.1764</b>		<b>0.1764</b>	<b>0.1764</b>		<b>2,784.5398</b>	<b>2,784.5398</b>	<b>0.0534</b>	<b>0.0511</b>	<b>2,801.0870</b>

### Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Apartments Low Rise	23.6686	0.2553	2.1812	0.9282	0.0139		0.1764	0.1764		0.1764	0.1764		2,784.5398	2,784.5398	0.0534	0.0511	2,801.0870



Total		0.2553	2.1812	0.9282	0.0139		0.1764	0.1764		0.1764	0.1764		2,784.5398	2,784.5398	0.0534	0.0511	2,801.0870
														8			

## 6.0 Area Detail

### 6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	32.2271	11.6603	204.2749	0.5472		25.4468	25.4468		25.4468	25.4468	3,611.8027	11,106.9140	14,718.7167	17.1837	0.2020	15,208.4929
Unmitigated	32.2271	11.6603	204.2749	0.5472		25.4468	25.4468		25.4468	25.4468	3,611.8027	11,106.9140	14,718.7167	17.1837	0.2020	15,208.4929

### 6.2 Area by SubCategory

#### Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	1.0492					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	12.1176					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	17.5272	11.0762	153.6744	0.5445		25.1679	25.1679		25.1679	25.1679	3,611.8027	11,016.0000	14,627.8027	17.0956	0.2020	15,115.3764

Landscaping	1.5331	0.5841	50.6005	2.6700e-003		0.2789	0.2789		0.2789	0.2789		90.9140	90.9140	0.0881		93.1166
<b>Total</b>	<b>32.2271</b>	<b>11.6603</b>	<b>204.2749</b>	<b>0.5472</b>		<b>25.4468</b>	<b>25.4468</b>		<b>25.4468</b>	<b>25.4468</b>	<b>3,611.8027</b>	<b>11,106.9140</b>	<b>14,718.7167</b>	<b>17.1837</b>	<b>0.2020</b>	<b>15,208.4930</b>

**Mitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	1.0492					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	12.1176					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	17.5272	11.0762	153.6744	0.5445		25.1679	25.1679		25.1679	25.1679	3,611.8027	11,016.0000	14,627.8027	17.0956	0.2020	15,115.3764
Landscaping	1.5331	0.5841	50.6005	2.6700e-003		0.2789	0.2789		0.2789	0.2789		90.9140	90.9140	0.0881		93.1166
<b>Total</b>	<b>32.2271</b>	<b>11.6603</b>	<b>204.2749</b>	<b>0.5472</b>		<b>25.4468</b>	<b>25.4468</b>		<b>25.4468</b>	<b>25.4468</b>	<b>3,611.8027</b>	<b>11,106.9140</b>	<b>14,718.7167</b>	<b>17.1837</b>	<b>0.2020</b>	<b>15,208.4930</b>

**7.0 Water Detail**

**7.1 Mitigation Measures Water**

**8.0 Waste Detail**

**8.1 Mitigation Measures Waste**

**9.0 Operational Offroad**

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

### **Fire Pumps and Emergency Generators**

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

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
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### **User Defined Equipment**

Equipment Type	Number
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## **11.0 Vegetation**

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Sample Scenario - 462 Singlefamily Units Operation - Los Angeles-South Coast County, Winter

**Sample Scenario - 462 Singlefamily Units Operation  
Los Angeles-South Coast County, Winter**

**1.0 Project Characteristics**

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**1.1 Land Usage**

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Single Family Housing	462.00	Dwelling Unit	150.00	831,600.00	1321

**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>	11			<b>Operational Year</b>	2021
<b>Utility Company</b>	Los Angeles Department of Water & Power				
<b>CO2 Intensity (lb/MWhr)</b>	1227.89	<b>CH4 Intensity (lb/MWhr)</b>	0.029	<b>N2O Intensity (lb/MWhr)</b>	0.006

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

Woodstoves - SCAQMD Rule 445; new development may not have a wood-burning fireplace.

Table Name	Column Name	Default Value	New Value
tblFireplaces	NumberWood	23.10	0.00

**2.0 Emissions Summary**

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**2.2 Overall Operational  
Unmitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	32.2800	8.8024	154.2075	0.4130		19.2099	19.2099		19.2099	19.2099	2,726.5569	8,384.6312	11,111.1881	12.9720	0.1525	11,480.9211
Energy	0.3753	3.2074	1.3648	0.0205		0.2593	0.2593		0.2593	0.2593		4,094.5262	4,094.5262	0.0785	0.0751	4,118.8579
Mobile	8.6305	42.9253	115.6992	0.4000	33.2682	0.3481	33.6163	8.9035	0.3251	9.2285		40,690.6305	40,690.6305	2.2104		40,745.8901
<b>Total</b>	<b>41.2858</b>	<b>54.9351</b>	<b>271.2716</b>	<b>0.8335</b>	<b>33.2682</b>	<b>19.8173</b>	<b>53.0855</b>	<b>8.9035</b>	<b>19.7943</b>	<b>28.6977</b>	<b>2,726.5569</b>	<b>53,169.7879</b>	<b>55,896.3448</b>	<b>15.2609</b>	<b>0.2275</b>	<b>56,345.6692</b>

### Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	32.2800	8.8024	154.2075	0.4130		19.2099	19.2099		19.2099	19.2099	2,726.5569	8,384.6312	11,111.1881	12.9720	0.1525	11,480.9211
Energy	0.3753	3.2074	1.3648	0.0205		0.2593	0.2593		0.2593	0.2593		4,094.5262	4,094.5262	0.0785	0.0751	4,118.8579
Mobile	8.6305	42.9253	115.6992	0.4000	33.2682	0.3481	33.6163	8.9035	0.3251	9.2285		40,690.6305	40,690.6305	2.2104		40,745.8901
<b>Total</b>	<b>41.2858</b>	<b>54.9351</b>	<b>271.2716</b>	<b>0.8335</b>	<b>33.2682</b>	<b>19.8173</b>	<b>53.0855</b>	<b>8.9035</b>	<b>19.7943</b>	<b>28.6977</b>	<b>2,726.5569</b>	<b>53,169.7879</b>	<b>55,896.3448</b>	<b>15.2609</b>	<b>0.2275</b>	<b>56,345.6692</b>

	ROG	NOx	CO	SO2	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

## 4.0 Operational Detail - Mobile

### 4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	8.6305	42.9253	115.6992	0.4000	33.2682	0.3481	33.6163	8.9035	0.3251	9.2285		40,690.6305	40,690.6305	2.2104		40,745.8901
Unmitigated	8.6305	42.9253	115.6992	0.4000	33.2682	0.3481	33.6163	8.9035	0.3251	9.2285		40,690.6305	40,690.6305	2.2104		40,745.8901

#### 4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Single Family Housing	4,398.24	4,578.42	3,982.44	14,914,433	14,914,433
Total	4,398.24	4,578.42	3,982.44	14,914,433	14,914,433

#### 4.3 Trip Type Information

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
Single Family Housing	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3

#### 4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Single Family Housing	0.547192	0.045177	0.202743	0.121510	0.016147	0.006143	0.019743	0.029945	0.002479	0.002270	0.005078	0.000682	0.000891

#### 5.0 Energy Detail

Historical Energy Use: N

#### 5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.3753	3.2074	1.3648	0.0205		0.2593	0.2593		0.2593	0.2593		4,094.5262	4,094.5262	0.0785	0.0751	4,118.8579
NaturalGas Unmitigated	0.3753	3.2074	1.3648	0.0205		0.2593	0.2593		0.2593	0.2593		4,094.5262	4,094.5262	0.0785	0.0751	4,118.8579

## 5.2 Energy by Land Use - NaturalGas

### Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Single Family Housing	34803.5	0.3753	3.2074	1.3648	0.0205		0.2593	0.2593		0.2593	0.2593		4,094.5262	4,094.5262	0.0785	0.0751	4,118.8579
<b>Total</b>		<b>0.3753</b>	<b>3.2074</b>	<b>1.3648</b>	<b>0.0205</b>		<b>0.2593</b>	<b>0.2593</b>		<b>0.2593</b>	<b>0.2593</b>		<b>4,094.5262</b>	<b>4,094.5262</b>	<b>0.0785</b>	<b>0.0751</b>	<b>4,118.8579</b>

### Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Single Family Housing	34.8035	0.3753	3.2074	1.3648	0.0205		0.2593	0.2593		0.2593	0.2593		4,094.5262	4,094.5262	0.0785	0.0751	4,118.8579

Total		0.3753	3.2074	1.3648	0.0205		0.2593	0.2593		0.2593	0.2593		4,094.5262	4,094.5262	0.0785	0.0751	4,118.8579
														2			

## 6.0 Area Detail

### 6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	32.2800	8.8024	154.2075	0.4130		19.2099	19.2099		19.2099	19.2099	2,726.5569	8,384.6312	11,111.1881	12.9720	0.1525	11,480.9211
Unmitigated	32.2800	8.8024	154.2075	0.4130		19.2099	19.2099		19.2099	19.2099	2,726.5569	8,384.6312	11,111.1881	12.9720	0.1525	11,480.9211

### 6.2 Area by SubCategory

#### Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	1.4256					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	16.4657					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	13.2313	8.3615	116.0091	0.4110		18.9993	18.9993		18.9993	18.9993	2,726.5569	8,316.0000	11,042.5569	12.9055	0.1525	11,410.6273



Landscaping	1.1574	0.4409	38.1984	2.0100e-003		0.2106	0.2106		0.2106	0.2106		68.6312	68.6312	0.0665		70.2939	
<b>Total</b>	<b>32.2800</b>	<b>8.8024</b>	<b>154.2075</b>	<b>0.4130</b>		<b>19.2099</b>	<b>19.2099</b>		<b>19.2099</b>	<b>19.2099</b>		<b>2,726.5569</b>	<b>8,384.6312</b>	<b>11,111.1881</b>	<b>12.9720</b>	<b>0.1525</b>	<b>11,480.9212</b>

### Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	1.4256					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	16.4657					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	13.2313	8.3615	116.0091	0.4110		18.9993	18.9993		18.9993	18.9993	2,726.5569	8,316.0000	11,042.5569	12.9055	0.1525	11,410.6273
Landscaping	1.1574	0.4409	38.1984	2.0100e-003		0.2106	0.2106		0.2106	0.2106		68.6312	68.6312	0.0665		70.2939
<b>Total</b>	<b>32.2800</b>	<b>8.8024</b>	<b>154.2075</b>	<b>0.4130</b>		<b>19.2099</b>	<b>19.2099</b>		<b>19.2099</b>	<b>19.2099</b>	<b>2,726.5569</b>	<b>8,384.6312</b>	<b>11,111.1881</b>	<b>12.9720</b>	<b>0.1525</b>	<b>11,480.9212</b>

## 7.0 Water Detail

### 7.1 Mitigation Measures Water

## 8.0 Waste Detail

### 8.1 Mitigation Measures Waste

## 9.0 Operational Offroad

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

### **Fire Pumps and Emergency Generators**

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

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
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### **User Defined Equipment**

Equipment Type	Number
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## **11.0 Vegetation**

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LA Housing Element - Growth Inducement (220,000 units) - Los Angeles-South Coast County, Summer

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

**LA Housing Element - Growth Inducement (220,000 units)**

Los Angeles-South Coast County, Summer

**1.0 Project Characteristics**

**1.1 Land Usage**

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Apartments Low Rise	179,740.00	Dwelling Unit	1,000.00	179,740,000.00	514056
Single Family Housing	40,260.00	Dwelling Unit	1,000.00	72,468,000.00	115144

**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>	11			<b>Operational Year</b>	2029
<b>Utility Company</b>	Southern California Edison				
<b>CO2 Intensity (lb/MWhr)</b>	377.41	<b>CH4 Intensity (lb/MWhr)</b>	0.016	<b>N2O Intensity (lb/MWhr)</b>	0.003

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

Project Characteristics - Adjusted to reflect comply with RPS requirements.

Vehicle Trips - Traffic Data

Woodstoves - SCAQMD Rule 445; new development may not have a wood-burning fireplace.

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	10,000.00	10.00
tblConstructionPhase	NumDays	6,000.00	10.00
tblConstructionPhase	NumDays	15,500.00	10.00
tblConstructionPhase	NumDays	155,000.00	10.00
tblConstructionPhase	NumDays	11,000.00	10.00
tblConstructionPhase	NumDays	11,000.00	10.00
tblFireplaces	NumberWood	8,987.00	0.00

LA Housing Element - Growth Inducement (220,000 units) - Los Angeles-South Coast County, Summer

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

tblFireplaces	NumberWood	2,013.00	0.00
tblGrading	AcresOfGrading	30.00	46,500.00
tblGrading	AcresOfGrading	15.00	9,000.00
tblLandUse	LotAcreage	11,233.75	1,000.00
tblLandUse	LotAcreage	13,071.43	1,000.00
tblProjectCharacteristics	CH4IntensityFactor	0.033	0.016
tblProjectCharacteristics	CO2IntensityFactor	390.98	377.41
tblProjectCharacteristics	N2OIntensityFactor	0.004	0.003
tblVehicleTrips	DV_TP	11.00	0.00
tblVehicleTrips	HO_TL	8.70	7.96
tblVehicleTrips	HS_TL	5.90	7.96
tblVehicleTrips	HW_TL	14.70	7.96
tblVehicleTrips	PB_TP	3.00	0.00
tblVehicleTrips	PR_TP	86.00	100.00
tblVehicleTrips	ST_TR	8.14	0.00
tblVehicleTrips	ST_TR	9.54	-1.69
tblVehicleTrips	SU_TR	6.28	0.00
tblVehicleTrips	SU_TR	8.55	-1.69
tblVehicleTrips	WD_TR	7.32	0.00
tblVehicleTrips	WD_TR	9.44	-1.69

**2.0 Emissions Summary**

**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
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LA Housing Element - Growth Inducement (220,000 units) - Los Angeles-South Coast County, Summer

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

Category	lb/day										lb/day					
Area	12,271.144 5	4,190.5195	73,375.5041	196.6880		9,147.8951	9,147.8951		9,147.8951	9,147.8951	1,298,360.4 480	3,992,681.5 060	5,291,041.9 540	6,176.7676	72.6000	5,467,095.9 430
Energy	102.8205	878.6481	373.8928	5.6084		71.0396	71.0396		71.0396	71.0396		1,121,678.4 433	1,121,678.4 433	21.4988	20.5641	1,128,344.0 175
Mobile	-165.9881	-148.6131	-1,568.6551	-3.4819	-415.1845	-2.2975	-417.4820	-110.6143	-2.1353	-112.7496		-	-	-24.2200	-14.6247	-
												373,523.43	373,523.43			378,487.10
<b>Total</b>	<b>12,207.976 8</b>	<b>4,920.5545</b>	<b>72,180.7418</b>	<b>198.8145</b>	<b>-415.1845</b>	<b>9,216.6372</b>	<b>8,801.4527</b>	<b>-110.6143</b>	<b>9,216.7994</b>	<b>9,106.1851</b>	<b>1,298,360.4 480</b>	<b>4,740,836.5 157</b>	<b>6,039,196.9 637</b>	<b>6,174.0465</b>	<b>78.5394</b>	<b>6,216,952.8 541</b>

**Mitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	12,271.144 5	4,190.5195	73,375.5041	196.6880		9,147.8951	9,147.8951		9,147.8951	9,147.8951	1,298,360.4 480	3,992,681.5 060	5,291,041.9 540	6,176.7676	72.6000	5,467,095.9 430
Energy	102.8205	878.6481	373.8928	5.6084		71.0396	71.0396		71.0396	71.0396		1,121,678.4 433	1,121,678.4 433	21.4988	20.5641	1,128,344.0 175
Mobile	-165.9881	-148.6131	-1,568.6551	-3.4819	-415.1845	-2.2975	-417.4820	-110.6143	-2.1353	-112.7496		-	-	-24.2200	-14.6247	-
												373,523.43	373,523.43			378,487.10
<b>Total</b>	<b>12,207.976 8</b>	<b>4,920.5545</b>	<b>72,180.7418</b>	<b>198.8145</b>	<b>-415.1845</b>	<b>9,216.6372</b>	<b>8,801.4527</b>	<b>-110.6143</b>	<b>9,216.7994</b>	<b>9,106.1851</b>	<b>1,298,360.4 480</b>	<b>4,740,836.5 157</b>	<b>6,039,196.9 637</b>	<b>6,174.0465</b>	<b>78.5394</b>	<b>6,216,952.8 541</b>

	ROG	NOx	CO	SO2	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

**4.0 Operational Detail - Mobile**

**4.1 Mitigation Measures Mobile**

LA Housing Element - Growth Inducement (220,000 units) - Los Angeles-South Coast County, Summer

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
	lb/day										lb/day					
Mitigated	-165.9881	-148.6131	-1,568.6551	-3.4819	-415.1845	-2.2975	-417.4820	-110.6143	-2.1353	-112.7496	-	-	-	-24.2200	-14.6247	-
Unmitigated	-165.9881	-148.6131	-1,568.6551	-3.4819	-415.1845	-2.2975	-417.4820	-110.6143	-2.1353	-112.7496	-	-	-	-24.2200	-14.6247	-

**4.2 Trip Summary Information**

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Apartments Low Rise	0.00	0.00	0.00		
Single Family Housing	-68,039.40	-68,039.40	-68,039.40	-197,140,079	-197,140,079
<b>Total</b>	<b>-68,039.40</b>	<b>-68,039.40</b>	<b>-68,039.40</b>	<b>-197,140,079</b>	<b>-197,140,079</b>

**4.3 Trip Type Information**

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
Single Family Housing	7.96	7.96	7.96	40.20	19.20	40.60	100	0	0

**4.4 Fleet Mix**

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Low Rise	0.531474	0.067154	0.192702	0.126421	0.024086	0.006875	0.011564	0.007937	0.000940	0.000574	0.026268	0.000718	0.003288
Single Family Housing	0.531474	0.067154	0.192702	0.126421	0.024086	0.006875	0.011564	0.007937	0.000940	0.000574	0.026268	0.000718	0.003288

**5.0 Energy Detail**

Historical Energy Use: N

**5.1 Mitigation Measures Energy**

LA Housing Element - Growth Inducement (220,000 units) - Los Angeles-South Coast County, Summer

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	102.8205	878.6481	373.8928	5.6084		71.0396	71.0396		71.0396	71.0396		1,121,678.4433	1,121,678.4433	21.4988	20.5641	1,128,344.0175
NaturalGas Unmitigated	102.8205	878.6481	373.8928	5.6084		71.0396	71.0396		71.0396	71.0396		1,121,678.4433	1,121,678.4433	21.4988	20.5641	1,128,344.0175

**5.2 Energy by Land Use - NaturalGas**

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Apartments Low Rise	6.73639e+006	72.6474	620.8050	264.1723	3.9626		50.1927	50.1927		50.1927	50.1927		792,516.9656	792,516.9656	15.1899	14.5295	797,226.4977
Single Family Housing	2.79787e+006	30.1731	257.8432	109.7205	1.6458		20.8469	20.8469		20.8469	20.8469		329,161.4777	329,161.4777	6.3089	6.0346	331,117.5198
<b>Total</b>		<b>102.8205</b>	<b>878.6481</b>	<b>373.8928</b>	<b>5.6084</b>		<b>71.0396</b>	<b>71.0396</b>		<b>71.0396</b>	<b>71.0396</b>		<b>1,121,678.4433</b>	<b>1,121,678.4433</b>	<b>21.4988</b>	<b>20.5641</b>	<b>1,128,344.0175</b>

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
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LA Housing Element - Growth Inducement (220,000 units) - Los Angeles-South Coast County, Summer

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

Land Use	kBTU/yr	lb/day										lb/day					
Apartments Low Rise	6736.39	72.6474	620.8050	264.1723	3.9626		50.1927	50.1927		50.1927	50.1927		792,516.9656	792,516.9656	15.1899	14.5295	797,226.4977
Single Family Housing	2797.87	30.1731	257.8432	109.7205	1.6458		20.8469	20.8469		20.8469	20.8469		329,161.4777	329,161.4777	6.3089	6.0346	331,117.5198
<b>Total</b>		<b>102.8205</b>	<b>878.6481</b>	<b>373.8928</b>	<b>5.6084</b>		<b>71.0396</b>	<b>71.0396</b>		<b>71.0396</b>	<b>71.0396</b>		<b>1,121,678.4433</b>	<b>1,121,678.4433</b>	<b>21.4988</b>	<b>20.5641</b>	<b>1,128,344.0175</b>

**6.0 Area Detail**

**6.1 Mitigation Measures Area**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	12,271.1445	4,190.5195	73,375.5041	196.6880		9,147.8951	9,147.8951		9,147.8951	9,147.8951	1,298,360.480	3,992,681.5060	5,291,041.9540	6,176.7676	72.6000	5,467,095.9430
Unmitigated	12,271.1445	4,190.5195	73,375.5041	196.6880		9,147.8951	9,147.8951		9,147.8951	9,147.8951	1,298,360.480	3,992,681.5060	5,291,041.9540	6,176.7676	72.6000	5,467,095.9430

**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
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LA Housing Element - Growth Inducement (220,000 units) - Los Angeles-South Coast County, Summer

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

SubCategory	lb/day								lb/day							
Architectural Coating	432.3640					0.0000	0.0000		0.0000	0.0000			0.0000		0.0000	
Consumer Products	4,993.7184					0.0000	0.0000		0.0000	0.0000			0.0000		0.0000	
Hearth	6,300.6240	3,981.6480	55,242.4224	195.7296		9,047.2800	9,047.2800		9,047.2800	9,047.2800	1,298,360.480	3,960,000.000	5,258,360.480	6,145.4712	72.6000	5,433,632.0280
Landscaping	544.4381	208.8715	18,133.0817	0.9584		100.6151	100.6151		100.6151	100.6151		32,681.5060	32,681.5060	31.2964		33,463.9150
<b>Total</b>	<b>12,271.1445</b>	<b>4,190.5195</b>	<b>73,375.5041</b>	<b>196.6880</b>		<b>9,147.8951</b>	<b>9,147.8951</b>		<b>9,147.8951</b>	<b>9,147.8951</b>	<b>1,298,360.480</b>	<b>3,992,681.5060</b>	<b>5,291,041.9540</b>	<b>6,176.7676</b>	<b>72.6000</b>	<b>5,467,095.9430</b>

**Mitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	432.3640					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	4,993.7184					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	6,300.6240	3,981.6480	55,242.4224	195.7296		9,047.2800	9,047.2800		9,047.2800	9,047.2800	1,298,360.480	3,960,000.000	5,258,360.480	6,145.4712	72.6000	5,433,632.0280
Landscaping	544.4381	208.8715	18,133.0817	0.9584		100.6151	100.6151		100.6151	100.6151		32,681.5060	32,681.5060	31.2964		33,463.9150
<b>Total</b>	<b>12,271.1445</b>	<b>4,190.5195</b>	<b>73,375.5041</b>	<b>196.6880</b>		<b>9,147.8951</b>	<b>9,147.8951</b>		<b>9,147.8951</b>	<b>9,147.8951</b>	<b>1,298,360.480</b>	<b>3,992,681.5060</b>	<b>5,291,041.9540</b>	<b>6,176.7676</b>	<b>72.6000</b>	<b>5,467,095.9430</b>

**7.0 Water Detail**

**7.1 Mitigation Measures Water**

LA Housing Element - Growth Inducement (220,000 units) - Los Angeles-South Coast County, Summer

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

**8.0 Waste Detail**

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**8.1 Mitigation Measures Waste**

**9.0 Operational Offroad**

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

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**Fire Pumps and Emergency Generators**

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

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
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**User Defined Equipment**

Equipment Type	Number
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**11.0 Vegetation**

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LA Housing Element - Growth Inducement (220,000 units) - Los Angeles-South Coast County, Winter

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

**LA Housing Element - Growth Inducement (220,000 units)**

**Los Angeles-South Coast County, Winter**

**1.0 Project Characteristics**

**1.1 Land Usage**

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Apartments Low Rise	179,740.00	Dwelling Unit	1,000.00	179,740,000.00	514056
Single Family Housing	40,260.00	Dwelling Unit	1,000.00	72,468,000.00	115144

**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>	11			<b>Operational Year</b>	2029
<b>Utility Company</b>	Southern California Edison				
<b>CO2 Intensity (lb/MWhr)</b>	377.41	<b>CH4 Intensity (lb/MWhr)</b>	0.016	<b>N2O Intensity (lb/MWhr)</b>	0.003

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

Project Characteristics - Adjusted to reflect comply with RPS requirements.

Vehicle Trips - Traffic Data

Woodstoves - SCAQMD Rule 445; new development may not have a wood-burning fireplace.

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	10,000.00	10.00
tblConstructionPhase	NumDays	6,000.00	10.00
tblConstructionPhase	NumDays	15,500.00	10.00
tblConstructionPhase	NumDays	155,000.00	10.00
tblConstructionPhase	NumDays	11,000.00	10.00
tblConstructionPhase	NumDays	11,000.00	10.00
tblFireplaces	NumberWood	8,987.00	0.00

LA Housing Element - Growth Inducement (220,000 units) - Los Angeles-South Coast County, Winter

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

tblFireplaces	NumberWood	2,013.00	0.00
tblGrading	AcresOfGrading	30.00	46,500.00
tblGrading	AcresOfGrading	15.00	9,000.00
tblLandUse	LotAcreage	11,233.75	1,000.00
tblLandUse	LotAcreage	13,071.43	1,000.00
tblProjectCharacteristics	CH4IntensityFactor	0.033	0.016
tblProjectCharacteristics	CO2IntensityFactor	390.98	377.41
tblProjectCharacteristics	N2OIntensityFactor	0.004	0.003
tblVehicleTrips	DV_TP	11.00	0.00
tblVehicleTrips	HO_TL	8.70	7.96
tblVehicleTrips	HS_TL	5.90	7.96
tblVehicleTrips	HW_TL	14.70	7.96
tblVehicleTrips	PB_TP	3.00	0.00
tblVehicleTrips	PR_TP	86.00	100.00
tblVehicleTrips	ST_TR	8.14	0.00
tblVehicleTrips	ST_TR	9.54	-1.69
tblVehicleTrips	SU_TR	6.28	0.00
tblVehicleTrips	SU_TR	8.55	-1.69
tblVehicleTrips	WD_TR	7.32	0.00
tblVehicleTrips	WD_TR	9.44	-1.69

**2.0 Emissions Summary**

**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
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LA Housing Element - Growth Inducement (220,000 units) - Los Angeles-South Coast County, Winter

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

Category	lb/day										lb/day					
Area	12,271.144 5	4,190.5195	73,375.5041	196.6880		9,147.8951	9,147.8951		9,147.8951	9,147.8951	1,298,360.4 480	3,992,681.5 060	5,291,041.9 540	6,176.7676	72.6000	5,467,095.9 430
Energy	102.8205	878.6481	373.8928	5.6084		71.0396	71.0396		71.0396	71.0396		1,121,678.4 433	1,121,678.4 433	21.4988	20.5641	1,128,344.0 175
Mobile	-162.4542	-160.2643	-1,553.6206	-3.3381	-415.1845	-2.2986	-417.4830	-110.6143	-2.1363	-112.7505		-	-	-24.9206	-15.2359	-
												358,033.54 05	358,033.54 05			363,196.86 01
<b>Total</b>	<b>12,211.510 8</b>	<b>4,908.9034</b>	<b>72,195.7764</b>	<b>198.9583</b>	<b>-415.1845</b>	<b>9,216.6362</b>	<b>8,801.4517</b>	<b>-110.6143</b>	<b>9,216.7984</b>	<b>9,106.1842</b>	<b>1,298,360.4 480</b>	<b>4,756,326.4 068</b>	<b>6,054,686.8 548</b>	<b>6,173.3458</b>	<b>77.9282</b>	<b>6,232,243.0 944</b>

**Mitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	12,271.144 5	4,190.5195	73,375.5041	196.6880		9,147.8951	9,147.8951		9,147.8951	9,147.8951	1,298,360.4 480	3,992,681.5 060	5,291,041.9 540	6,176.7676	72.6000	5,467,095.9 430
Energy	102.8205	878.6481	373.8928	5.6084		71.0396	71.0396		71.0396	71.0396		1,121,678.4 433	1,121,678.4 433	21.4988	20.5641	1,128,344.0 175
Mobile	-162.4542	-160.2643	-1,553.6206	-3.3381	-415.1845	-2.2986	-417.4830	-110.6143	-2.1363	-112.7505		-	-	-24.9206	-15.2359	-
												358,033.54 05	358,033.54 05			363,196.86 01
<b>Total</b>	<b>12,211.510 8</b>	<b>4,908.9034</b>	<b>72,195.7764</b>	<b>198.9583</b>	<b>-415.1845</b>	<b>9,216.6362</b>	<b>8,801.4517</b>	<b>-110.6143</b>	<b>9,216.7984</b>	<b>9,106.1842</b>	<b>1,298,360.4 480</b>	<b>4,756,326.4 068</b>	<b>6,054,686.8 548</b>	<b>6,173.3458</b>	<b>77.9282</b>	<b>6,232,243.0 944</b>

	ROG	NOx	CO	SO2	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

**4.0 Operational Detail - Mobile**

**4.1 Mitigation Measures Mobile**

LA Housing Element - Growth Inducement (220,000 units) - Los Angeles-South Coast County, Winter

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
lb/day											lb/day					
Mitigated	-162.4542	-160.2643	-1,553.6206	-3.3381	-415.1845	-2.2986	-417.4830	-110.6143	-2.1363	-112.7505	-	-	-24.9206	-15.2359	-	-
Unmitigated	-162.4542	-160.2643	-1,553.6206	-3.3381	-415.1845	-2.2986	-417.4830	-110.6143	-2.1363	-112.7505	-	-	-24.9206	-15.2359	-	-

**4.2 Trip Summary Information**

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Apartments Low Rise	0.00	0.00	0.00		
Single Family Housing	-68,039.40	-68,039.40	-68,039.40	-197,140,079	-197,140,079
<b>Total</b>	<b>-68,039.40</b>	<b>-68,039.40</b>	<b>-68,039.40</b>	<b>-197,140,079</b>	<b>-197,140,079</b>

**4.3 Trip Type Information**

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
Single Family Housing	7.96	7.96	7.96	40.20	19.20	40.60	100	0	0

**4.4 Fleet Mix**

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Low Rise	0.531474	0.067154	0.192702	0.126421	0.024086	0.006875	0.011564	0.007937	0.000940	0.000574	0.026268	0.000718	0.003288
Single Family Housing	0.531474	0.067154	0.192702	0.126421	0.024086	0.006875	0.011564	0.007937	0.000940	0.000574	0.026268	0.000718	0.003288

**5.0 Energy Detail**

Historical Energy Use: N

**5.1 Mitigation Measures Energy**

LA Housing Element - Growth Inducement (220,000 units) - Los Angeles-South Coast County, Winter

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	102.8205	878.6481	373.8928	5.6084		71.0396	71.0396		71.0396	71.0396		1,121,678.4433	1,121,678.4433	21.4988	20.5641	1,128,344.0175
NaturalGas Unmitigated	102.8205	878.6481	373.8928	5.6084		71.0396	71.0396		71.0396	71.0396		1,121,678.4433	1,121,678.4433	21.4988	20.5641	1,128,344.0175

**5.2 Energy by Land Use - NaturalGas**

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Apartments Low Rise	6.73639e+006	72.6474	620.8050	264.1723	3.9626		50.1927	50.1927		50.1927	50.1927		792,516.9656	792,516.9656	15.1899	14.5295	797,226.4977
Single Family Housing	2.79787e+006	30.1731	257.8432	109.7205	1.6458		20.8469	20.8469		20.8469	20.8469		329,161.4777	329,161.4777	6.3089	6.0346	331,117.5198
<b>Total</b>		<b>102.8205</b>	<b>878.6481</b>	<b>373.8928</b>	<b>5.6084</b>		<b>71.0396</b>	<b>71.0396</b>		<b>71.0396</b>	<b>71.0396</b>		<b>1,121,678.4433</b>	<b>1,121,678.4433</b>	<b>21.4988</b>	<b>20.5641</b>	<b>1,128,344.0175</b>

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
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LA Housing Element - Growth Inducement (220,000 units) - Los Angeles-South Coast County, Winter

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

Land Use	kBTU/yr	lb/day										lb/day					
Apartments Low Rise	6736.39	72.6474	620.8050	264.1723	3.9626		50.1927	50.1927		50.1927	50.1927		792,516.9656	792,516.9656	15.1899	14.5295	797,226.4977
Single Family Housing	2797.87	30.1731	257.8432	109.7205	1.6458		20.8469	20.8469		20.8469	20.8469		329,161.4777	329,161.4777	6.3089	6.0346	331,117.5198
<b>Total</b>		<b>102.8205</b>	<b>878.6481</b>	<b>373.8928</b>	<b>5.6084</b>		<b>71.0396</b>	<b>71.0396</b>		<b>71.0396</b>	<b>71.0396</b>		<b>1,121,678.4433</b>	<b>1,121,678.4433</b>	<b>21.4988</b>	<b>20.5641</b>	<b>1,128,344.0175</b>

**6.0 Area Detail**

**6.1 Mitigation Measures Area**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	12,271.1445	4,190.5195	73,375.5041	196.6880		9,147.8951	9,147.8951		9,147.8951	9,147.8951	1,298,360.480	3,992,681.5060	5,291,041.9540	6,176.7676	72.6000	5,467,095.9430
Unmitigated	12,271.1445	4,190.5195	73,375.5041	196.6880		9,147.8951	9,147.8951		9,147.8951	9,147.8951	1,298,360.480	3,992,681.5060	5,291,041.9540	6,176.7676	72.6000	5,467,095.9430

**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
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LA Housing Element - Growth Inducement (220,000 units) - Los Angeles-South Coast County, Winter

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

SubCategory	lb/day								lb/day							
Architectural Coating	432.3640					0.0000	0.0000		0.0000	0.0000			0.0000		0.0000	
Consumer Products	4,993.7184					0.0000	0.0000		0.0000	0.0000			0.0000		0.0000	
Hearth	6,300.6240	3,981.6480	55,242.4224	195.7296		9,047.2800	9,047.2800		9,047.2800	9,047.2800	1,298,360.480	3,960,000.000	5,258,360.480	6,145.4712	72.6000	5,433,632.0280
Landscaping	544.4381	208.8715	18,133.0817	0.9584		100.6151	100.6151		100.6151	100.6151		32,681.5060	32,681.5060	31.2964		33,463.9150
<b>Total</b>	<b>12,271.1445</b>	<b>4,190.5195</b>	<b>73,375.5041</b>	<b>196.6880</b>		<b>9,147.8951</b>	<b>9,147.8951</b>		<b>9,147.8951</b>	<b>9,147.8951</b>	<b>1,298,360.480</b>	<b>3,992,681.5060</b>	<b>5,291,041.9540</b>	<b>6,176.7676</b>	<b>72.6000</b>	<b>5,467,095.9430</b>

**Mitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	432.3640					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	4,993.7184					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	6,300.6240	3,981.6480	55,242.4224	195.7296		9,047.2800	9,047.2800		9,047.2800	9,047.2800	1,298,360.480	3,960,000.000	5,258,360.480	6,145.4712	72.6000	5,433,632.0280
Landscaping	544.4381	208.8715	18,133.0817	0.9584		100.6151	100.6151		100.6151	100.6151		32,681.5060	32,681.5060	31.2964		33,463.9150
<b>Total</b>	<b>12,271.1445</b>	<b>4,190.5195</b>	<b>73,375.5041</b>	<b>196.6880</b>		<b>9,147.8951</b>	<b>9,147.8951</b>		<b>9,147.8951</b>	<b>9,147.8951</b>	<b>1,298,360.480</b>	<b>3,992,681.5060</b>	<b>5,291,041.9540</b>	<b>6,176.7676</b>	<b>72.6000</b>	<b>5,467,095.9430</b>

**7.0 Water Detail**

**7.1 Mitigation Measures Water**

LA Housing Element - Growth Inducement (220,000 units) - Los Angeles-South Coast County, Winter

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

**8.0 Waste Detail**

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**8.1 Mitigation Measures Waste**

**9.0 Operational Offroad**

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

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**Fire Pumps and Emergency Generators**

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

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
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**User Defined Equipment**

Equipment Type	Number
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**11.0 Vegetation**

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LA Housing Element - Los Angeles-South Coast County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

**LA Housing Element**  
Los Angeles-South Coast County, Annual

**1.0 Project Characteristics**

**1.1 Land Usage**

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Apartments Low Rise	343,407.00	Dwelling Unit	1,000.00	343,407,000.00	982144
Single Family Housing	76,920.00	Dwelling Unit	1,000.00	138,456,000.00	219991

**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>	11			<b>Operational Year</b>	2029
<b>Utility Company</b>	Southern California Edison				
<b>CO2 Intensity (lb/MWhr)</b>	377.41	<b>CH4 Intensity (lb/MWhr)</b>	0.016	<b>N2O Intensity (lb/MWhr)</b>	0.003

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

Project Characteristics - Adjusted to reflect comply with RPS requirements.

Construction Phase - Buildout would would not take 759 years to complete.

Vehicle Trips - Traffic Data

Woodstoves - SCAQMD Rule 445; new development may not have a wood-burning fireplace.

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	10,000.00	10.00
tblConstructionPhase	NumDays	6,000.00	10.00
tblConstructionPhase	NumDays	15,500.00	10.00
tblConstructionPhase	NumDays	155,000.00	10.00
tblConstructionPhase	NumDays	11,000.00	10.00
tblConstructionPhase	NumDays	11,000.00	10.00

LA Housing Element - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

tblFireplaces	NumberWood	17,170.35	0.00
tblFireplaces	NumberWood	3,846.00	0.00
tblGrading	AcresOfGrading	30.00	46,500.00
tblGrading	AcresOfGrading	15.00	9,000.00
tblLandUse	LotAcreage	21,462.94	1,000.00
tblLandUse	LotAcreage	24,974.03	1,000.00
tblProjectCharacteristics	CH4IntensityFactor	0.033	0.016
tblProjectCharacteristics	CO2IntensityFactor	390.98	377.41
tblProjectCharacteristics	N2OIntensityFactor	0.004	0.003
tblVehicleTrips	DV_TP	11.00	0.00
tblVehicleTrips	HO_TL	8.70	7.96
tblVehicleTrips	HS_TL	5.90	7.96
tblVehicleTrips	HW_TL	14.70	7.96
tblVehicleTrips	PB_TP	3.00	0.00
tblVehicleTrips	PR_TP	86.00	100.00
tblVehicleTrips	ST_TR	8.14	0.00
tblVehicleTrips	ST_TR	9.54	-1.69
tblVehicleTrips	SU_TR	6.28	0.00
tblVehicleTrips	SU_TR	8.55	-1.69
tblVehicleTrips	WD_TR	7.32	0.00
tblVehicleTrips	WD_TR	9.44	-1.69

**2.0 Emissions Summary**

**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
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LA Housing Element - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

Category	tons/yr										MT/yr					
Area	2,172.4656	144.9737	5,649.8932	4.9034		240.0982	240.0982		240.0982	240.0982	28,129.7345	92,876.3425	121,006.0770	139.9258	1.5729	124,972.9512
Energy	35.8515	306.3674	130.3691	1.9555		24.7701	24.7701		24.7701	24.7701	0.0000	693,486.6971	693,486.6971	21.1585	9.1969	696,756.3448
Mobile	-55.5389	-56.3979	-543.4609	-1.1727	-141.5564	-0.7981	-142.3545	-37.7727	-0.7418	-38.5145	0.0000	-	-	-7.8191	-4.8296	-
Waste						0.0000	0.0000		0.0000	0.0000	50,374.9539	0.0000	50,374.9539	2,977.0745	0.0000	124,801.8161
Water						0.0000	0.0000		0.0000	0.0000	8,688.3131	93,882.1528	102,570.4659	896.3531	21.8171	131,480.7970
<b>Total</b>	<b>2,152.7782</b>	<b>394.9432</b>	<b>5,236.8014</b>	<b>5.6862</b>	<b>-141.5564</b>	<b>264.0702</b>	<b>122.5138</b>	<b>-37.7727</b>	<b>264.1266</b>	<b>226.3538</b>	<b>87,193.0016</b>	<b>766,130.0149</b>	<b>853,323.0165</b>	<b>4,026.6928</b>	<b>27.7574</b>	<b>962,262.0313</b>

**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	2,172.4656	144.9737	5,649.8932	4.9034		240.0982	240.0982		240.0982	240.0982	28,129.7345	92,876.3425	121,006.0770	139.9258	1.5729	124,972.9512
Energy	35.8515	306.3674	130.3691	1.9555		24.7701	24.7701		24.7701	24.7701	0.0000	693,486.6971	693,486.6971	21.1585	9.1969	696,756.3448
Mobile	-55.5389	-56.3979	-543.4609	-1.1727	-141.5564	-0.7981	-142.3545	-37.7727	-0.7418	-38.5145	0.0000	-	-	-7.8191	-4.8296	-
Waste						0.0000	0.0000		0.0000	0.0000	50,374.9539	0.0000	50,374.9539	2,977.0745	0.0000	124,801.8161
Water						0.0000	0.0000		0.0000	0.0000	8,688.3131	93,882.1528	102,570.4659	896.3531	21.8171	131,480.7970
<b>Total</b>	<b>2,152.7782</b>	<b>394.9432</b>	<b>5,236.8014</b>	<b>5.6862</b>	<b>-141.5564</b>	<b>264.0702</b>	<b>122.5138</b>	<b>-37.7727</b>	<b>264.1266</b>	<b>226.3538</b>	<b>87,193.0016</b>	<b>766,130.0149</b>	<b>853,323.0165</b>	<b>4,026.6928</b>	<b>27.7574</b>	<b>962,262.0313</b>

LA Housing Element - Los Angeles-South Coast County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

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

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive 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	-55.5389	-56.3979	-543.4609	-1.1727	-141.5564	-0.7981	-142.3545	-37.7727	-0.7418	-38.5145	0.0000	-	-	-7.8191	-4.8296	-
Unmitigated	-55.5389	-56.3979	-543.4609	-1.1727	-141.5564	-0.7981	-142.3545	-37.7727	-0.7418	-38.5145	0.0000	114,115.17	114,115.17	-7.8191	-4.8296	-

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated Annual VMT	Mitigated Annual VMT
	Weekday	Saturday	Sunday		
Apartments Low Rise	0.00	0.00	0.00		
Single Family Housing	-129,994.80	-129,994.80	-129,994.80	-376,652,133	-376,652,133
Total	-129,994.80	-129,994.80	-129,994.80	-376,652,133	-376,652,133

4.3 Trip Type Information

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
Single Family Housing	7.96	7.96	7.96	40.20	19.20	40.60	100	0	0

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Low Rise	0.531474	0.067154	0.192702	0.126421	0.024086	0.006875	0.011564	0.007937	0.000940	0.000574	0.026268	0.000718	0.003288

LA Housing Element - Los Angeles-South Coast County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Single Family Housing	0.531474	0.067154	0.192702	0.126421	0.024086	0.006875	0.011564	0.007937	0.000940	0.000574	0.026268	0.000718	0.003288
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5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	338,680.0829	338,680.0829	14.3581	2.6921	339,841.2922
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	338,680.0829	338,680.0829	14.3581	2.6921	339,841.2922
NaturalGas Mitigated	35.8515	306.3674	130.3691	1.9555		24.7701	24.7701		24.7701	24.7701	0.0000	354,806.6142	354,806.6142	6.8005	6.5048	356,915.0525
NaturalGas Unmitigated	35.8515	306.3674	130.3691	1.9555		24.7701	24.7701		24.7701	24.7701	0.0000	354,806.6142	354,806.6142	6.8005	6.5048	356,915.0525

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Apartments Low Rise	4.69769e+009	25.3307	216.4624	92.1117	1.3817		17.5012	17.5012		17.5012	17.5012	0.0000	250,686.8650	250,686.8650	4.8048	4.5959	252,176.5717

LA Housing Element - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

Single Family Housing	1.95113e+009	10.5208	89.9050	38.2575	0.5739		7.2689	7.2689		7.2689	7.2689	0.0000	104,119.7492	104,119.7492	1.9956	1.9089	104,738.4808
<b>Total</b>		<b>35.8515</b>	<b>306.3674</b>	<b>130.3691</b>	<b>1.9555</b>		<b>24.7701</b>	<b>24.7701</b>		<b>24.7701</b>	<b>24.7701</b>	<b>0.0000</b>	<b>354,806.6142</b>	<b>354,806.6142</b>	<b>6.8005</b>	<b>6.5048</b>	<b>356,915.05</b>

**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	4.70E+09	25.3307	216.4624	92.1117	1.3817		17.5012	17.5012		17.5012	17.5012	0.0000	250,686.8650	250,686.8650	4.8048	4.5959	252,176.5717
Single Family Housing	1.95E+09	10.5208	89.9050	38.2575	0.5739		7.2689	7.2689		7.2689	7.2689	0.0000	104,119.7492	104,119.7492	1.9956	1.9089	104,738.4808
<b>Total</b>		<b>35.8515</b>	<b>306.3674</b>	<b>130.3691</b>	<b>1.9555</b>		<b>24.7701</b>	<b>24.7701</b>		<b>24.7701</b>	<b>24.7701</b>	<b>0.0000</b>	<b>354,806.6142</b>	<b>354,806.6142</b>	<b>6.8005</b>	<b>6.5048</b>	<b>356,915.0525</b>

**5.3 Energy by Land Use - Electricity**

**Unmitigated**

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Apartments Low Rise	1.37771e+009	235,850.1852	9.9987	1.8748	236,658.8287
Single Family Housing	6.00676e+008	102,829.8977	4.3594	0.8174	103,182.4635



LA Housing Element - Los Angeles-South Coast County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Total		338,680.08 29	14.3581	2.6921	339,841.292 2
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**Mitigated**

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Apartments Low Rise	1.37771e+009	235,850.18 52	9.9987	1.8748	236,658.828 7
Single Family Housing	6.01E+08	102,829.89 77	4.3594	0.8174	103,182.463 5
<b>Total</b>		<b>338,680.08 29</b>	<b>14.3581</b>	<b>2.6921</b>	<b>339,841.292 2</b>

**6.0 Area Detail**

**6.1 Mitigation Measures Area**

	ROG	NOx	CO	SO2	Fugitive 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	2,172.4656	144.9737	5,649.8932	4.9034		240.0982	240.0982		240.0982	240.0982	28,129.7345	92,876.342 5	121,006.07 70	139.9258	1.5729	124,972.95



LA Housing Element - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

Hearth	150.4729	95.0906	1,319.3115	4.6745		216.0691	216.0691		216.0691	216.0691	28,129.7345	85,795.704	113,925.43	133.1452	1.5729	117,722.79
												1	86			93
Landscaping	130.0239	49.8832	4,330.5817	0.2289		24.0291	24.0291		24.0291	24.0291	0.0000	7,080.6384	7,080.6384	6.7805	0.0000	7,250.1519
<b>Total</b>	<b>2,172.4656</b>	<b>144.9737</b>	<b>5,649.8932</b>	<b>4.9034</b>		<b>240.0982</b>	<b>240.0982</b>		<b>240.0982</b>	<b>240.0982</b>	<b>28,129.7345</b>	<b>92,876.342</b>	<b>121,006.07</b>	<b>139.9258</b>	<b>1.5729</b>	<b>124,972.95</b>
												5	70			12

**7.0 Water Detail**

**7.1 Mitigation Measures Water**

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	102,570.4659	896.3531	21.8171	131,480.7970
Unmitigated	102,570.4659	896.3531	21.8171	131,480.80

**7.2 Water by Land Use**

**Unmitigated**

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Apartments Low Rise	22374.3 / 14105.6	83,800.0319	732.3202	17.8246	107,419.7614

LA Housing Element - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

Single Family Housing	5011.65 / 3159.52	18,770.434 1	164.0330	3.9925	24,061.0356
<b>Total</b>		<b>102,570.46 59</b>	<b>896.3531</b>	<b>21.8171</b>	<b>131,480.797 0</b>

**Mitigated**

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Apartments Low Rise	22374.3 / 14105.6	83,800.031 9	732.3202	17.8246	107,419.761 4
Single Family Housing	5011.65 / 3159.52	18,770.434 1	164.0330	3.9925	24,061.0356
<b>Total</b>		<b>102,570.46 59</b>	<b>896.3531</b>	<b>21.8171</b>	<b>131,480.797 0</b>

**8.0 Waste Detail**

**8.1 Mitigation Measures Waste**

**Category/Year**

	Total CO2	CH4	N2O	CO2e
	MT/yr			

LA Housing Element - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

Mitigated	50,374.953 9	2,977.0745	0.0000	124,801.816 1
Unmitigated	50,374.953 9	2,977.0745	0.0000	124,801.82

**8.2 Waste by Land Use**

**Unmitigated**

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Apartments Low Rise	157967	32,065.918 1	1,895.0415	0.0000	79,441.954 8
Single Family Housing	90196.3	18,309.035 8	1,082.0330	0.0000	45,359.861 3
<b>Total</b>		<b>50,374.953 9</b>	<b>2,977.0745</b>	<b>0.0000</b>	<b>124,801.81 61</b>

**Mitigated**

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Apartments Low Rise	157967	32,065.918 1	1,895.0415	0.0000	79,441.954 8
Single Family Housing	90196.3	18,309.035 8	1,082.0330	0.0000	45,359.861 3
<b>Total</b>		<b>50,374.953 9</b>	<b>2,977.0745</b>	<b>0.0000</b>	<b>124,801.81 61</b>

## LA Housing Element - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied****9.0 Operational Offroad**

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

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**Fire Pumps and Emergency Generators**

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

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
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**User Defined Equipment**

Equipment Type	Number
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**11.0 Vegetation**

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LA Housing Element - Growth Inducement (220,000 units) - Los Angeles-South Coast County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

**LA Housing Element - Growth Inducement (220,000 units)**

**Los Angeles-South Coast County, Annual**

**1.0 Project Characteristics**

**1.1 Land Usage**

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Apartments Low Rise	179,740.00	Dwelling Unit	1,000.00	179,740,000.00	514056
Single Family Housing	40,260.00	Dwelling Unit	1,000.00	72,468,000.00	115144

**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>	11			<b>Operational Year</b>	2029
<b>Utility Company</b>	Southern California Edison				
<b>CO2 Intensity (lb/MWhr)</b>	377.41	<b>CH4 Intensity (lb/MWhr)</b>	0.016	<b>N2O Intensity (lb/MWhr)</b>	0.003

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

Project Characteristics - Adjusted to reflect comply with RPS requirements.

Vehicle Trips - Traffic Data

Woodstoves - SCAQMD Rule 445; new development may not have a wood-burning fireplace.

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	10,000.00	10.00
tblConstructionPhase	NumDays	6,000.00	10.00
tblConstructionPhase	NumDays	15,500.00	10.00
tblConstructionPhase	NumDays	155,000.00	10.00
tblConstructionPhase	NumDays	11,000.00	10.00
tblConstructionPhase	NumDays	11,000.00	10.00
tblFireplaces	NumberWood	8,987.00	0.00

LA Housing Element - Growth Inducement (220,000 units) - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

tblFireplaces	NumberWood	2,013.00	0.00
tblGrading	AcresOfGrading	30.00	46,500.00
tblGrading	AcresOfGrading	15.00	9,000.00
tblLandUse	LotAcreage	11,233.75	1,000.00
tblLandUse	LotAcreage	13,071.43	1,000.00
tblProjectCharacteristics	CH4IntensityFactor	0.033	0.016
tblProjectCharacteristics	CO2IntensityFactor	390.98	377.41
tblProjectCharacteristics	N2OIntensityFactor	0.004	0.003
tblVehicleTrips	DV_TP	11.00	0.00
tblVehicleTrips	HO_TL	8.70	7.96
tblVehicleTrips	HS_TL	5.90	7.96
tblVehicleTrips	HW_TL	14.70	7.96
tblVehicleTrips	PB_TP	3.00	0.00
tblVehicleTrips	PR_TP	86.00	100.00
tblVehicleTrips	ST_TR	8.14	0.00
tblVehicleTrips	ST_TR	9.54	-1.69
tblVehicleTrips	SU_TR	6.28	0.00
tblVehicleTrips	SU_TR	8.55	-1.69
tblVehicleTrips	WD_TR	7.32	0.00
tblVehicleTrips	WD_TR	9.44	-1.69

**2.0 Emissions Summary**

**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
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LA Housing Element - Growth Inducement (220,000 units) - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

Category	tons/yr										MT/yr					
Area	1,137.0726	75.8795	2,957.1655	2.5664		125.6679	125.6679		125.6679	125.6679	14,723.1598	48,611.6651	63,334.8249	73.2374	0.8233	65,411.0949
Energy	18.7648	160.3533	68.2354	1.0235		12.9647	12.9647		12.9647	12.9647	0.0000	362,972.2307	362,972.2307	11.0744	4.8137	364,683.5704
Mobile	-29.0691	-29.5187	-284.4479	-0.6138	-74.0908	-0.4177	-74.5085	-19.7703	-0.3882	-20.1585	0.0000	-	-	-4.0925	-2.5278	-
Waste						0.0000	0.0000		0.0000	0.0000	26,366.3825	0.0000	26,366.3825	1,558.2086	0.0000	65,321.5966
Water						0.0000	0.0000		0.0000	0.0000	4,547.4806	49,138.1082	53,685.5888	469.1530	11.4191	68,817.3145
<b>Total</b>	<b>1,126.7682</b>	<b>206.7141</b>	<b>2,740.9530</b>	<b>2.9761</b>	<b>-74.0908</b>	<b>138.2149</b>	<b>64.1241</b>	<b>-19.7703</b>	<b>138.2444</b>	<b>118.4741</b>	<b>45,637.0229</b>	<b>400,994.0133</b>	<b>446,631.0362</b>	<b>2,107.5809</b>	<b>14.5283</b>	<b>503,649.9820</b>

**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	1,137.0726	75.8795	2,957.1655	2.5664		125.6679	125.6679		125.6679	125.6679	14,723.1598	48,611.6651	63,334.8249	73.2374	0.8233	65,411.0949
Energy	18.7648	160.3533	68.2354	1.0235		12.9647	12.9647		12.9647	12.9647	0.0000	362,972.2307	362,972.2307	11.0744	4.8137	364,683.5704
Mobile	-29.0691	-29.5187	-284.4479	-0.6138	-74.0908	-0.4177	-74.5085	-19.7703	-0.3882	-20.1585	0.0000	-	-	-4.0925	-2.5278	-
Waste						0.0000	0.0000		0.0000	0.0000	26,366.3825	0.0000	26,366.3825	1,558.2086	0.0000	65,321.5966
Water						0.0000	0.0000		0.0000	0.0000	4,547.4806	49,138.1082	53,685.5888	469.1530	11.4191	68,817.3145
<b>Total</b>	<b>1,126.7682</b>	<b>206.7141</b>	<b>2,740.9530</b>	<b>2.9761</b>	<b>-74.0908</b>	<b>138.2149</b>	<b>64.1241</b>	<b>-19.7703</b>	<b>138.2444</b>	<b>118.4741</b>	<b>45,637.0229</b>	<b>400,994.0133</b>	<b>446,631.0362</b>	<b>2,107.5809</b>	<b>14.5283</b>	<b>503,649.9820</b>

LA Housing Element - Growth Inducement (220,000 units) - Los Angeles-South Coast County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

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

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive 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	-29.0691	-29.5187	-284.4479	-0.6138	-74.0908	-0.4177	-74.5085	-19.7703	-0.3882	-20.1585	0.0000	-	-	-4.0925	-2.5278	-
Unmitigated	-29.0691	-29.5187	-284.4479	-0.6138	-74.0908	-0.4177	-74.5085	-19.7703	-0.3882	-20.1585	0.0000	59,727.990	59,727.990	-4.0925	-2.5278	-

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated Annual VMT	Mitigated Annual VMT
	Weekday	Saturday	Sunday		
Apartments Low Rise	0.00	0.00	0.00		
Single Family Housing	-68,039.40	-68,039.40	-68,039.40	-197,140,079	-197,140,079
Total	-68,039.40	-68,039.40	-68,039.40	-197,140,079	-197,140,079

4.3 Trip Type Information

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
Single Family Housing	7.96	7.96	7.96	40.20	19.20	40.60	100	0	0

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Low Rise	0.531474	0.067154	0.192702	0.126421	0.024086	0.006875	0.011564	0.007937	0.000940	0.000574	0.026268	0.000718	0.003288

LA Housing Element - Growth Inducement (220,000 units) - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

Single Family Housing	0.531474	0.067154	0.192702	0.126421	0.024086	0.006875	0.011564	0.007937	0.000940	0.000574	0.026268	0.000718	0.003288
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**5.0 Energy Detail**

Historical Energy Use: N

**5.1 Mitigation Measures Energy**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	177,265.78 47	177,265.78 47	7.5150	1.4091	177,873.56 39
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	177,265.78 47	177,265.78 47	7.5150	1.4091	177,873.56 39
NaturalGas Mitigated	18.7648	160.3533	68.2354	1.0235		12.9647	12.9647		12.9647	12.9647	0.0000	185,706.44 60	185,706.44 60	3.5594	3.4046	186,810.00 65
NaturalGas Unmitigated	18.7648	160.3533	68.2354	1.0235		12.9647	12.9647		12.9647	12.9647	0.0000	185,706.44 60	185,706.44 60	3.5594	3.4046	186,810.00 65

**5.2 Energy by Land Use - NaturalGas**

**Unmitigated**

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Apartments Low Rise	2.45878e+009	13.2582	113.2969	48.2115	0.7232		9.1602	9.1602		9.1602	9.1602	0.0000	131,210.07 18	131,210.07 18	2.5149	2.4055	131,989.78 76

LA Housing Element - Growth Inducement (220,000 units) - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

Single Family Housing	1.02122e+009	5.5066	47.0564	20.0240	0.3004		3.8046	3.8046		3.8046	3.8046	0.0000	54,496.3742	54,496.3742	1.0445	0.9991	54,820.2189
<b>Total</b>		<b>18.7648</b>	<b>160.3533</b>	<b>68.2354</b>	<b>1.0235</b>		<b>12.9647</b>	<b>12.9647</b>		<b>12.9647</b>	<b>12.9647</b>	<b>0.0000</b>	<b>185,706.4460</b>	<b>185,706.4460</b>	<b>3.5594</b>	<b>3.4046</b>	<b>186,810.0065</b>

**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	2.45878e+009	13.2582	113.2969	48.2115	0.7232		9.1602	9.1602		9.1602	9.1602	0.0000	131,210.0718	131,210.0718	2.5149	2.4055	131,989.7876
Single Family Housing	1.02122e+009	5.5066	47.0564	20.0240	0.3004		3.8046	3.8046		3.8046	3.8046	0.0000	54,496.3742	54,496.3742	1.0445	0.9991	54,820.2189
<b>Total</b>		<b>18.7648</b>	<b>160.3533</b>	<b>68.2354</b>	<b>1.0235</b>		<b>12.9647</b>	<b>12.9647</b>		<b>12.9647</b>	<b>12.9647</b>	<b>0.0000</b>	<b>185,706.4460</b>	<b>185,706.4460</b>	<b>3.5594</b>	<b>3.4046</b>	<b>186,810.0065</b>

**5.3 Energy by Land Use - Electricity**

**Unmitigated**

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Apartments Low Rise	7.21095e+008	123,444.5200	5.2333	0.9813	123,867.7659
Single Family Housing	3.14394e+008	53,821.2647	2.2817	0.4278	54,005.7980

LA Housing Element - Growth Inducement (220,000 units) - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

<b>Total</b>		<b>177,265.78</b>	<b>7.5150</b>	<b>1.4091</b>	<b>177,873.563</b>
		<b>47</b>			<b>9</b>

**Mitigated**

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Apartments Low Rise	7.21095e+008	123,444.5200	5.2333	0.9813	123,867.7659
Single Family Housing	3.14394e+008	53,821.2647	2.2817	0.4278	54,005.7980
<b>Total</b>		<b>177,265.78</b>	<b>7.5150</b>	<b>1.4091</b>	<b>177,873.563</b>
		<b>47</b>			<b>9</b>

**6.0 Area Detail**

**6.1 Mitigation Measures Area**

	ROG	NOx	CO	SO2	Fugitive 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	1,137.0726	75.8795	2,957.1655	2.5664		125.6679	125.6679		125.6679	125.6679	14,723.1598	48,611.6651	63,334.8249	73.2374	0.8233	65,411.0949



LA Housing Element - Growth Inducement (220,000 units) - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

Hearth	78.7578	49.7706	690.5303	2.4466		113.0910	113.0910		113.0910	113.0910	14,723.1598	44,905.6446	59,628.8045	69.6885	0.8233	61,616.3507
Landscaping	68.0548	26.1089	2,266.6352	0.1198		12.5769	12.5769		12.5769	12.5769	0.0000	3,706.0204	3,706.0204	3.5490	0.0000	3,794.7441
<b>Total</b>	<b>1,137.0726</b>	<b>75.8795</b>	<b>2,957.1655</b>	<b>2.5664</b>		<b>125.6679</b>	<b>125.6679</b>		<b>125.6679</b>	<b>125.6679</b>	<b>14,723.1598</b>	<b>48,611.6651</b>	<b>63,334.8249</b>	<b>73.2374</b>	<b>0.8233</b>	<b>65,411.0949</b>

**7.0 Water Detail**

**7.1 Mitigation Measures Water**

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	53,685.5888	469.1530	11.4191	68,817.3145
Unmitigated	53,685.5888	469.1530	11.4191	68,817.3145

**7.2 Water by Land Use**

**Unmitigated**

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Apartments Low Rise	11710.8 / 7382.89	43,861.1261	383.2980	9.3294	56,223.7459

LA Housing Element - Growth Inducement (220,000 units) - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

Single Family Housing	2623.1 / 1653.69	9,824.4628	85.8550	2.0897	12,593.5686
<b>Total</b>		<b>53,685.5888</b>	<b>469.1530</b>	<b>11.4191</b>	<b>68,817.3145</b>

**Mitigated**

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Apartments Low Rise	11710.8 / 7382.89	43,861.1261	383.2980	9.3294	56,223.7459
Single Family Housing	2623.1 / 1653.69	9,824.4628	85.8550	2.0897	12,593.5686
<b>Total</b>		<b>53,685.5888</b>	<b>469.1530</b>	<b>11.4191</b>	<b>68,817.3145</b>

**8.0 Waste Detail**

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**8.1 Mitigation Measures Waste**

**Category/Year**

	Total CO2	CH4	N2O	CO2e
	MT/yr			



LA Housing Element - Growth Inducement (220,000 units) - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

Mitigated	26,366.3825	1,558.2086	0.0000	65,321.5966
Unmitigated	26,366.3825	1,558.2086	0.0000	65,321.5966

**8.2 Waste by Land Use**

**Unmitigated**

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Apartments Low Rise	82680.4	16,783.3740	991.8690	0.0000	41,580.0987
Single Family Housing	47209	9,583.0085	566.3396	0.0000	23,741.4979
<b>Total</b>		<b>26,366.3825</b>	<b>1,558.2086</b>	<b>0.0000</b>	<b>65,321.5966</b>

**Mitigated**

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Apartments Low Rise	82680.4	16,783.3740	991.8690	0.0000	41,580.0987
Single Family Housing	47209	9,583.0085	566.3396	0.0000	23,741.4979
<b>Total</b>		<b>26,366.3825</b>	<b>1,558.2086</b>	<b>0.0000</b>	<b>65,321.5966</b>

LA Housing Element - Growth Inducement (220,000 units) - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

**9.0 Operational Offroad**

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

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**Fire Pumps and Emergency Generators**

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

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

**User Defined Equipment**

Equipment Type	Number
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**11.0 Vegetation**

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# Appendix D

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Public Health Effects and Sierra Club v. County of Fresno White Paper



**OCTOBER 2019**

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**PREPARED FOR:**  
City of Los Angeles,  
Department of City Planning

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**AIR QUALITY AND**

**HEALTH EFFECTS**

SIERRA CLUB V. COUNTY OF FRESNO

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# INTRODUCTION

In response to the California Supreme Court decision on December 24, 2018, *Sierra Club v. County of Fresno (Friant Ranch)*, this paper provides a supplemental discussion on the potential for identifiable health impacts to result from air pollutants analyzed in City of Los Angeles (City) environmental documents prepared pursuant to the California Environmental Quality Act (CEQA). The discussion focuses on significant impacts identified in City Environmental Impact Reports (EIRs) and the feasibility of directly relating any identified significant adverse air quality impact to likely health consequences. The Supreme Court opinion in *Friant Ranch* requires projects with significant air quality impacts to “relate the expected adverse air quality impacts to likely health consequences or explain why it is not feasible at the time of drafting to provide such an analysis, so that the public may make informed decisions regarding the costs and benefits of the project” (*Friant Ranch*, page 6). The *Friant Ranch* decision also states that providing “only a general description of symptoms that are associated with exposure”... “fail[s] to indicate the concentrations at which such pollutants would trigger the identified symptoms....” and “the public would have no idea of the health consequences that result when more pollutants are added to a nonattainment basin”. This paper provides information to the public regarding health consequences associated with exposure to air pollutants and explains why direct correlation of a project’s pollutant emissions and anticipated health effects is currently infeasible, as no expert agency has approved a quantitative method to reliably and meaningfully translate mass emission estimates of criteria air pollutants to specific health effects for the scale of projects typically analyzed in City EIRs.

# BACKGROUND AND METHODOLOGY

The purpose of CEQA is to inform the public as to the potential for a proposed project to result in one or more significant adverse effects on the environment (including health effects). This includes the potential for a project to result in a considerable contribution towards one or more significant cumulative impacts. CEQA does not require detailed analysis of impacts that are found to be less than significant or less than a considerable contribution to a significant cumulative impact.

In accordance with CEQA requirements and the CEQA review process, the City assesses air quality impacts of proposed local plans and development projects, requires mitigation of potentially significant air quality impacts by conditioning discretionary permits, and monitors and enforces implementation of such mitigation. The State CEQA Guidelines Section 15064.7 states that the significance criteria established by the applicable air quality management district or air pollution control district, when available, may be relied upon to make determinations of significance. The City is located within the South Coast Air Basin (Air Basin), under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The City defers to threshold guidance established by the SCAQMD and utilizes the SCAQMD's *CEQA Air Quality Handbook* (approved by the AQMD Governing Board in 1993) and subsequent guidance provided on the SCAQMD website<sup>1</sup>. The SCAQMD is currently in the process of developing an *Air Quality Analysis Guidance Handbook* to replace the 1993 Handbook.

In addition, when considering potential air quality impacts under CEQA, consideration is given to the location of sensitive receptors within close proximity to land uses that emit toxic air contaminants (TACs). The California Air Resources Board (CARB) has published and adopted the *Air Quality and Land Use Handbook: A Community Health Perspective* (2005), which considers impacts to sensitive receptors from facilities that emit TAC emissions. CARB has also published *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways: Technical Advisory*, a supplement to the handbook that is intended to provide scientifically based strategies to reduce exposure to traffic emissions near high-volume roadways in order to protect public health and promote equity and environmental justice. The SCAQMD has also adopted land use planning guidelines in

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<sup>1</sup> SCAQMD, *Air Quality Analysis Guidance*, <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook#>. Accessed August 2019.

the *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning* (2005). Together, the documents introduce land use-related policies and strategies that rely on design and distance parameters to minimize emissions and lower potential health risks.

It should also be noted that a host of other regional and local plans also generally address issues of air quality and public health. These include the Southern California Association of Governments (SCAG's) Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS), SCAQMD's Air Quality Management Plan (AQMP), City of Los Angeles' General Plan (including the Framework, Air Quality, Mobility 2035, and Health and Wellness Elements), and City of Los Angeles' Green New Deal (Sustainable pLAN 2019). These contain policies and programs for the protection of the environment and health through improved air quality and serve to provide additional critical guidance for the betterment of public health for the region and City.

## CEQA THRESHOLDS OF SIGNIFICANCE

Certain air pollutants have been recognized to cause notable health problems and consequential damage to the environment either directly or in reaction with other pollutants, due to their presence in elevated concentrations in the atmosphere. Such pollutants have been identified and regulated as part of an overall endeavor to prevent further deterioration and facilitate improvement in air quality. The National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) have been set at levels considered safe to protect public health, including the health of sensitive populations such as asthmatics, children, and the elderly with a margin of safety, and to protect public welfare, including protection against decreased visibility and damage to animals, crops, vegetation, and buildings<sup>2</sup>. As the scientific methods for the study of air pollution health effects have progressed over the past decades, adverse effects have been shown to occur at lower levels of exposure. For some pollutants, no clear thresholds for effects have been demonstrated. New findings over time have, in turn, led to the revision and lowering of NAAQS which, in the judgment of the U.S. Environmental Protection Agency (EPA), are necessary to protect public health. Ongoing assessments of the scientific evidence from health studies continue to be an important part of setting and informing revisions to federal and state air quality standards<sup>3</sup>.

The six principal pollutants for which national and state criteria and standards have been promulgated, known as "criteria pollutants", and which are most relevant to current air quality planning and regulation in the

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<sup>2</sup> U.S. EPA, *NAAQS Table*, <https://www.epa.gov/criteria-air-pollutants/naaqs-table>. Accessed July 2019.

<sup>3</sup> SCAQMD, *Final 2016 AQMP*, 2017. Appendix I-69. <https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/appendix-i.pdf?sfvrsn=14>. Included as Attachment 1 of this memorandum.



Air Basin include: ozone ( $O_3$ ), respirable and fine particulate matter ( $PM_{10}$  and  $PM_{2.5}$ ), carbon monoxide (CO), nitrogen dioxide ( $NO_2$ ), sulfur dioxide ( $SO_2$ ), and lead (Pb). The State of California has also set standards for sulfates ( $SO_4$ ), which are a component of particulate matter, and a nuisance odor standard for hydrogen sulfide ( $H_2S$ ). The Air Basin is currently in non-attainment and exceeds air quality standards for two criteria pollutants: ozone and particulate matter. The Los Angeles County portion of the Air Basin is also designated non-attainment for lead.

Although the SCAQMD's primary mandate is attaining the State and National Ambient Air Quality Standards for criteria pollutants within the district, SCAQMD also has a general responsibility pursuant to the Health and Safety Code §41700 to control emissions of air contaminants and prevent endangerment to public health. Additionally, state law requires the SCAQMD to implement airborne toxic control measures (ATCM) adopted by the California Air Resources Board (CARB), and to implement the Air Toxics "Hot Spots" Act. As a result, the SCAQMD has regulated pollutants other than criteria pollutants such as volatile organic compounds (VOCs), TACs, greenhouse gases, and stratospheric ozone depleting compounds. The SCAQMD has developed a number of rules to control non-criteria pollutants from both new and existing sources. These rules originated through state directives, Clean Air Act (CAA) requirements, or the SCAQMD rulemaking process.

As such, in addition to criteria pollutants, VOCs and TACs are also of concern in the Air Basin. Some VOCs are also classified by the state as TACs. While there are no specific VOC ambient air quality standards, VOCs are a prime component (along with  $NO_x$ ) of the photochemical processes by which such criteria pollutants as ozone, nitrogen dioxide, and certain fine particles are formed. They are therefore regulated as "precursors" to formation of these criteria pollutants.

TACs is a term used to describe airborne pollutants that may be expected to result in an increase in mortality or serious illness or which may pose a present or potential hazard to human health, and include both carcinogens and non-carcinogens. CARB and the California Office of Environmental Health Hazard Assessment (OEHHA) determine if a substance should be formally identified, or "listed," as a TAC in California. CARB has listed approximately 200 toxic substances, including those identified by the EPA, which are identified on the California Air Toxics Program's TAC List. TACs are also not classified as "criteria" air pollutants. The effects of TACs can be diverse and their health impacts tend to be local rather than regional; consequently ambient air quality standards for these pollutants have not been established, and analysis of health effects is instead based on cancer risk and exposure levels.

To achieve and maintain air quality standards, the SCAQMD has established numerical emission indicators of significance for regional and localized air quality impacts for both construction and operational phases of a local plan or project. The SCAQMD has established the thresholds based on "scientific and factual data that is contained in the federal and state Clean Air Acts" and recommends "that these thresholds be used by

lead agencies in making a determination of significance.”<sup>4</sup> The numerical emission indicators are based on the recognition that the Air Basin is a distinct geographic area with a critical air pollution problem for which ambient air quality standards have been promulgated to protect public health<sup>5</sup>. SCAQMD’s thresholds identified below represent the maximum emissions from a plan or project that are not expected to cause or contribute to an exceedance of the most stringent applicable national or state ambient air quality standard. By analyzing a plan or project’s emissions against the thresholds, EIRs assess whether these emissions directly contribute to any regional or local exceedances of the applicable ambient air quality standards and exposure levels.

*Note: In the thresholds referenced below, “emissions” refer to the actual quantity of pollutant measured in pounds per day (ppd). “Concentrations” refer to the amount of pollutant material per volumetric unit of air and are measured in parts per million (ppm), parts per billion (ppb), or micrograms per cubic meter (µg/m<sup>3</sup>).*

## Construction (Regional and Localized)

Given that construction impacts are temporary and limited to the construction phase, the SCAQMD has established numeric indicators of significance specific to construction activity. Based on the indicators in the SCAQMD *CEQA Air Quality Handbook*, a project would potentially cause or contribute to an exceedance of an ambient air quality standard if the following would occur:

- Regional construction emissions from both direct and indirect sources would exceed any of the following SCAQMD prescribed daily emissions thresholds:<sup>6</sup>
  - 75 pounds per day for VOC
  - 100 pounds per day for NO<sub>x</sub>
  - 550 pounds per day for CO
  - 150 pounds per day for SO<sub>2</sub>
  - 150 pounds per day for PM<sub>10</sub>
  - 55 pounds per day for PM<sub>2.5</sub>

In addition, the SCAQMD has developed a methodology to assess the potential for localized emissions to cause an exceedance of applicable ambient air quality standards or ambient concentration limits. The localized significance thresholds are only applicable to NO<sub>x</sub>, CO, PM<sub>10</sub> and PM<sub>2.5</sub>. The SCAQMD has established conservative screening criteria that can be used to determine the maximum allowable daily emissions that would satisfy the localized significance thresholds and therefore not cause or contribute to an exceedance of the applicable

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<sup>4</sup> SCAQMD, *CEQA Air Quality Handbook 1993*, Page 6-2.

<sup>5</sup> Ibid.

<sup>6</sup> SCAQMD, *Air Quality Significance Thresholds*, March 2015. <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2>. Accessed August 2019.

ambient air quality standards without project-specific dispersion modeling. The screening criteria depend on: (1) the area in which the Project is located, (2) the size of the Project Site, and (3) the distance between the Project Site and the nearest sensitive receptor. Otherwise, impacts would be considered significant if the following would occur:

- Maximum daily localized emissions of NO<sub>x</sub> and/or CO during construction are greater than the applicable localized significance thresholds, resulting in predicted ambient concentrations in the vicinity of the Project Site greater than the most stringent ambient air quality standards for NO<sub>2</sub> and/or CO.<sup>7</sup>
- Maximum daily localized emissions of PM<sub>10</sub> and/or PM<sub>2.5</sub> during construction are greater than the applicable localized significance thresholds, resulting in predicted ambient concentrations in the vicinity of the Project Site to exceed 10.4 µg/m<sup>3</sup> over 24 hours (SCAQMD Rule 403 control requirement).

## Operation (Regional and Localized)

Based on the numeric indicators of significant in the SCAQMD *CEQA Air Quality Handbook*, a project would potentially cause or contribute to an exceedance of an ambient air quality standard if the following would occur:

- Operational emissions exceed any of the following SCAQMD daily regional numeric indicators:<sup>8</sup>
  - 55 pounds a day for VOC
  - 55 pounds per day for NO<sub>x</sub>
  - 550 pounds per day for CO
  - 150 pounds per day for SO<sub>2</sub>
  - 150 pounds per day for PM<sub>10</sub>
  - 55 pounds per day for PM<sub>2.5</sub>

In addition, the SCAQMD has developed a methodology to assess the potential for localized emissions to cause an exceedance of applicable ambient air quality standards. The localized significance thresholds are only applicable to NO<sub>x</sub>, CO, PM<sub>10</sub> and PM<sub>2.5</sub>. The SCAQMD has established conservative screening criteria that can be used to determine the maximum allowable daily emissions that would satisfy the localized significance thresholds and therefore not cause or contribute to an exceedance of the applicable ambient air quality

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<sup>7</sup> SCAQMD, *Final Localized Significance Threshold Methodology*, 2008, <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>. Accessed August 2019.

<sup>8</sup> SCAQMD, *Air Quality Significance Thresholds*, March 2015. <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2>. Accessed August 2019.

standards without project-specific dispersion modeling. The screening criteria depend on: (1) the area in which the Project is located, (2) the size of the Project Site, and (3) the distance between the Project Site and the nearest sensitive receptor. Otherwise, impacts would be considered significant if the following would occur:

- Maximum daily localized emissions of NO<sub>x</sub> and/or CO during operation are greater than the applicable localized significance thresholds, resulting in predicted ambient concentrations in the vicinity of the Project Site greater than the most stringent ambient air quality standards for NO<sub>2</sub> and/or CO<sup>9</sup>.
- Maximum daily localized emissions of PM<sub>10</sub> and/or PM<sub>2.5</sub> during operation are greater than the applicable localized significance thresholds, resulting in predicted ambient concentrations in the vicinity of the Project Site to exceed 2.5 µg/m<sup>3</sup> over 24 hours (SCAQMD Rule 1303 allowable change in concentration).

## Toxic Air Contaminants

Based on the criteria set forth by the SCAQMD, the Project would expose sensitive receptors to substantial concentrations of TACs if any of the following would occur<sup>10</sup>:

- The Project emits carcinogenic materials or TACs that exceed the maximum incremental cancer risk of 10 in 1 million or a cancer burden greater than 0.5 excess cancer cases (in areas greater than or equal to 1 in 1 million) or an acute or chronic hazard index of 1.0.

## AVAILABLE MODELS

Current models used in CEQA in air quality analyses are designed to calculate and disclose the mass emissions expected from the construction and operation of a proposed project. The estimated emissions are then compared to significance thresholds, which are in turn, keyed to reducing emissions to levels that will not interfere with the region's ability to attain the health-based standards. While this serves to protect public health in the overall region, there is currently no methodology to determine the impact of emissions (e.g., pounds per

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<sup>9</sup> SCAQMD, *Final Localized Significance Threshold Methodology*, 2008, <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>. Accessed August 2019.

<sup>10</sup> SCAQMD, *CEQA Air Quality Handbook*, Chapter 6 (Determining the Air Quality Significance of a Project) and Chapter 10 (Assessing Toxic Air Pollutants), 1993; *South Coast Air Quality Management District Air Quality Significance Thresholds*, March 2015, <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2>. Accessed August 2019.

day) on concentration levels (e.g., parts per million or micrograms per cubic meter) in specific geographic areas.<sup>11</sup>

Based on SCAQMD guidance, the City utilizes the California Emissions Estimator Model (CalEEMod) to quantify construction and operational air quality impacts from land use projects. Potential TAC impacts are evaluated by conducting a qualitative analysis consistent with CARB and SCAQMD guidance, and may be followed by a more detailed analysis utilizing CARB's Hotspots Analysis and Reporting Program (HARP model) where the project results in a substantial source of TACs or if a project would site sensitive land uses in proximity to TAC sources. However, although CARB and SCAQMD provide guidance for TAC analysis, most land use projects analyzed in City EIRs do not contain substantial on-site sources of TACs, and siting new sensitive uses near existing TAC sources is generally not considered a CEQA impact.

The following table provides a summary of other common available air quality models and identifies their general purposes as well as limitations in quantifying emissions and health effects. Although there are a number of other models available (e.g. models to quantify emissions, dispersion models to determine pollutant concentrations, and regional-scale models which estimate health impacts), this suite of tools is currently not designed to meet the City's need to accurately analyze project-level health effects:

MODEL	SOURCE	PURPOSE	LIMITATIONS
<b>CalEEMod</b> California Emissions Estimator Model	SCAQMD	CalEEMod is a statewide land use <b>emissions computer model</b> 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 operational from a variety of land use projects.	The model can quantify emissions, but is not able to model concentrations or dispersion of pollutants or related health effects.
<b>AERMOD</b>	USEPA/American Meteorological Society	AERMOD models the <b>dispersion</b> of criteria air pollutant emissions over a period of time from discrete emission sources across a defined spatial boundary and can help inform exceedance of pollutant concentration standards. AERMOD provides more refined modeling than AERSCREEN, since it uses actual meteorological data (rather than simulated data) for the vicinity of the project site. <i>NOTE:</i> The U.S. EPA has adopted the	AERMOD can estimate pollutant concentrations of NO <sub>x</sub> , NO <sub>2</sub> , CO, SO <sub>2</sub> , PM <sub>10</sub> , PM <sub>2.5</sub> , total suspended particulates, lead, and other pollutants. However, AERMOD cannot estimate concentrations of VOCs, O <sub>3</sub> or secondary PM. While AERMOD can estimate concentrations for certain pollutants, no methods have been demonstrated to reliably and meaningfully connect pollutant concentrations to specific health effects.

<sup>11</sup> SMAQMD, *Friant Ranch Interim Recommendation*, 2019.

<http://www.airquality.org/LandUseTransportation/Documents/FriantInterimRecommendation.pdf>. Accessed August 2019. Included as Attachment 4 of this memorandum.

MODEL	SOURCE	PURPOSE	LIMITATIONS
		AERMOD air dispersion model into its list of regulatory approved models in place of the previously used ISCST3 (Industrial Source Complex Short Term) model and CARB recommends AERMOD, instead of ISCST3, for Hot Spots risk assessments.	
<b>AERSCREEN</b>	USEPA	AERSCREEN is a screening version of the AERMOD <b>dispersion model</b> , intended to produce concentration estimates that are equal to or greater than the estimates produced by AERMOD with a fully developed set of meteorological and terrain data, but the degree of conservatism will vary depending on the application. This program is useful as a screening Health Risk Assessment (HRA) for minor or temporary sources such as construction-only projects.	As with AERMOD, AERSCREEN can estimate concentrations for certain pollutants; however, AERSCREEN does not connect pollutant concentrations to specific health effects.
<b>BenMAP-CE</b> Environmental Benefits Mapping and Analysis Program - Community Edition	USEPA	BenMAP-CE is a <b>regional-scale model</b> that can be used to estimate the resulting <b>health impacts</b> from change in ambient PM <sub>2.5</sub> concentrations for related health endpoints such as premature mortality, hospital admissions, and emergency room visits. The USEPA CMAQ model can be used to predict changes in the ambient air concentration of ozone, the results of which can be used in BenMAP-CE to estimate the resulting health impacts.	The model is used for assessing impacts over large areas and populations and is not intended to be used for individual projects, as it would not provide meaningful or reliable results at the smaller scale.
<b>CalEnviroScreen</b> California Communities Environmental Health Screening Tool	OEHHA & CalEPA	CalEnviroScreen is a <b>mapping tool</b> that helps identify California communities that are most affected by many sources of pollution, identified by a data-driven scoring system.	While the tool is useful to identify communities disproportionately burdened by certain pollutants, the tool is not used to track or model dispersal of project emissions.
<b>CALINE-4</b>	Caltrans	CALINE-4 is a <b>line-source dispersion model</b> for predicting air pollutant concentrations at receptors near highways and arterial streets, specifically for CO, NO <sub>x</sub> , and PM. Caltrans guidance recommends only utilizing the tool for CO hot-spot analysis, and does not recommend using CALINE-4 to analyze any other pollutant.	CALINE-4 is limited to estimating concentrations of CO, NO <sub>x</sub> , and PM from line sources such as roadways. CALINE-4 does not have the capability to evaluate concentrations of O <sub>3</sub> or secondary PM, or concentrations from other types of emissions sources (e.g., point, volume, or area sources). CALINE-4 is also not able to connect pollutant concentrations to specific health effects.

MODEL	SOURCE	PURPOSE	LIMITATIONS
<b>CAMx</b> Compressive Air Quality Model	Ramboll & Environ	CAMx is a <b>grid-based dispersion model</b> that simulates the chemical interactions and three-dimensional dispersion patterns on a regional, statewide, and national scale.	Since CAMx is designed to model emissions on a regional, statewide, and national scale, it is unsuitable for project-level analysis.
<b>CMAQ</b> Community Multiscale Air Quality Modeling System	USEPA	CMAQ is an atmospheric <b>dispersion model</b> consisting of a suite of programs for conducting air quality model simulations. CMAQ combines current knowledge in atmospheric science and air quality modeling, multi-processor computing techniques, and an open-source framework to deliver estimates of ozone, particulates, toxics and acid deposition. The program can be used to predict the concentration and deposition of both criteria pollutants and TACs.	There are limitations on the minimum modeling domain at which the model is still reasonably accurate. (e.g. the EPA recommends nesting a local regional model within a larger regional domain. However, the EPA recognized that expanding to a larger regional domain needs more data, which currently may not be available to the public. In addition, the minimum resolution of the CMAQ model is 1 sq. km., meaning that it would have difficulty in modeling impact areas that are less than 247 acres with meaningful or reliable results.)
<b>EMFAC</b> EMissions FACTor	CARB	EMFAC2017 is used to estimate <b>emissions</b> from on-road vehicles in California.	The model can quantify emissions, but is not able to model concentrations or dispersion of pollutants or related health effects.
<b>HARP</b> Hotspots Analysis and Reporting Program	CARB	HARP is a software suite that addresses the programmatic requirements of the Air Toxics "Hot Spots" Program (Assembly Bill 2588) and can perform air <b>dispersion</b> runs and <b>health risk assessments</b> , as well as can create and manage facility and emissions data. HARP is useful for determining how increases in specific TAC concentrations could affect receptors in terms of the increased cancer risks, chronic hazards, and acute hazards.	The tool is not used for evaluation of criteria air pollutants and related health effects.
<b>OFFROAD</b>	CARB	OFFROAD calculates <b>emissions</b> from off-road sources. The OFFROAD model is now being replaced by category specific methods and inventory models that are being developed for specific regulatory support projects.	The model can quantify emissions, but is not able to model concentrations or dispersion of pollutants or related health effects. In addition, the model is not comprehensive and lacks emissions forecasts for certain types of equipment.
<b>Roadway Construction Emissions Model</b>	SMAQMD	The model can be used to assist roadway project proponents with determining the <b>emission</b> impacts of their projects.	The Roadway Construction Emissions Model can quantify emissions, but is not able to model concentrations or dispersion of pollutants or related health effects.

As demonstrated above, while a number of models and tools are available to quantify emissions and pollutant concentrations, these models are limited by a number of factors in determining health impacts of individual development and infrastructure projects as well as local plan-level projects. The USEPA currently performs health impact assessments (HIAs) using the CMAQ model for pollutant transport modeling and BENMAP for health impact calculations. However, as described in further detail below, these models are designed to estimate health impacts over a large scale (e.g. city-wide, state-wide). In addition, the CMAQ model requires inputs such as regional sources of pollutants and global meteorological data, which are generally not accessible. In addition to the unsuitability of regional models in providing reliable results for local-level plans or individual projects, other general limitations of the current suite of models include limitations on the ability of certain tools to model concentrations or the dispersion of pollutants for all types of sources, other models only addressing a partial and incomplete range of pollutants and secondary pollutants, and limitations on being able to correlate identified concentrations to related health effects.

As such, neither the SCAQMD, CARB, “nor any air district currently have methodologies that would provide Lead Agencies and CEQA practitioners with a consistent, reliable, and meaningful analysis to correlate specific health impacts that may result from a proposed project’s mass emissions”.<sup>12</sup>

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<sup>12</sup> SMAQMD, *Friant Ranch Interim Recommendation*, 2019.

<http://www.airquality.org/LandUseTransportation/Documents/FriantInterimRecommendation.pdf>. Accessed August 2019. Included as Attachment 4 of this memorandum.



# AIR QUALITY AND HEALTH EFFECTS

The following information and analysis of health effects is relevant where a City EIR concludes that regional or localized air pollutant emissions would exceed the SCAQMD's thresholds of significance identified above and such impacts are deemed significant and unavoidable.

Ambient air pollution is a general public health concern, and in particular, Southern California has a long and well-documented history in battling poor air quality. Since the mid-20th century, the greater Los Angeles region has been at the forefront of air pollution science, low-emissions technology development, and innovative air quality regulation. These efforts have led to substantial and noticeable improvements in air quality and public health within the South Coast Air Basin, all during a period of dramatic increases in economic activity, population, and vehicle miles traveled. Despite these successes, the health of the region's residents continues to be seriously affected by the poor air quality that confronts the region.<sup>13</sup> Ambient air pollution continues to be linked to increases in respiratory illness (morbidity) and increases in death rates (mortality).<sup>14</sup>

Air pollution has many effects on the health of both adults and children. Adverse health outcomes linked to air pollution include asthma, cardiovascular effects, premature mortality, respiratory effects, cancer, reproductive effects, neurological effects, and other health outcomes.

The evidence linking these effects to air pollutants is derived from population based (i.e., large-scale) observational and field studies (epidemiological) as well as controlled laboratory studies involving human subjects and animals. There have been an increasing number of studies focusing on the mechanisms (that is, on learning how specific organs, cell types, and biochemicals are involved in the human body's response to air pollution) and specific pollutants responsible for individual effects. Yet the underlying biological pathways for these effects are not always clearly understood.

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<sup>13</sup> SCAQMD, *Final 2016 AQMP*, 2017, Page Preface. <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/final-2016-aqmp>. Accessed August 2019.

<sup>14</sup> SCAQMD, *Final 2016 AQMP*, 2017, Page Appendix I-1. <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/final-2016-aqmp>. Accessed August 2019. Included as Attachment 1 of this memorandum.

Although individuals inhale pollutants as a mixture under ambient conditions, the regulatory framework and the control measures developed are mostly pollutant-specific. Individual pollutants usually differ in their sources, their times and places of occurrence, the kinds of health effects they may cause, and their overall levels of health risk. To meet the air quality standards, comprehensive plans are developed, including the Air Quality Management Plan (AQMP) and Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). These plans examine multiple pollutants, cumulative effects, and transport issues related to attaining healthful air quality in the region. In addition, a host of regulatory standards function to identify and limit exposure of air pollutants and toxic air contaminants.

## HEALTH EFFECTS ADDRESSED IN PLANS AND REGULATORY STANDARDS

As previously stated, the NAAQS and CAAQS have been set at levels considered safe to protect public health. These standards are informed by and revised based on evolving scientific evidence of air pollution health effects. The SCAQMD (together with SCAG) has the responsibility for ensuring that national and state ambient air quality standards are achieved and maintained throughout the Air Basin. Failure to comply with these standards puts state and local agencies at risk for penalties such as: lawsuits, fines, a federal takeover of state implementation plans, and a loss of funds from federal agencies such as the Federal Highway Administration and Federal Transit Administration.

### Criteria Pollutants

To meet the standards, the SCAQMD has adopted a series of AQMPs, which serve as a regional blueprint to develop and implement an emission reduction strategy that will bring the area into attainment with the standards in a timely manner. The 2016 AQMP includes strategies to ensure that rapidly approaching attainment deadlines for ozone and PM<sub>2.5</sub> are met and that public health is protected to the maximum extent feasible. The most significant air quality challenge in the Air Basin is to reduce NO<sub>x</sub> emissions<sup>15</sup> sufficiently to meet the upcoming ozone standard deadlines, as NO<sub>x</sub> plays a critical role in the creation of ozone. The AQMP's strategy to meet the 8-hour ozone standard in 2023 should lead to sufficient NO<sub>x</sub> emission reductions to attain the 1-hour

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<sup>15</sup> NO<sub>x</sub> emissions are a precursor to the formation of both ozone and secondary PM<sub>2.5</sub>.

ozone standard by 2022. Since  $\text{NO}_x$  emissions also lead to the formation of  $\text{PM}_{2.5}$ , the  $\text{NO}_x$  reductions needed to meet the ozone standards will likewise lead to improvement of  $\text{PM}_{2.5}$  levels and attainment of  $\text{PM}_{2.5}$  standards.<sup>1617</sup>

The SCAQMD's strategy to meet national and state standards distributes the responsibility for emission reductions across federal, state and local levels and industries. The 2016 AQMP is composed of stationary and mobile source emission reductions from traditional regulatory control measures, incentive-based programs, co-benefits from climate programs, mobile source strategies, and reductions from federal sources, which include aircraft, locomotives and ocean-going vessels. These strategies are to be implemented in partnership with the CARB and U.S. EPA. In addition, SCAG recently approved their 2016-2040 Regional Transportation Plan/Sustainable Communities Strategies (2016-2040 RTP/SCS) Plan<sup>18</sup> which includes transportation programs, measures, and strategies generally designed to reduce vehicle miles traveled (VMT), which are contained in the AQMP.

Pursuant to California Health and Safety Code Section 40460, SCAG has the responsibility of preparing and approving the portions of the AQMP relating to the regional demographic projections and integrated regional land use, housing, employment, and transportation programs, measures, and strategies. The SCAQMD combines its portion of the Plan with those prepared by SCAG.<sup>19</sup> The RTP/SCS and Transportation Control Measures, included as Appendix IV-C of the 2016 AQMP for the Air Basin, are based on SCAG's 2016-2040 RTP/SCS.

The 2016 AQMP forecasts the 2031 emissions inventories "with growth" based on SCAG's 2016-2040 RTP/SCS. The region is projected to see a 12 percent growth in population, 16 percent growth in housing units, 23 percent growth in employment, and 8 percent growth in vehicle miles traveled between 2012 and 2031. Despite this regional growth, air quality has improved substantially over the years, primarily due to the effects of air quality control programs at the local, state and federal levels. Figure 1, provided below, shows the trends since 1990 of the 8-hour ozone levels, the 1-hour ozone levels, and annual average  $\text{PM}_{2.5}$  concentrations (since 1999), compared to the regional gross domestic product, total employment and population. Human activity in the region has an impact on achieving reductions in emissions. However, the ozone and particulate matter levels continue

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<sup>16</sup> Estimates are based on the inventory and modeling results and are relative to the baseline emission levels for each attainment year (see Final 2016 AQMP for detailed discussion).

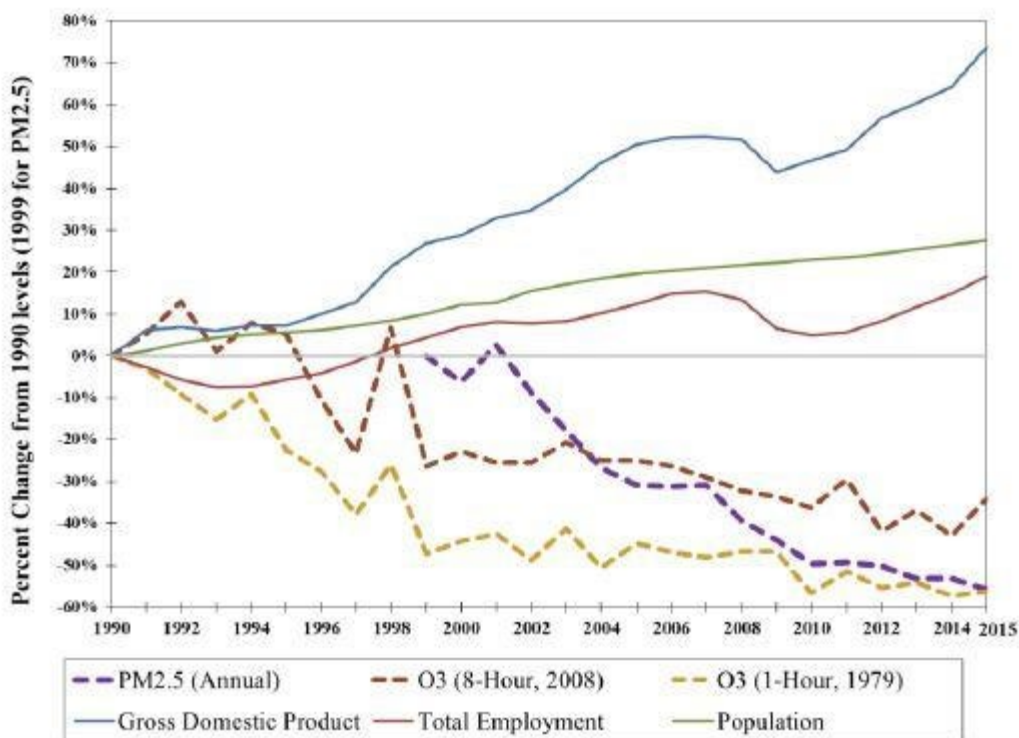
<sup>17</sup> SCAQMD, *Final 2016 AQMP*, 2017. Page ES-2. <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/final-2016-aqmp>. Accessed August 2019.

<sup>18</sup> SCAG, *Final 2016 RTP/SCP*, 2016 <http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx>. Accessed August 2019.

<sup>19</sup> SCAQMD, *Final 2016 AQMP*, 2017. Page ES-2. <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/final-2016-aqmp>. Accessed August 2019.

to trend downward as the economy and population increase, demonstrating that it is possible to maintain a healthy economy while improving public health through air quality improvements.<sup>20</sup>

Figure 1:  
Percent Change in Air Quality Along with  
Demographic Data for the 4-County Region (1990-2015)



Source: SCAQMD, Figure 1-4 of the Final 2016 AQMP.

## Consistency with AQMP and 2016-2040 RTP/SCS Growth Assumptions

As discussed above, the 2016 AQMP incorporates the SCAG 2016-2040 RTP/SCS and updated emission inventory methodologies for various source categories to demonstrate attainment with applicable state and federal standards. With regard to land use, the 2016-2040 RTP/SCS land use control measures (i.e., goals and policies) focus on the reduction of vehicle trips and VMT.

The City's EIRs provide an analysis of a project's consistency with both the AQMP and the 2016-2040 RTP/SCS. The 2016-2040 RTP/SCS is expected to help SCAG reduce VMT, with reductions in per capita transportation emissions of 18 percent by 2035 and 21-percent by 2040. In addition, the 2016-2040 RTP/SCS provides a 2012 Base Year projected daily Total VMT per capita of 21.5 and 18.4 daily Total VMT per capita for the

<sup>20</sup> SCAQMD, *Final 2016 AQMP*, 2017. Page 1-6. <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/final-2016-aqmp>. Accessed August 2019.

2040 Plan Year. As the AQMP control strategy is based on projections from local General Plans, projects which are consistent with local General Plans are considered consistent with the growth assumptions of the air quality related regional plans and their emissions are assumed to be accounted for in the AQMP emissions inventory. Projects which include amendments to General or Specific Plans, or are considered significant projects, undergo further scrutiny for AQMP consistency.

## Toxic Air Contaminants

In addition, the state's California Air Toxics Program is an established two-step process of risk identification and risk management to address potential health effects from exposure to toxic substances in the air. In the risk identification step, CARB and OEHHA determine if a substance should be formally identified, or "listed," as a TAC in California. In the risk management step, CARB reviews emission sources of an identified TAC to determine whether regulatory action is needed to reduce risk. Based on results of that review, CARB has promulgated a number of ATCMs, both for mobile and stationary sources. These ATCMs include measures such as limits on heavy-duty diesel motor vehicle idling and emission standards for off-road diesel construction equipment in order to reduce public exposure to diesel PM and other TACs. These actions are also supplemented by the AB 2588 Air Toxics "Hot Spots" program and SB 1731, which require facilities to report their air toxics emissions, assess health risks, notify nearby residents and workers of significant risks if present, and reduce their risk through implementation of a risk management plan. SCAQMD has further adopted two rules to limit cancer and non-cancer health risks from facilities located within its jurisdiction. Rule 1401 (New Source Review of Toxic Air Contaminants) regulates new or modified facilities, and Rule 1402 (Control of Toxic Air Contaminants from Existing Sources) regulates facilities that are already operating. Rule 1402 incorporates requirements of the AB 2588 program, including implementation of risk reduction plans for significant risk facilities.

City EIRs acknowledge that these plans and regulatory standards have been set at levels considered safe to protect public health and are part of the regulatory environment when considering local plan and project-level impacts.

# HEALTH EFFECTS OF CRITERIA POLLUTANTS AND TOXIC AIR CONTAMINANTS

A summary discussion of the health effects due to exposure of pollutants exceeding SCAQMD's significance thresholds is provided in City EIRs and an expanded discussion is provided below (substantially drawn from reviews presented in the SCAQMD's Final 2016 Air Quality Management Plan, Chapter 2 (Air Quality and Health Effects), March 2017). A more detailed discussion of the health effects of these pollutants is provided in Attachment 1 to this memorandum (SCAQMD Final 2016 Air Quality Management Plan, Appendix I: Health Effects)

## Ozone (O<sub>3</sub>)

Ozone is a gas that is formed when volatile organic compounds (VOCs) and NO<sub>x</sub>—both byproducts of internal combustion engine exhaust—undergo slow photochemical reactions in the presence of sunlight. Ozone concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperature conditions are favorable. Ozone is one of the most important air pollutants affecting human health in regions like Southern California. Ozone is a molecule built of three atoms of oxygen linked together in a very energetic combination. When ozone comes into contact with a surface it rapidly releases this extra force in the form of chemical energy. When this happens in biological systems, such as the respiratory tract, this energy can cause damage to sensitive tissues in the upper and lower airways.

The major subgroups of the population considered to be at increased risk from ozone exposure are outdoor exercising individuals including children and people with preexisting respiratory disease(s) such as asthma. The database identifying the former group as being at increased risk to ozone exposure is much stronger and more quantitative than that for the latter group, probably because of a larger number of studies conducted were with healthy individuals. The adverse effects reported with short-term ozone exposure are greater with increased activity because activity increases the breathing rate and the volume of air reaching the lungs, resulting in an increased amount of ozone reaching the lungs. Children may be a particularly vulnerable population to air pollution effects because they spend more time outdoors, are generally more active, and have a higher ventilation rate than adults. A number of adverse health effects associated with ambient ozone levels have been identified from laboratory and epidemiological studies. These include increased respiratory symptoms, damage to cells of the respiratory tract, decreases in lung function, increased susceptibility to respiratory infection, and increased risk of hospitalization.

The Children's Health Study, conducted by researchers at the University of Southern California, followed a cohort of children that live in 12 communities in southern California with differing levels of air pollution for several years. A publication from this study found that school absences in fourth graders for respiratory illnesses were associated with ambient ozone levels. An increase of 20 ppb ozone was associated with an 83 percent increase in illness related absence rates.<sup>21</sup> However, it is not recommended to base assumptions of health impacts off of a single example or study. It should also be noted that the study is based on one specific subgroup and may not apply to the general population. Furthermore, the study analyzed changes in regional air quality, and these region-wide changes could not be reasonably attributable to a single project or local plan based on existing science and models.

The number of hospital admissions and emergency room visits for all respiratory causes (infections, respiratory failure, chronic bronchitis, etc.) including asthma show a consistent increase as ambient ozone levels increase in a community. These excess hospital admissions and emergency room visits are observed when hourly ozone concentrations are as low as 0.08 to 0.10 ppm.

Numerous recent studies have found positive associations between increases in ozone levels and excess risk of mortality. These associations persist even when other variables including season and levels of particulate matter are accounted for. This indicates that ozone mortality effects are independent of other pollutants.<sup>22</sup>

Several population-based studies suggest that asthmatics are more adversely affected by ambient ozone levels, as evidenced by increased hospitalizations and emergency room visits. Laboratory studies have attempted to compare the degree of lung function change seen in age and gender-matched healthy individuals versus asthmatics and those with chronic obstructive pulmonary disease. While the degree of change evidenced did not differ significantly, that finding may not accurately reflect the true impact of exposure on these respiration-compromised individuals. Since the respiration-compromised group may have lower lung function to begin with, the same degree of change may represent a substantially greater adverse effect overall.

A publication from the Children's Health Study focused on children and outdoor exercise. In communities with high ozone concentrations, the relative risk of developing asthma in children playing three or more sports was found to be over three times higher than in children playing no sports.<sup>23</sup> These findings indicate that new cases of asthma in children are associated with heavy exercise in communities with high levels of ozone. While

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<sup>21</sup> Gilliland FD, Berhane K, Rappaport EB, Thomas DC, Avol E, Gauderman WJ, London SJ, Margolis HG, McConnell R, Islam KT, Peters JM. *The Effects of Ambient Air Pollution on School Absenteeism Due to Respiratory Illnesses*. *Epidemiology*, 2001. 12(1):43-54.

<sup>22</sup> Bell ML, McDermott A, Zeger SL, Samet, JM, Dominici, F. *Ozone and Short-Term Mortality in 95 US Urban Communities, 1987-2000*. 2004. *JAMA* 292:2372-2378.

<sup>23</sup> McConnell R, Berhane K, Gilliland F, London SJ, Islam T, Gauderman WJ, Avol E, Margolis HG, Peters JM. *Asthma in exercising children exposed to ozone: a cohort study*. 2002. *Lancet*, 359:386-91.

it has long been known that air pollution can exacerbate symptoms in individuals with respiratory disease, this is among the first studies that indicate ozone exposure may be causally linked to asthma.

Some lung function responses (volume and airway resistance changes) observed after a single exposure to ozone exhibit attenuation or a reduction in magnitude with repeated exposures. Although it has been argued that the observed shift in response is evidence of a probable adaptation phenomenon, it appears that while functional changes may exhibit adaptation, biochemical and cellular changes which may be associated with episodic and chronic exposure effects may not exhibit similar adaptation. That is, internal damage to the respiratory system may continue with repeated ozone exposures, even if externally observable effects (chest symptoms and reduced lung function) disappear.

In a laboratory, exposure of human subjects to low levels of ozone causes reversible decrease in lung function as assessed by various measures such as respiratory volumes, airway resistance and reactivity, irritative cough and chest discomfort. Lung function changes have been observed with ozone exposure as low as 0.08 to 0.12 ppm for 6-8 hours under moderate exercising conditions. Similar lung volume changes have also been observed in adults and children under ambient exposure conditions (0.10 - 0.15 ppm). The responses reported are indicative of decreased breathing capacity and are reversible.

In laboratory studies, cellular and biochemical changes associated with respiratory tract inflammation have also been consistently reported in the airway lining after low level exposure to ozone. These changes include an increase in specific cell types and in the concentration of biochemical mediators of inflammation and injury such as cytokines and fibronectin. These inflammatory changes can be observed in healthy adults exposed to ozone in the range of 0.08 to 0.10 ppm.

The susceptibility to ozone observed under ambient conditions could be due to the combination of pollutants that coexist in the atmosphere or ozone may actually sensitize these subgroups to the effects of other pollutants. Some animal studies show results that indicate possible chronic effects including functional and structural changes of the lung. These changes indicate that repeated inflammation associated with ozone exposure over a lifetime may result in sufficient damage to respiratory tissue such that individuals later in life may experience a reduced quality of life in terms of respiratory function and activity level achievable. An autopsy study involving Los Angeles County residents provided supportive evidence of lung tissue damage (structural changes) attributable to air pollution. A study of birth outcomes in southern California found an increased risk for birth defects in the aortic and pulmonary arteries associated with ozone exposure in the second month of pregnancy.<sup>24</sup> This is the first study linking ambient air pollutants to birth defects in humans. Confirmation by further studies is needed. In summary, acute adverse effects associated with ozone exposures have been well

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<sup>24</sup> Ritz B, Yu F, Chapa G, Fruin S. *Effect of Air Pollution on Preterm Birth Among Children Born in Southern California between 1989 and 1993*. 2002. *Epidemiology*, 11(5)502-11.



documented, although the specific causal mechanism is still somewhat unclear. Additional research efforts are required to evaluate the long-term effects of air pollution and to determine the role of ozone in influencing chronic effects.

## Particulate Matter (PM<sub>10</sub> and PM<sub>2.5</sub>)

The human body naturally prevents the entry of larger particles into the body. However, small particles, with an aerodynamic diameter equal to or less than ten microns (PM<sub>10</sub>) and even smaller particles with an aerodynamic diameter equal to or less than 2.5 microns (PM<sub>2.5</sub>), can enter the body and are trapped in the nose, throat, and upper respiratory tract. These small particulates could potentially aggravate existing heart and lung diseases, change the body's defenses against inhaled materials, and damage lung tissue. The elderly, children, and those with chronic lung or heart disease are most sensitive to PM<sub>10</sub> and PM<sub>2.5</sub>. Lung impairment can persist for two to three weeks after exposure to high levels of particulate matter. Some types of particulates could become toxic after inhalation due to the presence of certain chemicals and their reaction with internal body fluids. The U.S. Environmental Protection Agency and the California Air Resources Board have recognized adverse health effects that may be associated with exposure to PM<sub>10</sub> and PM<sub>2.5</sub>, including:<sup>25</sup> (1) Increased respiratory symptoms, such as the irritation of the airways; (2) Coughing, or difficulty breathing; (3) Decreased lung function, particularly in children; (4) Aggravated asthma; (5) Development of chronic bronchitis; (6) Irregular heartbeat; (7) Increased respiratory and cardiovascular hospitalizations; and (8) Premature death in people with heart or lung disease.

Epidemiological studies have provided continued and consistent evidence for most of the effects listed above. An association between increased daily or several-day-average concentrations of PM<sub>10</sub> and excess mortality and morbidity is consistently reported from studies involving communities across the U.S. as well as in Europe, Asia, and South America.

A number of studies have evaluated the association between particulate matter exposure and indices of morbidity such as hospital admissions, emergency room visits or physician office visits for respiratory and cardiovascular diseases. The effects estimates are generally higher than the effects for mortality. The effects are associated with measures of PM<sub>10</sub> and PM<sub>2.5</sub>. Thus, it appears that when a relatively small number of people experience severe effects, larger numbers experience milder effects, which may relate either to the coarse or to the fine fraction of airborne particulate matter.

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<sup>25</sup> See, e.g., U.S. Environmental Protection Agency, *Health and the Environment*, [www.epa.gov/air/particlepollution/health.html](http://www.epa.gov/air/particlepollution/health.html). Accessed July 30, 2008; U.S. Environmental Protection Agency, *Particle Pollution and Your Health*, [www.epa.gov/airnow/particles-bw.pdf](http://www.epa.gov/airnow/particles-bw.pdf). Accessed July 30, 2008.; California Air Resources Board, *Health Effects of Particulate Matter and Ozone Air Pollution*, January 2004.

In the National Morbidity, Mortality, and Air Pollution Study (NMMAPS), hospital admissions for those 65 years or older were assessed in 14 cities. Hospital admissions for these individuals showed an increase of 6 percent for cardiovascular diseases and a 10 percent increase for respiratory disease admissions, per 50  $\mu\text{g}/\text{m}^3$  increase in  $\text{PM}_{10}$ . The excess risk for cardiovascular disease ranges from 3-10 percent per 50  $\mu\text{g}/\text{m}^3$   $\text{PM}_{10}$ . However, as noted below, this study analyzed indirect indicators of health impacts rather than direct health impacts, and other studies have demonstrated greater variability of the effects of PM increases in terms of number of medical visits.

Similarly, school absences, lost workdays and restricted activity days have also been used in some studies as indirect indicators of acute respiratory conditions. The results are suggestive of both immediate and delayed impact on these parameters following elevated particulate matter exposures. These observations are consistent with the hypothesis that increased susceptibility to infection follows particulate matter exposures.

Some studies have reported that short-term particulate matter exposure is associated with changes in lung function (lung capacity and breathing volume); upper respiratory symptoms (hoarseness and sore throat); and lower respiratory symptoms (increased sputum, chest pain and wheeze). The severity of these effects is widely varied and is dependent on the population studied, such as adults or children with and without asthma. Sensitive individuals, such as those with asthma or pre-existing respiratory disease, may have increased or aggravated symptoms associated with short-term particulate matter exposures. Several studies have followed the number of medical visits associated with pollutant exposures. A range of increases from 3 to 42 percent for medical visits for respiratory illnesses was found corresponding to a 50  $\mu\text{g}/\text{m}^3$  change in  $\text{PM}_{10}$ . A limited number of studies also looked at levels of  $\text{PM}_{2.5}$ . The findings suggest that both the fine and coarse fractions may have associations with some respiratory symptoms.

While most studies have evaluated the acute effects, some studies specifically focused on evaluating the effects of chronic exposure to  $\text{PM}_{10}$  and  $\text{PM}_{2.5}$ . Studies have analyzed the mortality of adults living in different U.S. cities. After adjusting for important risk factors, these studies found a consistent positive association of deaths and exposure to particulate matter. A similar association was observable in both total number of deaths and deaths due to cardiorespiratory causes. A shortening of lifespan was also reported in these studies.

Significant associations for  $\text{PM}_{2.5}$  for both total mortality and cardiorespiratory mortality were reported in a study using data from the American Cancer Society. A re-analysis of the data from this study confirmed the finding.<sup>26</sup> The Harvard Six Cities Study evaluated several size ranges of particulate matter and reported significant associations with  $\text{PM}_{15}$ ,  $\text{PM}_{2.5}$ , sulfates, and non-sulfate particles, but not with coarse particles ( $\text{PM}_{15}$ -

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<sup>26</sup> Krewski D, Burnett RT, Goldberg MS, Hoover K, Siemiatycki J, Abrahamowicz M, White WH, et al. *Reanalysis of the Harvard Six Cities Study and the American Cancer Society Study of Particulate Air Pollution and Mortality. A Special Report of the Institute's Particle Epidemiology Reanalysis Project*. 2000. Health Effects Institute.

PM<sub>2.5</sub>). An extension of the Harvard Six Cities Cohort confirmed the association of mortality with PM<sub>2.5</sub> levels.<sup>27</sup> These studies provide evidence that the fine particles, as measured by PM<sub>2.5</sub>, may be more strongly associated with mortality effects from long-term particulate matter exposures than are coarse compounds.

A follow-up study of the American Cancer Society cohort confirmed and extended the findings in the initial study. The researchers estimated that, on average, a 10 µg/m<sup>3</sup> increase in fine particulates was associated with an approximately 4 percent increase in total mortality, a 6 percent increase in cardiopulmonary mortality, and an 8 percent increase risk of lung cancer mortality.<sup>28</sup> The magnitude of effects is larger in the long-term studies than in the short-term investigations, and therefore demonstrates variability and unreliability of a specific numeric indicator (as indicated above) for the general population. Furthermore, an analysis of the American Cancer Society Cohort from the Los Angeles area used a more detailed estimate of long-term PM<sub>2.5</sub> exposures and found that the risk of mortality was up to three times higher than estimated with the national cohort.<sup>29</sup> These findings indicate that long-term exposures may be more important in terms of overall health effects.

Despite data gaps, the extensive body of epidemiological studies has both qualitative and quantitative consistency suggestive of causality. A considerable body of evidence from these studies suggests that ambient particulate matter, alone or in combination with other coexisting pollutants, is associated with significant increases in mortality and morbidity in a community.

In summary, the scientific literature indicates that an increased risk of mortality and morbidity is associated with particulate matter at ambient levels. The evidence for particulate matter effects is mostly derived from population studies with supportive evidence from clinical and animal studies. Although most of the effects are attributable to particulate matter, co-pollutant effects cannot be ruled out on the basis of existing studies. The difficulty of separating the effects may be due to the fact that particulate levels co-vary with other combustion source pollutants. That is, the particle measurements serve as an index of overall exposure to combustion-related pollution, and some component(s) of combustion pollution other than particles might be at least partly responsible for the observed health effects. In addition, limitations of applying the results of a singular study to determine a specific project's health effects are described above, as well as subsequent discussion (see "Relating Adverse Air Quality Impacts and Health Effects" on page 27). Therefore, at this time, there is no specific numeric indicator that can reliably indicate specific health effects from particulate matter.

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<sup>27</sup> Laden F, Schwartz J, Speizer FE, Dockery DW. *Reduction in Fine Particulate Air Pollution and Mortality*. 2006. *Am J Respir Crit Care Med*, 173:667-672.

<sup>28</sup> Pope III CA, Burnett RT, Thun MJ, Calle E, Krewski D, Kazuhiko I, Thurston G. *Lung Cancer, Cardiopulmonary Mortality, and Long-Term Exposure to Fine Particulate Air Pollution*. 2002. *JAMA*, 287:1132-1141.

<sup>29</sup> Jerrett M, Burnett RT, Ma R, Pope CA III, Krewski D, Newbold KB, Thurston G, Shi Y, Finkelstein N, Calle EE, Thun MJ. *Spatial Analysis of Air Pollution and Mortality in Los Angeles*. 2005. *Epidemiology*, 15(6):727-736.

## Carbon Monoxide (CO)

Carbon monoxide is primarily emitted from combustion processes and motor vehicles due to incomplete combustion of fuel. Elevated concentrations of CO weaken the heart's contractions and lower the amount of oxygen carried by the blood. It is especially dangerous for people with chronic heart disease. Inhalation of CO can cause nausea, dizziness, and headaches at moderate concentrations and can be fatal at high concentrations.

Individuals with a deficient blood supply to the heart are the most susceptible to the adverse effects of CO exposure. The effects observed include earlier onset of chest pain with exercise, and electrocardiograph changes indicative of worsening oxygen supply delivery to the heart. Inhaled CO has no known direct toxic effect on the lungs, but exerts its effect on tissues by interfering with oxygen transport, by competing with oxygen to combine with hemoglobin present in the blood to form carboxyhemoglobin (COHb). Hence, people with conditions requiring an increased oxygen supply can be adversely affected by exposure to CO. Individuals most at risk include patients with diseases involving heart and blood vessels, fetuses, and patients with chronic hypoxemia (oxygen deficiency), such as is seen at high altitudes. Reductions in birth weight and impaired neurobehavioral development have been observed in animals chronically exposed to CO resulting in COHb levels similar to those observed in smokers. Recent studies have found increased risks for adverse birth outcomes with exposure to elevated CO levels, including preterm births and heart abnormalities. The U.S. EPA concluded in their most recent review that the evidence linking long-term CO exposures with reproductive health outcomes was suggestive of a causal relationship<sup>30</sup>.

## Nitrogen Dioxide (NO<sub>2</sub>)

NO<sub>2</sub> is a byproduct of fuel combustion and major sources include power plants, large industrial facilities, and motor vehicles. NO<sub>2</sub> is a gaseous air pollutant that serves as an indicator of gaseous oxides of nitrogen, such as nitric oxide (NO) and other related compounds (NO<sub>x</sub>). NO<sub>2</sub> absorbs blue light and results in a brownish-red cast to the atmosphere and reduced visibility. NO<sub>2</sub> also contributes to the formation of PM<sub>10</sub>. Nitrogen oxides irritate the nose and throat, and increase one's susceptibility to respiratory infections, especially in people with asthma. NO<sub>x</sub> is also a precursor to the formation of ozone.

The adverse effects of ambient nitrogen dioxide air pollution exposure on health were reviewed in the 2008 U.S. EPA Integrated Science Assessment for Oxides of Nitrogen—Health Criteria<sup>31</sup>, and more recently in the

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<sup>30</sup> U.S. EPA. *Integrated Science Assessment for Carbon Monoxide (Final Report)*. 2010. <https://cfpub.epa.gov/ncea/risk/recorddisplay.cfm?deid=218686>. Accessed August 2019.

<sup>31</sup> U.S. EPA. *Integrated Science Assessment for Oxides of Nitrogen—Health Criteria (Final Report)*. 2008. <http://cfpub.epa.gov/ncea/isa/recorddisplay.cfm?deid=194645>. Accessed August 2019.

2016 U.S. EPA Integrated Science Assessment for Oxides of Nitrogen—Health Criteria.<sup>32</sup> The 2016 U.S. EPA review noted the respiratory effects of NO<sub>2</sub>, and evidence suggestive of effects on cardiovascular health, mortality and cancer.

Experimental studies have found that NO<sub>2</sub> exposures increase responsiveness of airways, pulmonary inflammation, and oxidative stress, and can lead to the development of allergic responses. These biological responses provide evidence of a plausible mechanism for NO<sub>2</sub> to cause asthma. Additionally, results from controlled exposure studies of asthmatics demonstrate an increase in the tendency of airways to contract in response to a chemical stimulus (airway responsiveness) or after inhaled allergens. Animal studies also provide evidence that NO<sub>2</sub> exposures have negative effects on the immune system, and therefore increase the host's susceptibility to respiratory infections. Epidemiological studies showing associations between NO<sub>2</sub> levels and hospital admissions for respiratory infections support such a link, although the studies examining respiratory infections in children are less consistent.

The Children's Health Study in Southern California found associations of NO<sub>2</sub> with respiratory symptoms in asthmatics.<sup>33</sup> Particles and NO<sub>2</sub> were correlated, and it was determined that NO<sub>2</sub> plays a stronger role. Ambient levels of NO<sub>2</sub> were also associated with a decrease in lung function growth in a group of children followed for eight years. In addition to NO<sub>2</sub>, the decreased growth was also associated with particulate matter and airborne acids. The study authors postulated that these may be a measure of a package of pollutants from traffic sources.

Results from controlled exposure studies of asthmatics demonstrated an increase in the tendency of airways to contract in response to a chemical stimulus (bronchial reactivity). Effects were observed with an exposure to 0.3 parts per million (ppm) NO<sub>2</sub> for a period ranging from 30 minutes to 3 hours. A similar response is reported in some studies with healthy subjects at higher levels of exposure (1.5 - 2.0 ppm). Mixed results have been reported when people with chronic obstructive lung disease are exposed to low levels of NO<sub>2</sub>.

## Toxic Air Contaminants

In addition to criteria pollutants, a number of TACs have the potential to impact human health, including diesel particulate matter (DPM), a pollutant associated with heavy equipment and truck traffic. TACs refer to a diverse group of "non-criteria" air pollutants that can affect human health, but have not had ambient air quality standards established for them. This is not because they are fundamentally different from the pollutants

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<sup>32</sup> U.S. EPA. *Integrated Science Assessment for Oxides of Nitrogen—Health Criteria (Final Report)*. 2016. <https://cfpub.epa.gov/ncea/isa/recordisplay.cfm?deid=310879>. Accessed August 2019.

<sup>33</sup> McConnell R, Berhane K, Gilliland F, London SJ, Islam T, Gauderman WJ, Avol E, Margolis HG, Peters JM. *Asthma in exercising children exposed to ozone: a cohort study*. 2002. *Lancet*, 359:386-91.

discussed above, but because their effects tend to be local rather than regional. TACs are classified as carcinogenic and non-carcinogenic, where carcinogenic TACs can cause cancer and non-carcinogenic TAC can cause acute and chronic impacts to different target organ systems (e.g., eyes, respiratory, reproductive, developmental, nervous, and cardiovascular).

DPM, which is emitted in the exhaust from diesel engines, was listed by the state as a TAC in 1998. DPM has historically been used as a surrogate measure of exposure for all diesel exhaust emissions. DPM consists of fine particles (fine particles have a diameter less than 2.5 micrometer ( $\mu\text{m}$ )), including a subgroup of ultrafine particles (ultrafine particles have a diameter less than 0.1  $\mu\text{m}$ ). Collectively, these particles have a large surface area which makes them an excellent medium for absorbing organics. The visible emissions in diesel exhaust include carbon particles or “soot.” Diesel exhaust also contains a variety of harmful gases and cancer-causing substances.

Exposure to DPM may be a health hazard, particularly to children whose lungs are still developing and the elderly who may have other serious health problems. DPM levels and resultant potential health effects may be higher in close proximity to heavily traveled roadways with substantial truck traffic or near industrial facilities. According to CARB, DPM exposure may lead to the following adverse health effects: (1) aggravated asthma; (2) chronic bronchitis; (3) increased respiratory and cardiovascular hospitalizations; (4) decreased lung function in children; (5) lung cancer; and (6) premature deaths for people with heart or lung disease.<sup>34 35</sup> OEHHA’s HARP model and Air Toxics Hot Spots Program Guidance Manual (Guidance Manual) for the Preparation of Health Risk Assessments includes an ability to link certain TACs with metrics for cancer-rates or non-cancer effects on certain organ groups.

## RELATING ADVERSE AIR QUALITY IMPACTS AND HEALTH EFFECTS

The feasibility of determining a connection between air pollutant emissions and human health is different for a site-specific project, such as for a development project or local area plan, than it is for a larger regional scale analysis of an area-wide project, such as an analysis for a regulation change for the entire Air Coast Basin. As discussed below, directly correlating a single project’s emissions in a typical City EIR to quantifiable human

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<sup>34</sup> CARB, *Diesel Exhaust and Health*, [www.arb.ca.gov/research/diesel/diesel-health.htm](http://www.arb.ca.gov/research/diesel/diesel-health.htm), Accessed August 2019.

<sup>35</sup> CARB, *Fact Sheet: Diesel Particulate Matter Health Risk Assessment Study for the West Oakland Community: Preliminary Summary of Results*, March 2008.

health consequences is currently not scientifically feasible, as it is not possible to conduct such an analysis that would provide reliable or meaningful results. As further discussed below, it is also infeasible to correlate regional emissions from local area-wide projects or plans identified in City EIRs to quantified human health consequences in any reliable or meaningful way, for many of the same reasons, and with additional challenges associated with separating and anticipating reasonably foreseeable emissions from other sources.

It should also be noted that in April 2019, the Sacramento Metropolitan Air Quality Management District (SMAQMD) published an Interim Recommendation on implementing the Friant Ranch decision in the review and analysis of proposed projects under CEQA in Sacramento County (Attachment 4). The SMAQMD is to date the only California air district to formally release, as guidance, an Interim Recommendation (April 2019) for lead agencies and practitioners preparing CEQA documents for projects within Sacramento County to comply with the Friant Ranch decision. Consistent with the expert opinions submitted to the Court in Friant Ranch by the San Joaquin Valley Air Pollution Control District (SJVAPCD) (Attachment 3) and SCAQMD (Attachment 2), the SMAQMD guidance confirms the absence of an acceptable or reliable quantitative methodology that would correlate the expected criteria air pollutant emissions of projects to the likely health consequences to people of project-generated criteria air pollutant emissions. The SMAQMD guidance explains that while it is in the process of developing a methodology to assess these impacts, lead agencies should follow the Friant Court's advice to explain in meaningful detail why this analysis is not yet feasible.

The following information is therefore provided to explain that for most projects and local level plans analyzed in City EIRs, it is currently not scientifically feasible to provide a reliable quantitative analysis directly correlating a project's significant pollutant emissions and human health.

## Existing Models and Tools

As previously described, a number of existing models and tools exist for quantifying both project emissions and pollutant concentrations. Certain federal and state public health standards for air quality are set in terms of acceptable regional concentration levels of pollutants. The SCAQMD demonstrates attainment of these concentration standards, in part, by setting CEQA thresholds for amounts of construction and operational emissions produced by individual projects or plans. In compliance with CEQA and the identified thresholds, City EIRs for individual development projects and local-level plans disclose and analyze project *emissions* for criteria pollutants and pollutant concentrations for TACs. For CEQA purposes, *concentrations* of criteria pollutants are typically not calculated. While it may be possible to utilize a project's emission data to determine concentration amounts, this would hinge the analysis on an additive range of assumptions and uncertainties, thus contributing to a higher margin of error. In addition, an accurate model of the data would also require a complex set of input data which may not be readily available or would otherwise contribute further to the

unreliability of the results. Furthermore, additional limitations exist for utilizing both regional and local models for this purpose. As such, modeling these concentrations of criteria pollutants utilizing existing tools would result in unreliable data, as discussed in further detail below.

### *Modeling Concentrations v. Emissions*

In order to relate a project's emissions to human health effects, it would first be necessary to model the air pollutant concentrations resulting from a project. As discussed above, studies which link health effects with exposure to pollutants are primarily based on the ultimate ambient or regional concentrations of pollutants. This is especially true for secondary pollutants such as ozone and PM. The lack of correlation between the direct *quantity* of precursor pollutants and the *concentration* of ozone or secondary PM formed is important because it is not necessarily the *quantity* of precursor pollutants (such as NO<sub>x</sub>, SO<sub>2</sub>, VOCs, etc.) that causes human health effects; rather, it is the *concentration* of resulting ozone and secondary PM that causes these effects. Indeed, the ambient air quality standards for ozone, which are statutorily required to be set by USEPA (at levels that are requisite to protect the public health with a margin of safety) and by CARB (at levels that are requisite to protect the health of the most sensitive groups) are established as concentrations of ozone and not as quantity (i.e., tonnages) of ozone precursor pollutants.<sup>36 37</sup> Furthermore, since the ambient air quality standards are focused on achieving a particular concentration region-wide, the regional models and health impact analysis tools (i.e., BenMAP-CE, CAMx, CMAQ) and plans for attaining the ambient air quality standards are also regional in nature. However, as further described below (pages 31-32), these regional models are not useful for analysis of the health impacts of specific projects on any given geographic location.

### *Complexities of Modeling Concentrations*

In requiring a health risk type analysis for criteria air pollutants, it is important to understand how criteria pollutants are formed, dispersed, and regulated. As an example, ground level ozone (smog) is not directly emitted into the air, but is instead formed when precursor pollutants such as NO<sub>x</sub> and VOC are emitted into the atmosphere and undergo complex chemical reactions in the process of sunlight.<sup>38</sup> Once formed, ozone can be transported long distances by wind.<sup>39</sup> Due to the complexity of ozone formation, a specific tonnage amount of NO<sub>x</sub>

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<sup>36</sup> U.S. EPA, *Table of Ozone National Ambient Air Quality Standards*, <https://www.epa.gov/ground-level-ozone-pollution/table-historical-ozone-national-ambient-air-quality-standards-naaqs>. Accessed August 2019.

<sup>37</sup> CARB, *California Ambient Air Quality Standards*, <https://ww2.arb.ca.gov/resources/california-ambient-air-quality-standards>. Accessed August 2019.

<sup>38</sup> SJVAPCD, *Application for Leave to File Amicus Curiae Brief of SJVAPCD in Support of Defendant and Respondent, County of Fresno and Real Party in Interest and Respondent, Friant Ranch, L.P.*, April 13, 2015. Page 4. Included as Attachment 2 of this memorandum.

<sup>39</sup> U.S. EPA, *Ground-level Ozone: Basic Information*, [www.epa.gov/airquality/ozonepollution/basic.html](http://www.epa.gov/airquality/ozonepollution/basic.html). Accessed August 2019.



or VOCs emitted in a particular area does not equate to a particular concentration of ozone in that area.<sup>40</sup> In fact, even rural areas that have relatively low emissions of NO<sub>x</sub> or VOCs can have high ozone concentrations simply due to wind transport and other meteorological conditions such as temperature inversion and high pressure systems. Conversely, areas that have substantially more NO<sub>x</sub> and VOC emissions could experience lower concentrations of ozone simply because sea breezes disperse the emissions.<sup>41</sup>

For those projects where regional construction and operational emissions exceed the SCAQMD's recommended daily significance thresholds, this does not mean that one can determine with accuracy the concentration of ozone that will be created at or near the Project Site on a particular day or month of the year, or the specific human health effects that may occur. Meteorology, the presence of sunlight, geographical distribution of emissions, and other complex photochemical factors all combine to determine the ultimate concentrations and locations of ozone. This is especially true for the typical development project where most of the criteria pollutant emissions derive not from a single "point source," but from area wide sources (consumer products, paint, etc.) or mobile sources (cars and trucks) driving to, from and around the Project Site.

As another example, particulate matter can be divided into two categories: directly emitted PM and secondary PM. While directly emitted PM can have a localized impact, the tonnage emitted does not always equate to a specific local PM concentration because it can be transported long distances by wind.<sup>42</sup> Secondary PM, like ozone, is formed via complex chemical reactions in the atmosphere between precursor chemicals such as sulfur dioxide and NO<sub>x</sub>. Due to the complexity of secondary PM formation, the tonnage of PM-forming precursor emissions in an area does not necessarily result in an equivalent concentration of secondary PM in that area.

Furthermore, for modeling to produce reliable results, it is necessary to have data regarding the sources and types of toxic air contaminants, location of emission points, velocity of emissions, the meteorology and topography of the area, and the location of receptors (worker and residence).<sup>43</sup> Not all of these specific details or factors may be known at the time that a project or plan is undergoing CEQA review. For example, it may not be

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<sup>40</sup> SJVAPCD, *Application for Leave to File Amicus Curiae Brief of SJVAPCD in Support of Defendant and Respondent, County of Fresno and Real Party in Interest and Respondent, Friant Ranch, L.P.*, April 13, 2015. Page 4. Included as Attachment 2 of this memorandum.

<sup>41</sup> SJVAPCD, *2007 Ozone Plan, Executive Summary*. Page ES-6. [www.valleyair.org/Air\\_Quality\\_Plans/AQ\\_Final\\_Adopted\\_Ozone2007.htm](http://www.valleyair.org/Air_Quality_Plans/AQ_Final_Adopted_Ozone2007.htm). Accessed August 2019.

<sup>42</sup> U.S. EPA, *Particulate Matter: Basic Information*, [www.epa.gov/airquality/particulatepollution/basic.html](http://www.epa.gov/airquality/particulatepollution/basic.html). Accessed August 2019.

<sup>43</sup> SCAQMD, *Application of the SCAQMD for Leave to File Brief of Amicus Curiae in Support of Neither Party and Brief of Amicus Curiae*, April 6, 2015. Pages 9, 10. Included as Attachment 2 of this memorandum.

feasible to perform a health risk assessment for airborne toxics that will be emitted by a generic industrial building that was built on "speculation" (i.e., without knowing the future tenant(s)).<sup>44</sup>

### *Purposes and Limitations of Regional Models*

As described above, local, state, and federal standards are set with the purpose of attaining ambient air quality standards within the region for the protection of public health. In part to meet these ambient standards, the SCAQMD has set numeric thresholds for land-use projects to determine significant air quality impacts. These thresholds are based on regional project emissions, which refer to the actual *quantity* of pollutants generated by the project, and are measured in pounds per day. These pollutant sources (e.g., onsite natural gas usage and offsite vehicular exhaust across the regional roadway network) can be estimated, measured, and quantified. However, once a project's emissions enter the environment, these emissions are subject to a number of complex factors and variables, including chemical changes, dispersal, and weather variation, and ultimately combine with other existing conditions to result in the regional ambient air quality and concentrations of pollutants.

The SCAQMD (and other regional air quality management and air pollution control districts) conducts regional-scale modeling in order to evaluate regional-scale air pollution, including modeling for the AQMP, modeling attainment demonstrations, and the Multiple Air Toxics Exposure Study (MATES) studies. This involves a regional scale photochemical model such as CAMx and CMAQ, which have a modeling domain on the order of hundreds of kilometers. Mobile source emissions are estimated using EMFAC and SCAG RTP/SCS VMT data and traffic data obtained from Caltrans for the entire basin. The effort, resources, and availability of necessary input data required to perform this type of analysis is complex and extensive, and is infeasible for smaller projects.

### *Unreliability of Using Regional Models at Smaller Scale*

As noted in the Brief of Amicus Curiae by the South Coast Air Quality Management District in the Friant Ranch case (Attachment 2), SCAQMD has among the most sophisticated air quality modeling and health impact evaluation capability of any of the air districts in the State, and thus it is uniquely situated to express an opinion on how lead agencies should correlate air quality impacts with specific health outcomes.<sup>45</sup> The computer models (e.g., CMAQ modeling platform)<sup>46</sup> used to simulate and predict an attainment date for ozone are based on regional inventories of precursor pollutants and meteorology within an air basin. At a very basic level, based on

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<sup>44</sup> SCAQMD, *Application of the SCAQMD for Leave to File Brief of Amicus Curiae in Support of Neither Party and Brief of Amicus Curiae*, April 6, 2015. Page 10. Included as Attachment 2 of this memorandum.

<sup>45</sup> SCAQMD, *Application of the SCAQMD for Leave to File Brief of Amicus Curiae in Support of Neither Party and Brief of Amicus Curiae*, April 6, 2015. Pages 9, 10. Included as Attachment 2 of this memorandum.

<sup>46</sup> The SCAQMD 2016 AQMP ozone attainment demonstration was developed using the U.S. EPA recommended CMAQ (version 5.0.2) modeling platform with SAPRC07 chemistry, and the Weather Research and Forecasting Model (WRF) (version 3.6) meteorological fields.

gross assumptions appropriate for regional-scale analyses, the models simulate future ozone levels based on predicted changes in precursor emissions basin wide. It should be noted that it takes a large amount of additional precursor emissions to cause a modeled increase in ambient ozone levels over an entire region.<sup>47</sup> The computer models are not designed to determine whether the emissions generated by an individual development project, or even emissions from most relatively small-scale areas such as specific plan areas or community plan areas, will affect the date that the air basin attains the ambient air quality standards. Instead, the models help inform regional planning strategies based on the extent all of the emission-generating sources within the air basin must be controlled in order to reach attainment.<sup>48</sup>

In addition, this modeling is inappropriate for project-level or local plan-level analysis, as small changes in modeling results could be well within the normal gross margin of error of the CMAQ model performance. For example, SCAQMD states the expected margin of error for comparing CMAQ modeled daily maximum air pollutant concentrations to monitored concentrations is 20 percent.<sup>49</sup> However, even the expected 20 percent margin of error is exceeded in regional scale analyses. SCAQMD found that when maximum values equal or exceed 60 ppb, the normalized gross maximum error ranges from 15.7 to 19.8 percent for the coastal region, 11.5 to 22.3 percent for the San Fernando region, 12.1 to 25.2 for the foothills region, 14.7 to 18.2 for the urban source region, 12.5 to 20.9 percent for the urban receptor region, and 9.6 to 16.8 for the Coachella Valley.<sup>50</sup> The quarterly error statistic for PM<sub>2.5</sub> ranges from 54 percent to 95.7 percent for the coastal region, 30.1 to 60.6 percent for the San Fernando region, 30.7 to 81.6 percent for the foothills region, 41.1 to 81.6 percent for the urban source region, 23.5 to 53 percent for the urban receptor region, and 38 to 59.6 percent for the Coachella Valley region.<sup>51</sup>

Therefore, using these regional models at the project-level or local plan-level scale would not yield reliable results, as the emissions from a localized project would be small in comparison, falling within margins of error of the regional models. Therefore, results regarding project or local plan-level emissions would not be meaningful or statistically significant.

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<sup>47</sup> SCAQMD, *Final 2012 AQMP*, February 2013, [https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2012-air-quality-management-plan/final-2012-aqmp-\(february-2013\)/appendix-v-final-2012.pdf](https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2012-air-quality-management-plan/final-2012-aqmp-(february-2013)/appendix-v-final-2012.pdf), Appendix V, pages v-4-2, v-7-4, v-7-24. Accessed August 2019.

<sup>48</sup> SJVAPCD, *Application for Leave to File Amicus Curiae Brief of SJVAPCD in Support of Defendant and Respondent, County of Fresno and Real Party in Interest and Respondent, Friant Ranch, L.P.*, April 13, 2015. Page 6-7. Included as Attachment 2 of this memorandum.

<sup>49</sup> SCAQMD, *Final 2016 AQMP*, 2017. Appendix V-2-3. <https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/appendix-v.pdf?sfvrsn=10>. Accessed August 2019.

<sup>50</sup> SCAQMD, *Final 2016 AQMP*, 2017. Appendix V, Tables V-5-3 through V-5-8. <https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/appendix-v.pdf?sfvrsn=10>. Accessed August 2019.

<sup>51</sup> *Ibid.* Table V-6-3

### *Purposes and Limitations of Localized Models*

Certain models (such as AERMOD and HARP) may be able to direct certain pollutant concentrations locally with reliable accuracy. However, these are used to prepare project-level health risk assessments (HRAs) for pollutants like DPM and other TACs, and do not address secondary pollutants such as ozone. Regarding the use of other potential localized models such as CALINE-4, the City's CEQA documents currently provide CO hotspot analyses where appropriate. However, per guidance from the SCAQMD and Caltrans, further modeling of other pollutants would be inappropriate using CALINE-4.<sup>52</sup> In addition, while these models are able to estimate concentrations for certain pollutants, no methods have been demonstrated to reliably and meaningfully connect these pollutant concentrations to specific health effects.

If an attempt were made to potentially utilize a localized model to determine a project's resulting pollutant concentrations, most likely an analysis would follow a methodology similar to how localized air quality analyses are currently performed for CEQA (e.g., freeway HRAs). For example, a project's vehicle emissions could be determined using CalEEMod or EMFAC. The project-related traffic emissions within a ¼ mile of the project site could then be combined with project-related emissions from on-site sources and analyzed for receptors in the vicinity using AERMOD on a microscale basis. The analysis could load traffic emissions along the roadway network consistent with the traffic study. This approach could be used for CO, NO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>; however, this would not address other pollutants, these models include additional limitations, and a number of uncertainties would be included in the modeling assumptions. Some of the limitations and uncertainties of this approach would include:

*Pollutant Emissions.* CalEEMod generates total daily regional-wide emissions from a project. These emissions account for different trip lengths based on the trip generation (residential vs. commercial, commute vs. delivery, etc.) and trip type (primary, diverted, pass-by). It would be speculative to assume on a regional basis where these emissions were to occur. It would also be speculative to assume which types of vehicles would use specific roadways (e.g., diesel delivery trips associated with a Project would likely use different routes than commuter trips).

*Spatial and temporal data.* It would be speculative to assume when and where vehicles would be travelling. AERMOD assumes steady state conditions and may not be able to account for variations in meteorology as well as seasonal variations.

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<sup>52</sup> Caltrans, *Project-Level Air Quality Analysis*. <https://dot.ca.gov/programs/environmental-analysis/air-quality/project-level-air-quality-analysis>. Accessed August 2019.

*Ambient data.* Health impacts are highly dependent on ambient air quality levels. While data at ambient monitoring stations may be available, nearby localized sources (e.g., stationary emissions and major roadways) are not known and are not accounted for.

*Chemistry.* AERMOD is unable to process chemical reactions related to secondary PM and ozone formation.

The combination and compounding of the uncertainties from each component and step of the modeling analysis, particularly in the context of the very small increment of change in regional ambient air pollutant concentrations that a single project would be predicted to cause, would likely result in large margins of error for the overall modeled outcomes. That is, even if a model reports a certain outcome, the actual outcome may be in a relatively broad range surrounding the reported outcome. When these uncertainties are factored into the modeling analysis, the results would not be able to provide a meaningful estimate of health impacts. Furthermore, as described in further detail below, even if reliable pollutant concentration data were available, the concentration information could not be reliably and directly related to a health impact at this time.

## Metrics for Determining Health Effects

### *CEQA Thresholds and Relationship to Specific Health Effects*

As one of the many paths that the SCAQMD has established to lead the district towards achieving acceptable levels of pollutant concentrations region-wide, the agency has set CEQA thresholds of significance for project emission quantities. These SCAQMD thresholds are related to basin-wide emissions, are cumulative in nature, and do not indicate thresholds for project-specific concentrations related to particular health effects. Therefore, it should be noted that the SCAQMD regional significance thresholds are not direct indicators of specific health effects.

For example, with respect to ozone precursor emissions, the SCAQMD has set its operational CEQA significance threshold for NO<sub>x</sub> and VOC at 10 tons per year (expressed as 55 pounds per day). This is based on the federal Clean Air Act, which defines a major stationary source for extreme ozone nonattainment areas such as the SCAQMD as one emitting 10 tons per year. Under the federal Clean Air Act, such sources are subject to enhanced control requirements, thus SCAQMD determined that 55 pounds (less than .03 tons) per day was an appropriate threshold for making a CEQA significance finding and requiring feasible mitigation. For context, according to the most recent EPA-approved SCAQMD basin-wide emissions inventory, the VOC inventory for emissions is 500 tons per day and for NO<sub>x</sub> emissions is 522 tons per day for the baseline year of 2012.<sup>53</sup> The

<sup>53</sup> SCAQMD, *Final 2016 AQMP*, 2017. Figure 3-3. <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/final-2016-aqmp>. Accessed August 2019.

threshold quantity of 55 pounds per day therefore represents a very small percentage (approximately .005 percent) of total daily basin-wide emissions. It should also be noted that from a scientific standpoint, it takes a large amount of additional precursor emissions to cause a statistically significant increase in ambient ozone levels over an entire region. In the case of ozone, the SCAQMD's 2012 AQMP showed that reducing baseline year 2008 NO<sub>x</sub> by 432 tons per day and reducing VOC by 187 tons per day would only reduce ozone levels at the SCAQMD's monitor site with the highest levels by 9 parts per billion.<sup>54</sup> Therefore, the SCAQMD has stated that "...a project source that emits 10 tons/year of NO<sub>x</sub> or VOC is small enough that its regional impact on ambient ozone levels may not be detected in the regional air quality models that are currently used to determine ozone levels. Thus, in this case it would not be feasible to directly correlate project emissions of VOC or NO<sub>x</sub> with specific health impacts from ozone."<sup>55</sup> Therefore, the SCAQMD has stated that the agency does not currently know of a way to accurately quantify ozone-related health impacts caused by VOC or NO<sub>x</sub> emissions from relatively small projects<sup>56</sup>, although this type of analysis may potentially be feasible for regional-scaled projects with very high emissions of ozone precursors.

### *Lack of Established Metrics by Expert Agencies*

Furthermore, both the SCAQMD and SJVAPCD have indicated that it is not feasible to quantify project-level health effects from ozone and secondary-formed pollutants based on available modeling techniques.<sup>57 58</sup> The SCAQMD Brief also cites the author of the CARB methodology, which reported that a PM<sub>2.5</sub> methodology is not suited for small projects and may yield unreliable results.<sup>59</sup> In addition, it would be infeasible to determine, with any degree of reliability, the impact on attainment of the ambient air quality standards and the number of nonattainment days that may result when a Project exceeds regional thresholds, and any findings would be speculative. As discussed above, the currently available regional models and health impact analysis tools (i.e., BenMAP-CE, CAMx, CMAQ) are equipped to model the impact of all emission sources in an air basin to demonstrate attainment.

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<sup>54</sup> SCAQMD, *Final 2012 AQMP*, February 2013, [https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2012-air-quality-management-plan/final-2012-aqmp-\(february-2013\)/appendix-v-final-2012.pdf](https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2012-air-quality-management-plan/final-2012-aqmp-(february-2013)/appendix-v-final-2012.pdf), Appendix V, pages v-4-2, v-7-4, v-7-24. Accessed August 2019.

<sup>55</sup> SCAQMD, *Application of the SCAQMD for Leave to File Brief of Amicus Curiae in Support of Neither Party and Brief of Amicus Curiae*, April 6, 2015. Page 12. Included as Attachment 2 of this memorandum.

<sup>56</sup> SCAQMD, *Application of the SCAQMD for Leave to File Brief of Amicus Curiae in Support of Neither Party and Brief of Amicus Curiae*, April 6, 2015. Page 12. Included as Attachment 2 of this memorandum.

<sup>57</sup> SCAQMD, *Application of the SCAQMD for Leave to File Brief of Amicus Curiae in Support of Neither Party and Brief of Amicus Curiae*, April 6, 2015. Included as Attachment 2 of this memorandum.

<sup>58</sup> SJVAPCD, *Application for Leave to File Amicus Curiae Brief of SJVAPCD in Support of Defendant and Respondent, County of Fresno and Real Party in Interest and Respondent, Friant Ranch, L.P.*, April 13, 2015. Included as Attachment 2 of this memorandum.

<sup>59</sup> SCAQMD, *Application of the SCAQMD for Leave to File Brief of Amicus Curiae in Support of Neither Party and Brief of Amicus Curiae*, April 6, 2015. Page 14. Included as Attachment 2 of this memorandum.

Even if a metric could be calculated, it would not be reliable because the models attempt to evaluate the impact of all emission sources in an air basin on attainment and would likely not yield information with sufficient statistical certainty or a measurable increase in ozone concentrations sufficient to quantify health effects for an individual project. The SCAQMD Brief concludes, with respect to the Friant Ranch EIR, that although it may have been technically possible to plug the data into a methodology, the results would not have been reliable or meaningful.<sup>60</sup> No expert agency, including the SCAQMD and CARB, have approved a quantitative method to reliably and meaningfully translate mass emission estimates of criteria pollutants to specific health effects.

### *Limitations of Extrapolating Metrics from Health Impact Assessments*

Current HRA tools are able to provide some insight into potential health effects from project TACs and these tools have been specifically designed to evaluate how toxic emissions are released, how they disperse throughout an area, and the potential for those toxic pollutants to impact human health. However, these tools for TAC analysis do not address criteria pollutants and their related specific health effects, and also present their own limitations. HRAs typically include three separate components: an emissions inventory, dispersion modeling, and health risk calculations. OEHHA's HARP model and Air Toxics Hot Spots Program Guidance Manual (Guidance Manual) for the Preparation of Health Risk Assessments includes an ability to link certain air quality compounds with metrics for cancer-rates or non-cancer effects on certain organ groups.

The Guidance Manual identifies Response Exposure Levels (RELs) for various pollutants, which are concentration levels at (or below) which no adverse non-cancer health effects are anticipated for a specific exposure duration, usually specific to certain target organs. Exceeding the REL does not automatically indicate an adverse health impact, as the REL is not the threshold where population health effects would first be seen. However, increasing concentrations above the REL value increases, with an undefined probability, the likelihood that the health effect will occur.<sup>61</sup> These RELs are developed by OEHHA based on a highly technical and robust research process, including data gathering, modeling, determining appropriate parameters, making extrapolation adjustments, addressing variables and factors of uncertainty, consulting with expert agencies and the public, and undergoing scientific review. As such, the HARP model has become an accepted industry standard in evaluating health impacts from TACs and providing reliable and meaningful analysis, although the limitations of this analysis is also disclosed in HRA documents.

It should also be noted that the process of assessing health risks and impacts itself includes a degree of uncertainty, dependent on the availability of data and the extent to which assumptions are relied upon in cases

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<sup>60</sup> SCAQMD, *Application of the SCAQMD for Leave to File Brief of Amicus Curiae in Support of Neither Party and Brief of Amicus Curiae*, April 6, 2015. Page 15. Included as Attachment 2 of this memorandum.

<sup>61</sup> OEHHA. *Air Toxics Hot Spots Program Guidance Manual*. February 2015. page 6-2.  
<https://oehha.ca.gov/media/downloads/crnrr/2015guidancemanual.pdf>. Accessed August 2019.

where the data are incomplete or unknown. In general, sources of uncertainty that may lead to an overestimation or an underestimation of the risk include: extrapolation of toxicity data in animals to humans, uncertainty in the estimation of the emissions, uncertainty in the air dispersion models, and uncertainty in the exposure estimates.<sup>62</sup> In addition to uncertainty, there is a natural range or variability in measured parameters defining the exposure scenario, including variation among the human population. Risk estimates generated by an HRA should therefore not be interpreted as the *expected* rates of disease in the exposed population but rather as *estimates* of potential for disease, based on current knowledge and a number of assumptions.<sup>63</sup>

For criteria pollutants, OEHHA guidance for health risk has only been identified for short-term one-hour peak exposures (acute inhalation) for CO, H<sub>2</sub>S, NO<sub>2</sub>, Ozone, SO<sub>x</sub>, and SO<sub>2</sub>, and otherwise the guidance lacks cancer potency factors or RELs for any longer-term exposure of any criteria pollutant. Even so, the HARP model which utilizes these factors or RELs is utilized for stationary sources and does analyze health impacts from mobile source emissions. As emissions from projects analyzed in City local-plan or project EIRs are usually heavily comprised of mobile source emissions, utilization of the HARP model for this analysis would not be useful to provide meaningful information regarding health impacts. Therefore, existing models utilizing these RELs for acute inhalation are not able to provide sufficient information about direct health impacts or probability of specific adverse health effects from criteria pollutants for City EIR projects.

In general, health impact assessments also use Concentration-Response (C-R) functions. C-R functions determine the relationship between the change in pollutant concentration and change in health impacts (baseline vs. project). It should be noted that not all C-R functions are linear. Using AERMOD or Cal3QHC/CALINE4, there is no reliable method to estimate baseline conditions at a project's buildout. While ambient monitoring data is available throughout the air basin, this does not account for nearby related projects or other stationary sources.

There are also many C-R functions based on pollutants, specific health impacts, age, race, pollutant uptake rates, sensitivity to specific pollutants, and other criteria. When calculating health impacts, the appropriate C-R functions would need to be selected. Due to the level of speculation required to make these assumptions, this could expose a project to potential challenges, as experts may debate about the correct C-R function used for analyses. As discussed above, while a microscale model could be used for some aspects of projects to address localized roadway impacts, linking specific health effect to concentrations would be speculative under CEQA due to the uncertainties in such an analysis, as discussed above.

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<sup>62</sup> Ibid. page I-5.

<sup>63</sup> Ibid. page I-6.



### *Limitations on Extrapolating Metrics from Existing Health Studies*

In the absence of an adopted metric by an expert agency identifying emission or concentration levels with a particular health effect, there is information on this topic available within a body of health research and series of independent studies, as generally described in previous sections and in Attachment 1 (SCAQMD Final 2016 AQMP, Appendix I: Health Effects). However, utilizing this body of work can also be problematic if attempting to make reliable or meaningful conclusions relating project emissions to specific health impacts. For example, many of the health studies rely on specific population subgroups or provide limited sample sizes, and therefore have conclusions which would not apply to health effects on the general public. In addition, within the universe of these studies, there exists a broad range of findings and at times, inconsistent conclusions between studies. Research in this field is also subject to other limitations, including the scientific infeasibility of parsing out specific pollutants from other variables with an acceptable degree of certainty, which results in weak causal relationships between particular pollutants and specific health effects. Therefore, it would be speculative to use a limited study to relate concentrations of any specific pollutant to specific health impacts for a number of reasons. While pollutant increments could be compared to relevant data identified from a specific study, it is not recommended to base findings of a specific health-related impact on any single limited study. Therefore, even if a project's pollutant concentrations could be determined with an acceptable degree of accuracy, existing available information could still only provide a range or general idea of health impacts to the population at large.

## Health Effects from Regional Emissions Generated by Local Plans or Projects are Likely Nominal

The SCAQMD also conducted pollutant modeling for proposed Rule 1315 in which the CEQA analysis accounted for essentially all of the increases in emissions due to new or modified sources in the District between 2010 and 2030, or an approximate increase of 6,620 pounds per day of NO<sub>x</sub> and 89,947 pounds per day of VOC. At this regional scale, the SCAQMD was able to correlate this very large emissions increase to expected health outcomes from ozone and particulate matter. The results of the analysis showed that this increase of regional pollutant emissions would contribute to only a small increase in the air basin wide ozone concentrations in 2030 of 2.6 ppb and less than 1 ppb of NO<sub>2</sub>.<sup>64</sup>

Comparatively, a typical City project emits much lower amounts of pollutant emissions. For City projects that generate emissions exceeding SCAQMD's operational significance thresholds, (e.g., peak daily regional

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<sup>64</sup> SCAQMD, *Final Program Environmental Assessment for Re-Adoption of Proposed Rule 1315*, 2011. Page 1-11.  
<https://www.aqmd.gov/home/research/documents-reports/lead-agency-scaqmd-projects/aqmd-projects---year-2011/re-adoption-of-proposed-rule-1315>.

emissions of 150 pounds per day of PM<sub>10</sub> and 55 pounds per day of NO<sub>x</sub>, VOC or PM<sub>2.5</sub>), these projects also typically represent relatively small amounts of pollutant emissions, with regional impacts which may not even be detected by current regional air quality models. For example, when comparing the Rule 1315 analysis to a large City project, such as the Olympia Project (a mixed-use development with 1.8 million square feet of floor area on a 3.3-acre site), Olympia's regional operational emissions would result in approximately 2 pounds of VOC and 12 pounds of NO<sub>x</sub> over the SCAQMD's significance thresholds, or approximately 0.06 and 1.0 percent of the emissions analyzed by SCAQMD related to Rule 1315, respectively.

As a further comparison to a local plan or community plan-level City project, such as the Hollywood Community Plan Update (which anticipates an approximate 27 percent increase for both housing/population and employment within a 22 square mile regional center within the City), the plan's regional operational emissions would result in an increase of 472 lbs. per day in VOCs and a decrease of 2,763 lbs. per day of NO<sub>x</sub>, or approximately 0.5 percent of the VOC emissions analyzed by SCAQMD related to Rule 1315. NO<sub>x</sub> emissions would decrease under the Community Plan and would therefore not exceed any significant thresholds. This demonstrates that most City projects studied in project and plan-level EIRs would result in emissions at much lower rates than those necessary to be able to correlate project emissions with specific health effects. Furthermore, construction and operational emissions are typically more regional (e.g., emitted by mobile sources distributed across region's roadway network) and different than the identified stationary sources as modeled in SCAQMD's analysis of Rule 1315, which would add to the difficulties of modeling project-related emissions.

Running the regional-scale photochemical grid model used for predicting ozone attainment with the emissions from any individual project or even a relatively small-scale area project would not yield reliable information regarding a measurable increase in ozone concentrations sufficient to accurately quantify ozone-related health effects. Any modeled increase in ozone concentrations would not be useful for a meaningful analysis, as the increase would be so comparatively small that it would be well within the margin of error of such models. Similarly, it would also not be feasible to identify a Project's impact on the days of nonattainment per year. Based on this information, a general description of the adverse health effects resulting from the pollutants at issue is all that can be feasibly provided at this time.

## CONCLUSION

Federal and state ambient air quality standards are designed to prevent the harmful effects of air pollution. These standards are continually updated based on evolving research, including research which relates air quality impacts with health effects. At the regional level, plans such as the SCAQMD's AQMP and SCAG's RTP/SCS work to ensure that the South Coast Air Basin reaches and maintains attainment with these federal and state standards. Locally, the City's EIRs evaluate a plan or project's consistency with applicable policies identified in the SCAQMD's AQMP and SCAG's RTP/SCS. City EIRs also identify regulatory compliance measures which work to limit risk and exposure to TACs. In addition, in evaluating air quality impacts on a plan- or project-level, the City's EIRs utilize thresholds guidance and air quality models established by the SCAQMD, which have been developed to implement these regional plans for attainment and protection of public health. Improvements to air quality in the region attest to the efficacy of these plans and local implementation practices.

For local plans or projects that exceed any identified SCAQMD air quality threshold, City EIR documents typically identify and disclose generalized health effects of certain air pollutants but are currently unable to establish a reliable connection between any local plan or project and a particular health effect. In addition, no expert agency has yet to approve a quantitative method to reliably and meaningfully do so. A number of factors contribute to this uncertainty, including the regional scope of air quality monitoring and planning, technological limitations for modeling at a local plan- or project-level, and the intrinsically complex nature between air pollutants and health effects in conjunction with local environmental variables. Therefore, at the time, it is infeasible for City EIRs to directly link a plan's or project's significant air quality impacts with a specific health effect. However, as air quality modeling and research on health effects advances over time, the City will continue to seek the latest guidance from local air quality agencies and experts and refine its approach based on future information as it becomes available.

**SCAQMD FINAL 2016 AQMP -**

**APPENDIX I**

**HEALTH EFFECTS**

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT



# Appendix I

## Health Effects

### 2016 AIR QUALITY MANAGEMENT PLAN



March 2017

**FINAL 2016 AQMP  
APPENDIX I**

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**HEALTH EFFECTS**

**MARCH 2017**

**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT  
GOVERNING BOARD**

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Speaker of the Assembly Appointee

Vice Chairman: BEN BENOIT  
Mayor Pro Tem, Wildomar  
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## **ATTACHMENT**

**Publications from Health Related Research Projects Funded by SCAQMD**

## INTRODUCTION

This document presents a summary of scientific findings on the health effects of ambient air pollutants. The California Health and Safety Code Section 40471(b) requires that the South Coast Air Quality Management District (SCAQMD) prepare a report on the health impacts of particulate matter in the South Coast Air Basin (SCAB) in conjunction with the preparation of the Air Quality Management Plan (AQMP) revisions. This document, which was prepared to satisfy that requirement, also includes sections discussing the health effects of the other major pollutants. The intention of this document is to provide a brief summary of the conclusions of scientific reviews conducted by U.S. EPA and other scientific agencies, with some additional information from more recently published studies.

In addition to the air pollutant health effects summaries, there is an Attachment to this Appendix, which is a list of publications that have resulted from health-related research projects sponsored by SCAQMD over the past several years. Some of these studies are discussed in this Appendix, as appropriate, although there are many other studies referenced here. The studies funded by SCAQMD also help inform the SCAQMD's work in characterizing the air pollution and its effects in our local region and the influences of sources of air pollution in the Basin.

While information on ambient air quality statistics, attainment status, spatial distribution of air pollutants, environmental justice, socioeconomic impacts, control strategies, and cost-effectiveness are important issues that may relate to health effects, these issues are not the focus of this Appendix, and are instead discussed in detail in other chapters and appendices of the AQMP, or in the AQMP Socioeconomic Report.

## HEALTH EFFECTS OF AIR POLLUTION

Ambient air pollution is a major public health concern. Excess deaths and increases in illnesses associated with high air pollution levels have been documented in several episodes as early as 1930 in Meuse Valley, Belgium; 1948 in Donora, Pennsylvania; and 1952 in London. Although levels of pollutants that occurred during these acute episodes are now unlikely in the United States, ambient air pollution continues to be linked to increases in illness and other health effects (morbidity) and increases in death rates (mortality).

Adverse health outcomes linked to air pollution include cardiovascular effects, premature mortality, respiratory effects, cancer, reproductive effects, neurological effects, and other health outcomes. The evidence linking these effects to air pollutants is derived from population-based observational and field studies (epidemiological), toxicological studies, as well as controlled laboratory studies involving human subjects and animals. There have been an increasing number of studies focusing on the mechanisms (that is, on learning how specific organs, cell types, and biomarkers are involved in

the human body's response to air pollution). Yet the underlying biological pathways for these effects are not always clearly understood.

Although individuals inhale pollutants as a mixture under ambient conditions, the regulatory framework and the control measures developed are pollutant-specific for six major outdoor pollutants covered under Sections 108 and 109 of the Clean Air Act. This is appropriate, in that different pollutants can differ in their sources, their times and places of occurrence, the kinds of health effects they may cause, and their overall levels of health risk. Different pollutants, from the same or different sources, oftentimes occur together. While the combined effects of multiple air pollutants that occur simultaneously may be important, the air quality standards address each criteria pollutant separately, and thus, this Appendix is divided into sections by pollutant. To meet the air quality standards, comprehensive plans are developed such as the Air Quality Management Plan (AQMP); and to minimize exposure to toxic air contaminants in the South Coast AQMD, a local air toxics control plan is also prepared. These plans examine multiple pollutants, cumulative impacts, and transport issues related to attaining healthful air quality. A brief overview of the effects observed and attributed to various air pollutants is presented in this Appendix. Because the SCAB exceeds the federal standards for ozone and PM<sub>2.5</sub>, this Appendix focuses more attention in the discussion of these two pollutants, since the health impacts within the SCAB are potentially greater for these two pollutants compared to the health impacts of the other criteria pollutants. For the other pollutants, a brief summary of the associated health effects is provided.

This summary is drawn substantially from reviews presented previously (South Coast Air Quality Management District 1996; South Coast Air Quality Management District 2003; South Coast Air Quality Management District 2007; South Coast Air Quality Management District 2013b), and from the most recent U.S. EPA Integrated Science Assessment (ISA) reviews for Ozone (U.S. EPA 2013b), Carbon Monoxide (U.S. EPA 2010), Particulate Matter (U.S. EPA 2009), Nitrogen Oxides (U.S. EPA 2016), Sulfur Dioxide (U.S. EPA 2008), and Lead (U.S. EPA 2013a). Additional reviews prepared by the California Air Resources Board and the California EPA Office of Environmental Health Hazard Assessment for Particulate Matter (California Air Resources Board and Office of Environmental Health Hazard Assessment 2002), for Ozone (California Air Resources Board and Office of Environmental Health Hazard Assessment 2005) and for Nitrogen Dioxide (California Air Resources Board and Office of Environmental Health Hazard Assessment 2007) were included in the summary. In addition, several large review articles on the health effects of air pollution also helped inform this Appendix (American Thoracic Society 1996a; Brunekreef et al. 2002). More detailed citations and discussions on air pollution health effects can be found in these references.<sup>1</sup> Additionally, a supplemental literature review of mortality and morbidity impacts of PM<sub>2.5</sub>, ozone, NO<sub>2</sub>, and SO<sub>2</sub> was conducted for the AQMP Socioeconomic Evaluation to identify more recent studies (Industrial Economics Inc. 2016b; Industrial Economics Inc. 2016a); this health effects summary also draws upon this literature review to discuss these more recent studies, particularly those published since the

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<sup>1</sup> Most of the studies referred to in this Appendix are cited in the above sources. Only specific selected references to provide examples of the types of health effects are cited in this summary.

most recent ISA's. This summary highlights studies that were conducted in the South Coast Air Basin or in Southern California, or alternatively, in California, if few studies from our local region are available on the specific topic. Studies conducted in Southern California give an important "local perspective" in understanding and evaluating the health effects of air pollution. However, studies conducted in other locations also provide critical information that is pertinent to advancing the scientific understanding of the health effects of air pollution, including effects on our local population. As such, this summary also discusses key studies that were conducted in other locations.

Over the decades of national reviews of outdoor air pollution and their health impacts, the U.S. EPA has developed a list of five criteria by which the strength and credibility of data can be judged. This five-tier weight-of-evidence approach provides an objective basis for assessing the breadth, specificity, and consistency of evidence concerning a particular health outcome. Table I-1 shows the five descriptors used by the U.S. EPA for assessing causality, using a weight-of-evidence approach. Within each section discussing a specific pollutant are tables showing summaries of the U.S. EPA conclusions regarding the causality of air pollution health effects, which are the conclusions of their scientific evaluation of the research studies they have reviewed. For the criteria pollutants, the discussion in this Appendix will focus only on those categories of health effects for which the U.S. EPA has determined there is a causal or likely causal relationship with the pollutant, while other health effects may be discussed briefly. In particular, because of the relatively long time gap since the latest U.S. EPA ISA for PM (in 2009), and because the SCAB currently exceeds the federal standards for PM<sub>2.5</sub>, some additional health endpoints that are emerging as areas of interest with regard to PM exposure are discussed briefly in this Appendix.

It is important to note that the U.S. EPA is tasked with assessing new and emerging air quality science, including health studies, as part of the process of setting the federal air quality standards. In other words, the U.S. EPA's role is to assess the causal relationships between the pollutants and the different types of health endpoints. It is SCAQMD's role to describe the public health impacts of poor air quality in our region, as well as to develop and implement an emission reduction strategy to attain the federal and state ambient air quality standards. Therefore, it is not the intention of this Appendix to assess whether there is or is not an effect of a specific air pollutant on any particular health endpoint, but rather to summarize the health effects and causal determinations as assessed by U.S. EPA and other scientific agencies, to discuss some recent studies published since the latest U.S. EPA reviews, to give some quantitative estimates of the health impacts of particulate matter air pollution in the South Coast Air Basin, and to present a "local perspective" by highlighting studies conducted in the South Coast Air Basin, Southern California, or California.

**TABLE I-1**

## U.S. EPA's Weight of Evidence Descriptions for Causal Determination of Health Effects

DETERMINATION	WEIGHT OF EVIDENCE
Causal Relationship	Evidence is sufficient to conclude that there is a causal relationship with relevant pollutant exposures. That is, the pollutant has been shown to result in health effects in studies in which chance, bias, and confounding could be ruled out with reasonable confidence. For example: (a) controlled human exposure studies that demonstrate consistent effects; or (b) observational studies that cannot be explained by plausible alternatives or are supported by other lines of evidence (e.g., animal studies or mode of action information). Evidence includes replicated and consistent high-quality studies by multiple investigators.
Likely To Be A Causal Relationship	Evidence is sufficient to conclude that a causal relationship is likely to exist with relevant pollutant exposures, but important uncertainties remain. That is, the pollutant has been shown to result in health effects in studies in which chance and bias can be ruled out with reasonable confidence but potential issues remain. For example: (a) observational studies show an association, but co-pollutant exposures are difficult to address and/or other lines of evidence (controlled human exposure, animal, or mode of action information) are limited or inconsistent; or (b) animal toxicological evidence from multiple studies from different laboratories that demonstrate effects, but limited or no human data are available. Evidence generally includes replicated and high-quality studies by multiple investigators.
Suggestive Of A Causal Relationship	Evidence is suggestive of a causal relationship with relevant pollutant exposures, but is limited because chance, bias, and confounding cannot be ruled out. For example, at least one high-quality epidemiologic study shows an association with a given health outcome but the results of other studies are inconsistent.
Inadequate To Infer A Causal Relationship	Evidence is inadequate to determine that a causal relationship exists with relevant pollutant exposures. The available studies are of insufficient quantity, quality, consistency or statistical power to permit a conclusion regarding the presence or absence of an effect.
Not Likely To Be A Causal Relationship	Evidence is suggestive of no causal relationship with relevant pollutant exposures. Several adequate studies, covering the full range of levels of exposure that human beings are known to encounter and considering susceptible populations, are mutually consistent in not showing an effect at any level of exposure.

(Adapted from U.S. EPA, 2009)

## OZONE

Ozone is a gaseous air pollutant that is a highly reactive compound and a strong oxidizing agent. When ozone comes into contact with the respiratory tract, it can react with tissues and cause damage in the airways. Ozone, or its reaction products, can penetrate into the gas exchange region of the deep lung. Both short-term and long-term exposures to ozone have been linked to respiratory effects. Ozone from man-made sources is formed by photochemical reactions when pollutants such as volatile organic compounds, nitrogen oxides, and carbon monoxide react with sunlight. The main sources of such ozone precursors are discussed in detail in the draft 2016 AQMP Chapter 3. Additionally, a discussion of the spatial distribution of ozone is provided in the draft 2016 AQMP Chapter 2.

In 1997, the U.S. EPA established the first federal standard for ozone averaged over 8 hours, at 0.08 ppm. In 2005, the California Air Resources Board (CARB) established standards of 0.09 ppm averaged over one hour and at 0.070 ppm averaged over eight hours. In 2008, the U.S. EPA lowered the federal standard for ozone to 0.075 ppm averaged over eight hours. On the basis of recent evaluations of ozone health effects, U.S. EPA's Clean Air Scientific Advisory Committee recommended in 2015 that the National Ambient Air Quality Standard (NAAQS) for ozone be reduced and recommended a range in which 0.070 ppm would be the upper limit. In 2015, the U.S. EPA concluded that the current national standard was not adequate to protect public health and lowered the 8-hour ozone standard to 0.070 ppm (U.S. EPA 2015b). While the federal standards must be attained within a specified time frame, the California standards do not have specific defined deadlines, but must be attained by the earliest practicable date.

The table below provides the overall U.S. EPA staff conclusions on the causality of short-term (i.e. hours, days, weeks) and long-term (i.e. months, years) ozone health effects for the health outcomes evaluated (U.S. EPA 2013b).

**TABLE I-2**

Summary of U.S. EPA's Causal Determinations for Health Effects of Ozone

<b>SHORT-TERM EXPOSURES</b>	
<b>Health Outcome</b>	<b>Causality Determination</b>
Respiratory Effects	Causal relationship
Cardiovascular Effects	Likely to be a causal relationship
Central Nervous System Effects	Suggestive of a causal relationship
Effects on Liver and Xenobiotic Metabolism	Inadequate to infer a causal relationship
Effects on Cutaneous and Ocular Tissues	Inadequate to infer a causal relationship
Mortality	Likely to be a causal relationship
<b>LONG-TERM EXPOSURES</b>	
<b>Health Outcome</b>	<b>Causality Determination</b>
Respiratory Effects	Likely to be a causal relationship
Cardiovascular Effects	Suggestive of a causal relationship
Reproductive and Developmental Effects	Suggestive of a causal relationship
Central Nervous System Effects	Suggestive of a causal relationship
Cancer	Inadequate to infer a causal relationship
Mortality	Suggestive of a causal relationship

(From U.S. EPA, 2013a Table 1-1)

## Short-Term Exposure Effects of Ozone

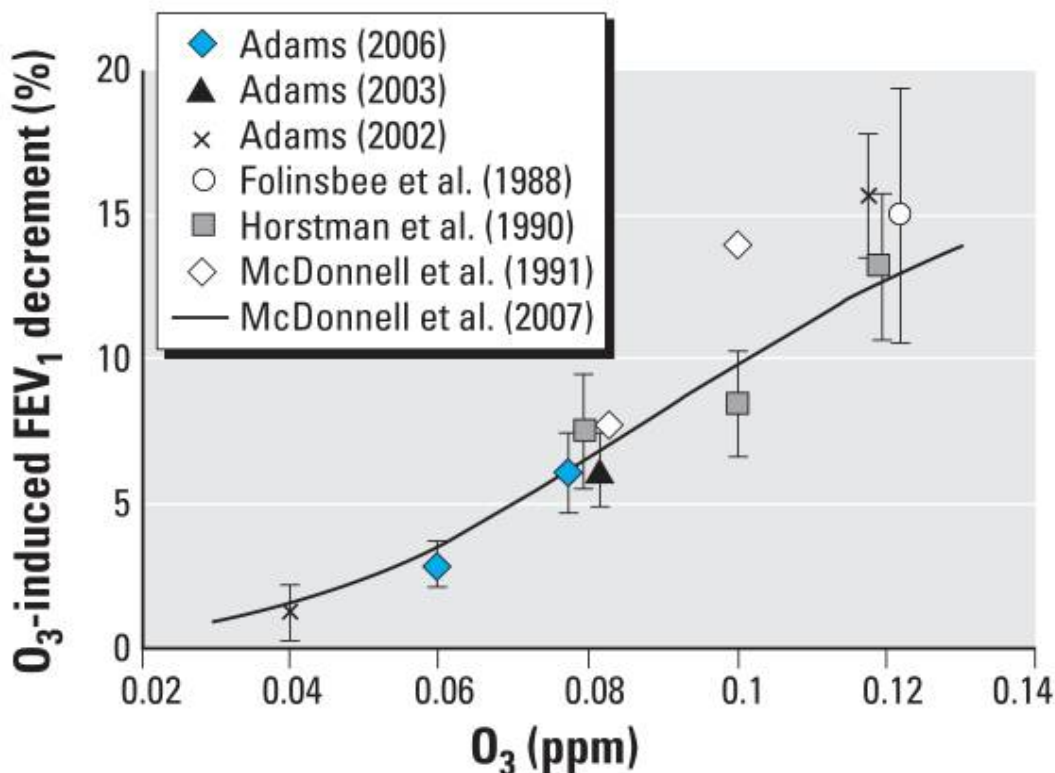
The adverse effects reported with short-term ozone exposure are greater with increased activity because activity increases the breathing rate, the depth of the breaths, and the volume of air reaching the lungs, resulting in an increased amount of ozone reaching deeper into the lungs. Children are considered to be a particularly vulnerable population to air pollution effects because their lungs are still growing, they typically spend more time outdoors, are generally more physically active, and have a higher ventilation rate relative to their body weight, compared to adults (U.S. EPA 2013b).

A number of adverse health effects associated with ambient ozone levels have been identified from laboratory and epidemiological studies (American Thoracic Society 1996b; U.S. EPA 2006; U.S. EPA 2013b). These include increased respiratory symptoms, damage to cells of the respiratory tract,

decrease in lung function, increased susceptibility to respiratory infection, an increased risk of hospitalization, and increased risk of mortality. For short-term ozone exposures, the U.S. EPA determined in the most recent ISA that the evidence supports a causal relationship for respiratory effects, and a likely causal relationship for cardiovascular effects and mortality.

In the laboratory, exposure of human subjects to low levels of ozone causes reversible decreases in lung function as assessed by various measures such as respiratory volumes, airway resistance and reactivity, irritative cough and chest discomfort. The results of several studies where human volunteers were exposed to ozone for 6.6 hours at levels between 0.04 and 0.12 ppm were summarized by Brown (Brown et al. 2008). As shown in Figure I-1, there is an increasing response on lung function with increasing exposure levels in moderately exercising subjects. A study published after the analysis by Brown et al. exposed healthy young adults for 6.6 hours under intermittent moderate exercise to each of the following: filtered air, and ozone at 0.06, 0.07, 0.08, and 0.087 ppm (Schelegle et al. 2009). The study found decreases in lung function (forced expiratory volume in 1 second, or FEV1) with each of the different levels of ozone exposure, although the decrease in lung function at 0.06 ppm was not statistically different from exposure to filtered air. Lung function (FEV1) decreases were approximately 5 percent, 7 percent, and 11 percent at ozone exposure levels of 0.07, 0.08, and 0.087 ppm. A more recent study (Kim et al. 2011) exposed young healthy adults to ozone in the range of 0.06 to 0.10 ppm for 6.6 hours while engaging in intermittent moderate exercise, and found that the study participants exhibited an approximately 2 percent reduction in lung function (FEV1) and an increase in pulmonary inflammation after exposure to ozone at the 0.06 ppm concentration.





**FIGURE I-1**

Comparison of mean ozone-induced decrements in lung function following 6.6 hours of ozone exposure. Error bars represent the standard error. McDonnell et al. (2007) was a summary of results from several studies, and is represented by the line in the graph. (From: (Brown et al. 2008))

Some changes in lung function (volume and airway resistance changes) observed after study participants were exposed to ozone only once exhibit attenuated responses or a reduction in magnitude of responses when exposures are repeated, although there were a range of individual human responses observed, including some non-responders (Linn et al. 1988). Although it has been argued that the observed shift in response is evidence of a probable development of tolerance, it appears that while functional changes may exhibit attenuation, biochemical and cellular changes which may be associated with episodic and chronic exposure effects may not exhibit an attenuation. That is, internal damage to the respiratory system may continue with repeated ozone exposures, even if externally observable effects (chest symptoms and reduced lung function) disappear. An additional argument against toleration is that after several days or weeks without ozone exposures, the responsiveness (in terms of lung function as well as symptoms) returns, which is evidence that any tolerance developed is relatively short-lived (U.S. EPA 2013b).

Laboratory studies have also compared the degree of lung function change seen in healthy individuals versus asthmatics and those with chronic obstructive pulmonary disease (COPD). In several

laboratory studies of individuals with COPD, the percent decreases in lung function from short-term ozone exposures  $\leq 0.30$  ppm among patients with COPD generally did not differ from the lung function decrements experienced by healthy patients (Linn et al. 1982; Solic et al. 1982; Linn et al. 1983; Kehrl et al. 1985). That finding, however, may not accurately reflect the true impact of exposure on these respiration-compromised individuals. Since the respiration-compromised group may have lower lung function to begin with, the same total percent change in lung function may represent a substantially greater relative adverse effect overall. Other studies have found that subjects with asthma are more sensitive to the short-term effects of ozone in terms of lung function and inflammatory response, as evidenced by measuring changes in lung function, increased hospitalizations, and emergency room visits for respiratory conditions (U.S. EPA 2013b). This evidence supports the hypothesis that asthmatics are a particularly sensitive population to the health effects of ozone.

In laboratory studies of animals, cellular and biochemical changes associated with respiratory tract inflammation have also been consistently found in the airway lining after low-level exposure to ozone. These changes include an increase in specific cell types and in the concentration of biochemical mediators of inflammation and injury such as Interleukin-1, Interleukin-6, Interleukin-8, Tumor Necrosis Factor  $\alpha$  (TNF- $\alpha$ ), and fibronectin (Van Bree et al. 2002; Johnston et al. 2007; U.S. EPA 2013b).

In addition to controlled laboratory conditions, epidemiological studies of individuals exercising outdoors, including children attending summer camp, have shown associations of reduced lung function with ozone exposure. There were wide ranges in responses among individuals. U.S. EPA's 2013 ISA indicated that most studies found reductions in lung function (FEV<sub>1</sub>) in the range of approximately <1 to 2 percent when standardized to an increase of 0.04 ppm for a 1-hour maximum, an increase of 0.03 ppm for an 8-hour maximum, and an increase of 0.02 ppm for a 24-hour average (U.S. EPA 2013b). Somewhat greater decrements in lung function (4.9 to 7.3 percent) were found in children with asthma who had respiratory infections or were using corticosteroid medication.

Epidemiologic studies have found that increases in short-term ozone levels are associated with impacts on children's respiratory health, including increases in respiratory symptoms in children with asthma, and increased numbers of absences from school. Studies conducted in various cities in the U.S. and in other countries have reported increased respiratory symptoms among children with asthma, including wheeze, cough, difficulty breathing, and chest symptoms/tightness (U.S. EPA 2013b). The Children's Health Study, conducted by researchers at the University of Southern California, followed for several years a cohort of children that live in 12 communities in Southern California with differing levels of air pollution. A publication from this study reported that school absences in fourth graders for respiratory illnesses were positively associated with short-term increases in ambient ozone levels. An increase of 20 ppb (0.02 ppm) ozone was associated with a 63 percent increase in illness-related absence rates and an 83 percent increase in respiratory illnesses (Gilliland et al. 2001). A small panel study of Hispanic children with asthma living in the Huntington Park neighborhood of Los Angeles, California reported that a 10.8 ppb increase in ozone averaged

over 8 hours nearly doubled the odds of having asthma symptoms that interfered with daily activities (Delfino et al. 2003). Despite these studies, and some others linking ozone exposures with school absences, the U.S. EPA concluded that only limited evidence is currently available linking these ozone exposures to respiratory-related school absences (U.S. EPA 2013b).

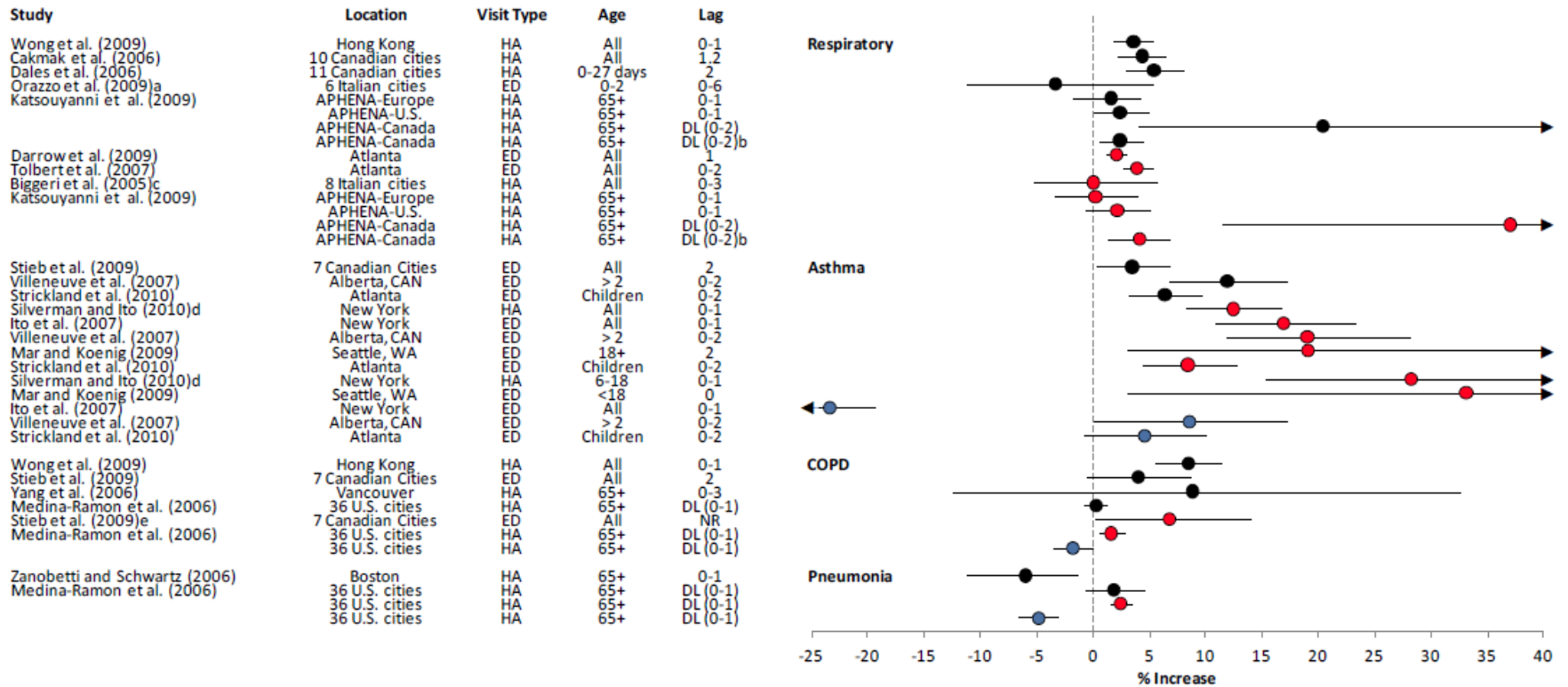
Numerous studies have found associations of short-term ozone levels and hospital admissions and emergency department admissions for respiratory conditions, and the U.S. EPA concluded in the latest ISA that the most recent epidemiological studies conducted in both single cities and multiple cities continue to provide evidence supporting a causal relationship between short-term ozone exposures and respiratory effects (U.S. EPA 2013b). The studies generally found stronger associations for asthma and COPD in the warm season or in the summer months, compared to the cold season, and also provided evidence that children are at greatest risk of ozone-related respiratory health effects. Several of these studies reviewed in the ISA had average ozone concentrations well below 60 ppb averaged over 8 hours and still reported associations with respiratory outcomes. One study of asthma emergency department visits reported ozone effects at concentrations as low as 30 ppb (Strickland et al. 2010). Figure I-2 presents examples of studies regarding all-year and seasonal analysis of ozone exposure and hospital admissions or emergency department visits. This figure illustrates the associations found between ambient ozone exposure and key respiratory outcomes (asthma, COPD and pneumonia), and shows the stronger effects with summertime ozone exposures. Recently, a study in California reported that short-term ozone exposures were associated with emergency department visits for asthma, acute respiratory infections, pneumonia, COPD, and upper respiratory tract infections, with more consistent associations during the warm season (Malig et al. 2016). This California study provides additional supporting evidence for ozone-related respiratory effects.

The potential cardiovascular effects of short-term ozone exposure have been studied in toxicological, human exposure, and epidemiological studies. Controlled human exposure studies have found that ozone exposures produce changes in heart function (as measured by heart rate variability) and increases in biomarkers in the blood for systemic inflammation and oxidative stress. The limited number of toxicological studies on this topic provide evidence of cardiovascular effects. The effects observed include increased heart rate variability, arrhythmias, vascular disease, and inflammation and oxidative stress leading to atherosclerosis, which can lead to tissue damage due to ischemia and reperfusion (i.e. having the blood supply cut off and then restored to the tissues) (U.S. EPA 2013b). The controlled human exposure and toxicological studies provide evidence of cardiovascular effects of ozone, and some plausible mechanisms for these effects. Epidemiological studies, including some recent multi-city studies show relatively consistent associations between short-term ozone exposures and cardiovascular mortality (these studies are discussed further below). However, epidemiological studies do not provide consistent evidence of cardiovascular morbidity with short-term ozone exposures. Studies conducted in the Los Angeles area or in California also do not provide consistent evidence of short-term ozone effects on cardiovascular morbidity. A study of elderly non-smokers in the Los Angeles area with a history of heart disease found no associations between ozone exposure and blood pressure nor ST-segment depression, a measure of cardiac ischemia (Delfino et

al. 2010; Delfino et al. 2011). A Los Angeles-based study of cardiovascular hospital admissions did not find increased risk with ozone exposures (Linn et al. 2000). However, a biomarker study of students at UC Berkeley who spent their summer vacation in either the Los Angeles or San Francisco Bay Area found that ozone exposures over a period of 2 weeks or 1 month were associated with increases in a biomarker of lipid peroxidation, but no association was found for a biomarker of antioxidant capacity (Chen et al. 2007). Lipid peroxidation is an indicator of oxidative stress, which may be triggered by pulmonary inflammation caused by ozone exposure. Given the strong evidence of cardiovascular morbidity from experimental studies and the consistent positive associations reported in epidemiological studies of cardiovascular mortality, but the lack of consistent evidence from epidemiological studies of cardiovascular morbidity, the U.S. EPA determined that there is a likely causal relationship between short-term ozone exposures and cardiovascular effects (U.S. EPA 2013b).

For mortality effects, the U.S. EPA 2013 ISA concluded that there was a likely causal relationship for short-term ozone exposures. This determination is supported by numerous studies have found positive associations between short-term increases in ozone levels and excess risk of mortality from all non-accidental causes, cardiovascular causes, and respiratory causes (Bell et al. 2004; Bell et al. 2005; Huang et al. 2005; Ito et al. 2005; Levy et al. 2005; Bell et al. 2008; Zanobetti et al. 2008). Studies conducted across multiple cities in the U.S. Canada, Europe and Asia reported increased cardiovascular and respiratory mortality risks with increased short-term ozone exposures, and several studies additionally reported increased mortality risk for summer season ozone exposures (Katsouyanni et al. 2009; Samoli et al. 2009; Stafoggia et al. 2010; Wong et al. 2010). Some studies have also demonstrated that these associations persist even when other variables including season and levels of particulate matter are accounted for, indicating that ozone mortality effects may be independent of other pollutants, although there is some variability across studies with regard to the sensitivity of the ozone associations to adjustment for PM (Bell et al. 2004; Huang et al. 2005; Katsouyanni et al. 2009; Stafoggia et al. 2010). With regard to respiratory effects, the substantial evidence supporting a causal relationship between short-term ozone exposures and respiratory morbidity provides strong support for the recent evidence from epidemiological studies linking such exposures to respiratory mortality. For cardiovascular effects, while there is strong evidence linking cardiovascular mortality with short-term ozone exposures, the epidemiological studies of non-fatal outcomes do not provide consistent evidence for a coherent mechanism linking ozone exposures to cardiovascular mortality (U.S. EPA 2013b).

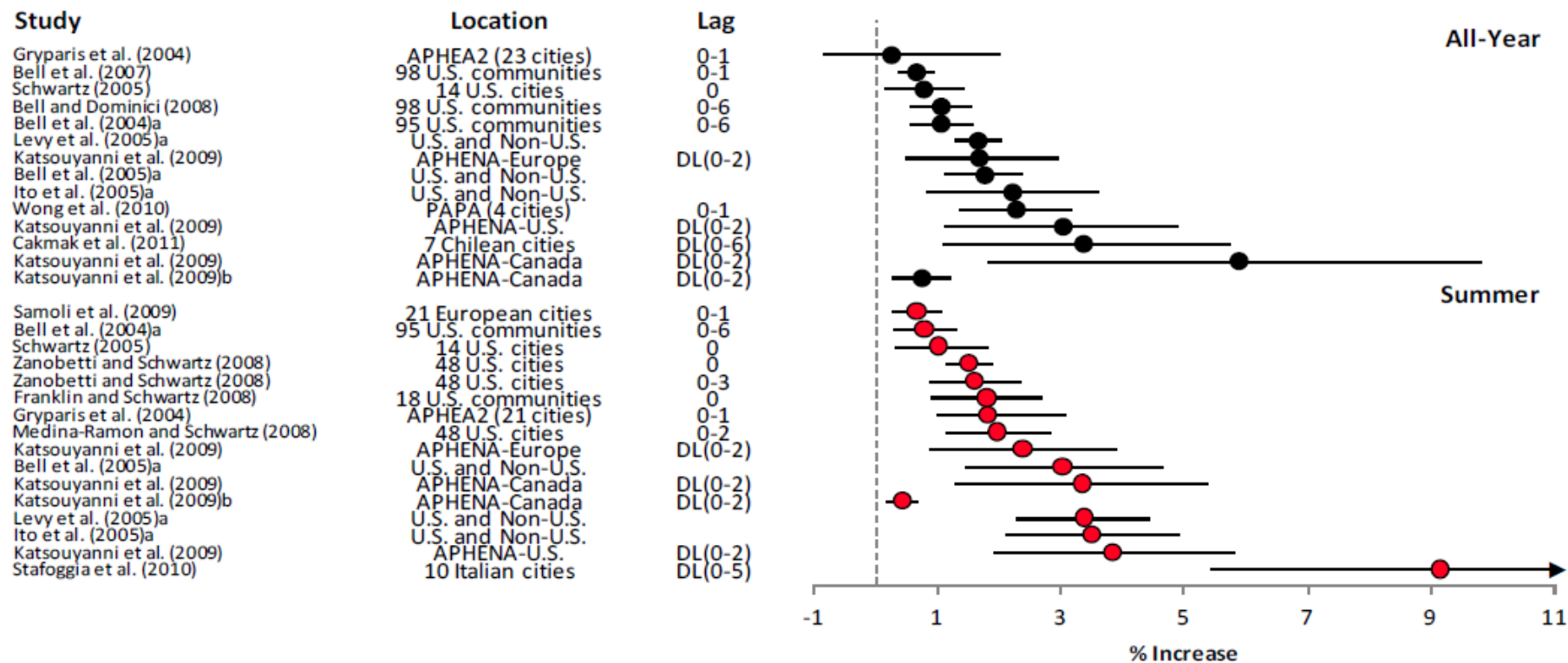
Examples of studies showing the relative change in mortality risks for all-year and summer-only analyses are shown in Figure I-3.



Note: Effect estimates are for a 20 ppb increase in 24-hour; 30 ppb increase in 8-hour max; and 40 ppb increase in 1-hour max O<sub>3</sub> concentrations. HA=hospital admission; ED=emergency department. Black=All-year analysis; Red=Summer only analysis; Blue=Winter only analysis. (From (U.S. EPA 2013b) Figure 6-19)

**FIGURE I-2**

Change in respiratory-related hospital admission and emergency department visits in studies that presented all-year and/or seasonal results.



Note: Effect estimates are for a 40 ppb increase in 1-hr max, 30 ppb increase in 8-hr max, and 20 ppb increase in 24-hr average O<sub>3</sub> concentrations. (From (U.S. EPA 2013b) Figure 6-27)

**FIGURE I-3**

Summary of mortality risk estimates for short-term O<sub>3</sub> exposure and all-cause (nonaccidental) mortality.

## Long-Term Exposure Effects of Ozone

The U.S. EPA 2013 ISA for Ozone concluded that there was a likely causal relationship between long-term ozone exposure and respiratory effects (U.S. EPA 2013b). Evidence supporting this determination comes from epidemiological and toxicological studies, particularly studies of asthma and related symptoms, asthma-related hospital admissions, lung function, lung inflammation and oxidative stress. Other health effects of long-term ozone exposure were determined to have “suggestive” or “inadequate” evidence of causality, although the few studies of respiratory mortality provide support to the respiratory health effects of ozone.

The Adventist Health and Smog Study (AHSMOG) and Children’s Health Study cohorts are two large long-term studies conducted in California that examined several aspects of long-term ozone effects in adults and children, respectively. Several of these studies focused on asthma development and exacerbation. The AHSMOG study included adult, non-smoking, non-Hispanic white Seventh Day Adventists living in California. The 10-year follow-up AHSMOG study reported that a 10 ppb increase in annual mean ozone exposures increased the risk of asthma development in males by three-fold (relative risk 3.12, 95 percent confidence interval: 1.16, 5.85), but no effect was seen among females (relative risk 0.94, 95 percent confidence interval: 0.65, 1.34) (Greer et al. 1993). The 15-year follow-up AHSMOG study used an ozone metric focusing on 8-hour average exposures, and reported that a 10 ppb increase was associated with a 30 percent increased risk of developing asthma in males (relative risk 1.31, 95 percent confidence interval: 1.01, 1.71), and these effects persisted even after accounting for other pollutants (McDonnell et al. 1999). The latter study also found no effect in females, although this may reflect a greater potential for misclassification of air pollution exposure in females compared to males, due to different time-activity patterns resulting in greater time spent outdoors among males (U.S. EPA 2013b). In the Children’s Health Study, among children living in 12 Southern California communities with high ozone concentrations, the relative risk of developing asthma in children playing three or more sports was found to be over three times higher than in children playing no sports (McConnell et al. 2002). The high ozone communities had a 4-year mean daytime ozone concentration of 59.6 ppb, compared to 40.0 ppb for the low-ozone communities. These findings indicate that new cases of asthma in children may be associated with performance of heavy exercise in communities with high levels of ozone. While it has long been known that air pollution can exacerbate symptoms in individuals with preexisting respiratory disease, this is among the first studies that indicate ozone exposure may contribute to asthma onset. However, three more recent Southern California studies did not find an association between ozone exposures and childhood asthma incidence, but did report increased risks of asthma onset with higher exposures to particulate matter or NO<sub>2</sub> (Islam et al. 2007; McConnell et al. 2010; Nishimura et al. 2013). These studies did not examine whether genetic factors may have played a role in making some people more susceptible than others to the respiratory effects of ozone exposure. Some analyses from the Children’s Health Study identified specific genetic variants that, when combined with ambient ozone exposure, either increase or decrease the risk of developing asthma (Islam et al. 2008; Islam et al. 2009; Salam et al. 2009). These genetic variants are involved with antioxidant and/or anti-

inflammatory pathways, and are likely involved in key elements of asthma development (U.S. EPA 2013b).

Other studies examined the impact of long-term ozone exposures and respiratory symptoms, particularly among asthmatics. Studies have linked long-term ozone exposures to increased risk of having poorly-controlled asthma, increased asthma symptoms, and respiratory-related school absences (Gilliland et al. 2001; Akinbami et al. 2010; Jacquemin et al. 2012). An analysis from the CHS found no association between long-term ozone exposures and chronic lower respiratory tract symptoms, and another found an increased risk of bronchitic symptoms within a community, although the association was reduced when accounting for other pollutants (McConnell et al. 1999; McConnell et al. 2003). However, two studies from the CHS demonstrated gene-environment interactions for genes that are involved in inflammation or antioxidant pathways. One study found that asthmatic children with a particular genetic variant that reduces expression of the cytokine TNF- $\alpha$  (as part of an inflammatory response) had reduced risk of bronchitic symptoms for children in low-ozone communities, but not for children in high-ozone communities (Lee et al. 2009). A second study found that a particular genetic variant reduced the risk of respiratory-related school absences among children living in communities with high levels of ozone (defined in this study as being above the median value of 46.9 ppb) (Wenten et al. 2009).

Results of epidemiologic studies of hospital admissions and emergency department visits support the relationship between ozone exposure and respiratory effects. In a 2007 study conducted in Southern California, an increased risk of having poorly-controlled asthma was associated with living in areas above the 90<sup>th</sup> percentile ozone level (28.7 ppb, annual average) among men and elderly individuals (Meng et al. 2007). A study in the South Coast Air Basin found that ozone was associated with increased hospital discharges for asthma among children (Moore et al. 2008). Another study in the South Coast Air Basin looked at infants hospitalized for bronchiolitis. This study found a reduced risk of infant bronchiolitis hospitalization with increased ozone exposure, although there was no association for ozone when accounting for the effect of PM<sub>2.5</sub>, which was positively associated with this respiratory outcome (Karr et al. 2007). A study of people with asthma was conducted in the San Joaquin Valley of California, and found that a 10 ppb increase in ozone exposures averaged over one year increased the odds of asthma-related hospital admissions and emergency department visits by approximately 50 percent, and the odds of asthma symptoms among adults by about 40 percent (Meng et al. 2010). Studies conducted in other locations have also reported increases in asthma hospitalizations (U.S. EPA 2013b).

Some animal studies show results that indicate possible chronic effects including functional and structural changes of the lung. However, morphological, developmental, and immunological differences make it difficult to apply these results to humans experiencing ambient exposures. These changes observed in airway responsiveness provide support for the long-term effects of ozone in asthma development or exacerbation (U.S. EPA 2013b). However, epidemiologic studies examining long-term ozone exposures and lung function deficits have reported mixed results. For example, an analysis of the first CHS cohort found that PM<sub>2.5</sub> and NO<sub>2</sub> exposures were associated with decreased



lung function, but did not find an association for ozone (Gauderman et al. 2004). An autopsy study involving Los Angeles County residents who died between ages 14 and 25 years due to violent death, although conducted many years ago when pollutant levels were higher than currently measured, provided supportive evidence of lung tissue damage (structural changes), which the authors suggested were attributable to air pollution (Sherwin 1991), although many uncertainties remain about the extent to which air pollution explains the findings.

Unlike short-term ozone exposures, there is limited evidence linking long-term ozone exposures with mortality. A large study based on the American Cancer Society Cancer Prevention Study II (CPS-II) cohort included 96 metropolitan statistical areas in the U.S., and reported that a 10 ppb increase in daily maximum 1-hour ozone concentrations averaged between April and September (warm season) was associated with a relative risk of 1.040 (95 percent confidence interval: 1.010, 1.067) for respiratory deaths, but no association with cardiovascular deaths (Jerrett et al. 2009). A U.S. study of Medicare enrollees reported increased risk of mortality with higher ozone exposures averaged over the warm season, among patients who had previously been hospitalized for congestive heart failure, myocardial infarction, COPD and diabetes (Zanobetti et al. 2011). A recent large-scale study found increased risk of all-cause, cardiovascular, and respiratory mortality with long-term ozone exposures, even after accounting for the effects of PM<sub>2.5</sub> and NO<sub>2</sub>, as well as other behavioral and demographic factors, including smoking (Turner et al. 2016). Other studies have found temperature to be an important potential risk factor for mortality, and may confound or modify the associations between air pollution exposure and mortality (Basu et al. 2002; Cheng et al. 2008). The Turner 2016 study examined the role of temperature, and found that the associations between ozone and mortality differed based on average daily maximum temperatures (Turner et al. 2016). While the U.S. EPA determination in the latest ISA was that the evidence was suggestive of long-term ozone exposure causing mortality, the studies of respiratory mortality support the evidence for the respiratory effects of ozone exposure, for which U.S. EPA has concluded there is a causal relationship.

For non-respiratory health endpoints, the U.S. EPA causal determinations were “suggestive of a causal relationship” (for cardiovascular, reproductive and developmental, central nervous system and mortality effects) or “inadequate to infer a causal relationship” (for cancer). Some studies conducted in California have examined reproductive or developmental effects, including birth defects, low birth weight or birth weight reductions, stillbirth and autism (Ritz et al. 2002; Ritz et al. 2007; Morello-Frosch et al. 2010; Becerra et al. 2013; Mobasher et al. 2013; Trasande et al. 2013; Laurent et al. 2014; Green et al. 2015; Symanski et al. 2016). Other recent studies have examined cardiovascular effects (Koken et al. 2003; Ensor et al. 2013; Rodopoulou et al. 2014). While many of these studies have reported associations with ambient ozone levels, the most recent U.S. EPA determination in 2013 was that the evidence was suggestive of a causal determination, but did not yet rise to a higher level.

## Sensitive Populations for Ozone-Related Health Effects

A number of population groups are potentially at increased risk for ozone exposure effects. In the most recent ISA for ozone in 2013, the U.S. EPA has identified several populations as having adequate evidence for increased risk from ozone exposures. These include children, older adults, outdoor workers, and individuals with asthma, certain variations in genes related to oxidative metabolism or inflammation, or reduced intake of certain nutrients such as Vitamins C and E (Kreit et al. 1989; Horstman et al. 1995; Sienna-Monge et al. 2004; Romieu et al. 2012; U.S. EPA 2013b; Bell et al. 2014). There is suggestive evidence for other potential factors, such as a person's sex, socioeconomic status, and obesity (U.S. EPA 2013b). Some other factors that could affect sensitivity to ozone have also been studied; however, there was inadequate evidence to conclude whether these were risk factors for ozone sensitivity. The table below summarizes the evidence for factors affecting sensitivity to ozone from the 2013 ISA for ozone.

**TABLE I-3**

Summary of Evidence for Potential Increased Susceptibility to Ozone-Related Health Effects

Evidence Classification	Potential At Risk Factor
Adequate evidence	Genetic factors Asthma Children Older adults Diet Outdoor worker
Suggestive evidence	Sex SES Obesity
Inadequate evidence	Influenza/infection COPD Cardiovascular disease Diabetes Hyperthyroidism Race/ethnicity Smoking Air conditioning use
Evidence of no effect	--

From (U.S. EPA 2013b) Table 8-6

As previously mentioned, one group that has been recognized as being particularly sensitive to the effects of ozone is young children with asthma, because their lungs are still developing, their potential for increased exposure due to time spent exercising outdoors, and their high ventilation rates relative to body weight (U.S. EPA 2013b). Some factors that may contribute to the increased sensitivity among people with asthma include having an altered innate immune function and factors that decrease their antioxidant defenses (Alexis et al. 2014). Ozone creates secondary oxidation products that are electrophilic, and certain genetic factors influence a person's ability to metabolize

these electrophiles, which can affect respiratory function (U.S. EPA 2013b). Asthma exacerbations are more prevalent and severe in young boys than in girls, but the evidence on whether boys are more susceptible than girls to the effects of air pollution on asthma symptoms is not consistent (Guarnieri et al. 2014).

## Summary – Ozone Health Effects

In summary, outdoor ozone exposures have been associated with a range of negative human health effects. The strongest evidence for negative health impacts are on the respiratory system, and are measured by decreased lung function performance and increased cell injury. In addition, the 2013 ISA also concluded that there was a likely causal relationship between short-term ozone exposures and cardiovascular effects (such as changes in heart function, and increased systemic inflammation and oxidative stress) as well as respiratory mortality. Although the specific mechanisms of action for ozone effects on the various health endpoints have not been fully identified, there is evidence of the important roles of oxidation of key enzymes and proteins, inflammatory responses, changes in immune response, and modification and activation of neural reflex pathways (U.S. EPA 2013b).

The previous U.S. EPA review of ozone in the 2006 Air Quality Criteria Document (AQCD) had already concluded that there was clear, consistent evidence that acute ozone exposure is causally associated with respiratory effects (U.S. EPA 2006). Additionally, the 2006 AQCD for ozone concluded that the evidence was highly suggestive of ozone causing mortality, but that there was limited evidence for ozone causing cardiovascular effects. In the 2013 ISA, the U.S. EPA cited that several lines of evidence provide support for the respiratory effects of ozone, including human exposure studies, epidemiology and toxicology, which led to the conclusion that there was a causal relationship with short-term ozone exposures, and a likely causal relationship with long-term ozone exposures. In humans, respiratory effects were detected in laboratory studies at 0.06 ppm ozone concentrations, and in epidemiological studies with average ozone concentrations as low as 0.03 ppm (Strickland et al. 2010; Kim et al. 2011). Some populations are more sensitive to the health effects of ozone than others, including elderly persons, children, outdoor workers and persons with asthma.

## PARTICULATE MATTER

Airborne particulates are a complex group of pollutants that vary in physical, chemical, and biological dimensions. Physically, particles can vary by size, surface area and roughness, shape, and mass. Chemically, they vary by chemical composition. Biologically, they can vary by toxicity. In addition, particles vary by source, and can come from anthropogenic (man-made, such as from combustion of fuels, or frictional abrasion) or “natural” (plants – for example, pollens and spores) origins. The composition of particulate matter can vary across sub-regions, and a description of the spatial differences in PM composition can be found in the draft 2016 AQMP Chapter 2 and Appendix II.

The National Ambient Air Quality Standard for particulate matter was established in 1971, and set limits on the ambient level of Total Suspended Particulates (TSP). In 1987, the national particulate matter standards were revised to focus on particles sized 10  $\mu\text{m}$  (micrometers) aerodynamic diameter and smaller. These can be inhaled and deposited throughout the upper and lower

respiratory system, depositing in both airways and gas-exchange areas of the lung. These particles are referred to as PM<sub>10</sub>. U.S. EPA initially promulgated ambient air quality standards for PM<sub>10</sub> of 150 µg/m<sup>3</sup> averaged over a 24-hour period, and 50 µg/m<sup>3</sup> for an annual average. U.S. EPA has since rescinded the annual PM<sub>10</sub> standard, but kept the 24-hour standard.

As more health research data has become available, concerns have centered on smaller and smaller particles. Additional focus has been placed on particles having an aerodynamic diameter of 2.5 µm or less (PM<sub>2.5</sub>). A greater fraction of particles in this size range can penetrate and deposit deep in the lungs. The U.S. EPA established standards for PM<sub>2.5</sub> in 1997 and in 2006 lowered the air quality standards for PM<sub>2.5</sub> to 35 µg/m<sup>3</sup> for a 24-hour average and reaffirmed 15 µg/m<sup>3</sup> for an annual average standard. There was considerable controversy and debate surrounding the review of particulate matter health effects and the consideration of ambient air quality standards (Kaiser 1997; Vedal 1997) when the U.S. EPA promulgated the initial PM<sub>2.5</sub> standards in 1997. In 2002, the California Air Resources Board adopted an air quality standard for PM<sub>2.5</sub> at a level of 12 µg/m<sup>3</sup>, in the form of an annual average.

Since that time, additional studies have been published and some of the key studies were closely scrutinized and the data reanalyzed by additional investigators. The reanalyses confirmed the original findings, and there are now additional data confirming and extending the range of the adverse health effects of PM<sub>2.5</sub> exposures. In 2012, the U.S. EPA revised the PM<sub>2.5</sub> annual average standard to 12.0 µg/m<sup>3</sup> (U.S. EPA 2013c). This federal standard is set at same level as the current California PM<sub>2.5</sub> annual standard, although the California standard does not have a specified attainment date. In 2014, the U.S. EPA announced it is preparing an ISA as part of the review of the federal PM standards (the process is described briefly in the draft AQMP Chapter 8). The draft AQMP Chapter 2 and Appendix II provide additional information about how PM levels in the South Coast Air Basin compare to the federal and state standards.

There have been several reviews of the health effects of ambient particulate matter (American Thoracic Society 1996a; Brunekreef et al. 2002; U.S. EPA 2004; U.S. EPA 2009; Brook et al. 2010). In addition, the California Air Resources Board (CARB) and the Office of Environmental Health and Hazard Assessment (OEHHA) have reviewed the adequacy of the California Air Quality Standards for Particulate Matter (California Air Resources Board and Office of Environmental Health Hazard Assessment 2002).

The major types of health effects associated with particulate matter include:

- Increased mortality
- Exacerbation of respiratory disease and of cardiovascular disease as evidenced by increases in:
  - Respiratory symptoms, exacerbation of asthma
  - Cardiovascular symptoms, non-fatal myocardial infarction
  - Hospital admissions and emergency room visits

- Physician office visits
- School absences
- Adverse birth outcomes
- Effects on lung function
- Changes in lung morphology

In the 2009 Integrated Science Assessment for Particulate Matter, the U.S. EPA presented conclusions on the particulate matter causal determination of several health effects based on an updated review of scientific studies (U.S. EPA 2009). The conclusions are presented separately for particulates in the size range of 2.5 to 10 micrometers ( $\mu\text{m}$ ) in aerodynamic diameter (PM<sub>10-2.5</sub>, often referred to as the coarse fraction) and those  $\leq 2.5 \mu\text{m}$  (PM<sub>2.5</sub>, or fine particles). Of note, there is currently no federal or California standard for PM<sub>10-2.5</sub>, although a PM<sub>10</sub> standard remains in effect. These conclusions are depicted in the following tables.

**TABLE I-4**Summary of U.S. EPA's Causal Determinations for Health Effects of PM<sub>10-2.5</sub>

<b>SHORT-TERM EXPOSURES</b>	
<b>Health Outcome</b>	<b>Causality Determination</b>
Cardiovascular effects	Suggestive of a causal relationship
Respiratory effects	Suggestive of a causal relationship
Mortality	Suggestive of a causal relationship
<b>LONG-TERM EXPOSURES</b>	
<b>Health Outcome</b>	<b>Causality Determination</b>
Cardiovascular effects	Inadequate to infer a causal relationship
Respiratory effects	Inadequate to infer a causal relationship
Mortality	Inadequate to infer a causal relationship
Reproductive and developmental	Inadequate to infer a causal relationship

(From (U.S. EPA 2009) Table 2-3 and Section 2.3.4)

There are also differences in the composition and sources of particles in the different size ranges that may have implications for health effects. The particles in the coarse fraction (PM<sub>10-2.5</sub>) are mostly produced by mechanical processes. These include automobile tire wear, industrial processes such as cutting and grinding, and resuspension of particles from the ground or road surfaces by wind and human activities, such as agricultural, mining, and construction operations, which may be particularly important in rural areas.

**TABLE I-5**Summary of U.S. EPA's Causal Determinations for Health Effects of PM<sub>2.5</sub>

<b>SHORT-TERM EXPOSURES</b>	
<b>Health Outcome</b>	<b>Causality Determination</b>
Cardiovascular effects	Causal relationship
Respiratory effects	Likely to be a causal relationship
Central nervous system	Inadequate to infer a causal relationship
Mortality	Causal relationship
<b>LONG-TERM EXPOSURES</b>	
<b>Health Outcome</b>	<b>Causality Determination</b>
Cardiovascular effects	Causal relationship
Respiratory effects	Likely to be a causal relationship
Mortality	Causal relationship
Reproductive and developmental	Suggestive of a causal relationship
Cancer, Mutagenicity, Genotoxicity	Suggestive of a causal relationship

(From (U.S. EPA 2009) Tables 2-1 and 2-2)

In contrast, particles smaller than 2.5  $\mu\text{m}$  are mostly derived from combustion sources, such as automobiles, trucks, and other vehicle exhaust, as well as from stationary combustion sources. The particles are either directly emitted or are formed in the atmosphere from gases that are emitted. Components from material in the earth's crust, such as dust, are also present, with the amount varying in different locations.

Attention to another range of very small particles has been increasing over the last several years. These are generally referred to as "ultrafine" particles, with diameters of 0.1  $\mu\text{m}$  or less. Ultrafine particles are mainly composed of particles from fresh emissions of combustion sources, but are also formed in the atmosphere by condensation of vapors that are emitted or by chemical or photochemical reactions with other contaminants in the air.

Ultrafine particles have relatively short half-lives (minutes to hours) and the particle size rapidly grows through condensation and coagulation processes into particles within the PM<sub>2.5</sub> size range. Ultrafine particles are garnering interest since a limited number of epidemiological and some laboratory studies, though not all, indicate that their toxicity may be higher on a mass basis than larger particles. There is also evidence that these small particles, or toxic components carried on their surface, can translocate from the lung to the blood and to other organs of the body, or through the olfactory bulb into the brain (U.S. EPA 2009). Currently, there are no federal or California

standards for ultrafine particles. As such, the health effects of ultrafine particles is discussed in a separate section following the discussion of PM10 and PM2.5.

The current federal and California standards for particulate matter are listed in Table I-6.

**TABLE I-6**

Ambient Air Quality Standards for Particulate Matter

STANDARD	FEDERAL	CALIFORNIA
PM10 24-Hour average	150 $\mu\text{g}/\text{m}^3$	50 $\mu\text{g}/\text{m}^3$
PM10 Annual Average	--	20 $\mu\text{g}/\text{m}^3$
PM2.5 24-Hour Average	35 $\mu\text{g}/\text{m}^3$	--
PM2.5 Annual Average	12 $\mu\text{g}/\text{m}^3$	12 $\mu\text{g}/\text{m}^3$

## Short-Term Exposure Effects of PM

Epidemiological studies have provided evidence for most of the effects listed above. In an extensive report focusing on the history of particulate matter research, the U.S. EPA reviewed several well-conducted studies that reported an association between mortality and increased daily or several-day-average concentrations of PM10 (U.S. EPA 2004). In addition, excess mortality and morbidity are reported in many studies involving communities across the U.S. as well as in Europe, Asia, and South America (U.S. EPA 2009; Lu et al. 2015; Shah et al. 2015; Cai et al. 2016), although there are some studies that show no effect for the specific exposures and outcomes evaluated (Milojevic et al. 2014; Wang et al. 2015; Zu et al. 2016). While there were some studies conducted in California, the importance of assessing results from studies from many different locations around the world should not be understated. The repeatability and consistency of results across many locations strengthens the weight of evidence in the determination of causality.

A review and analysis of epidemiological literature for acute adverse effects of particulate matter was published by the American Thoracic Society in 1996, where several adverse effects were listed as associated with daily PM10 exposures (Table I-7). The review also reported that individuals who are elderly or have preexisting lung or heart disease are more susceptible than others to the adverse effects of PM10 (American Thoracic Society 1996a).



**TABLE I-7**

## Combined Effect Estimates of Daily Mean Particulate Pollution (PM10)

	<b>% CHANGE IN HEALTH INDICATOR PER EACH 10 µg/m<sup>3</sup> INCREASE IN PM10</b>
Increase in Daily Mortality	
Total deaths	1.0
Respiratory deaths	3.4
Cardiovascular deaths	1.4
Increase in Hospital Usage (all respiratory diagnoses)	
Admissions	1.4
Emergency department visits	0.9
Exacerbation of Asthma	
Asthmatic attacks	3.0
Bronchodilator use	12.2
Emergency department visits*	3.4
Hospital admissions	1.9
Increase in Respiratory Symptom Reports	
Lower respiratory	3.0
Upper respiratory	0.7
Cough	2.5
Decrease in Lung Function	
Forced expiratory volume	0.15
Peak expiratory flow	0.08

\* One study only

(From: (American Thoracic Society 1996a))

Since then, many more recent studies have provided additional evidence that excess mortality and morbidity are associated with short-term exposure to PM10 and PM2.5 (Pope et al. 2006).

Estimates of mortality effects from studies of PM10 exposures range from 0.3 to 1.7 percent increase for a 10 µg/m<sup>3</sup> increase in PM10 levels. The National Morbidity, Mortality, and Air Pollution Study (NMMAPS), a study of 20 of the largest U.S. cities, determined a combined risk estimate of about a 0.5 percent increase in total mortality for a 10 µg/m<sup>3</sup> increase in PM10 (Samet et al. 2000a). This

study also analyzed the effects of gaseous co-pollutants. When the gaseous pollutants were included in the analyses, the estimated associations between PM<sub>10</sub> and mortality remained, though they were somewhat reduced. These results suggest that the effects reported in the study are likely due to the particulate exposures; they cannot readily be explained by coexisting weather stresses or other pollutants.

An expansion of the NMMAPS study to 90 U.S. cities also reported association with PM<sub>10</sub> levels and mortality (Samet et al. 2000b; Health Effects Institute 2003). After the study was published, it was discovered that some of the study analyses had been performed with incorrect default values. The strong positive association between acute PM<sub>10</sub> exposure and mortality remained, both upon reanalysis using revised software and using alternative modeling approaches (Dominici et al. 2002; Health Effects Institute 2003).

Studies of short-term exposures to PM<sub>2.5</sub> have also found associations with increases in mortality. The NMMAPS study conducted a national analysis of PM<sub>2.5</sub> mortality association for 1999-2000. The risk estimates were 0.29 percent for all-cause mortality and 0.38 percent for cardio-respiratory mortality (Dominici et al. 2007). In its 2009 review, U.S. EPA determined that estimates for PM<sub>2.5</sub> generally are in the range of 0.29 to 1.21 percent increase in total deaths per 10 µg/m<sup>3</sup> increase in 24-hour PM<sub>2.5</sub> levels. The estimates for cardiovascular related mortality range from 0.03 to 1.03 percent per 10 µg/m<sup>3</sup>, and for respiratory mortality estimates range from 1.01 to 2.2 percent per 10 µg/m<sup>3</sup> 24-hour PM<sub>2.5</sub> (U.S. EPA 2009). Figure I-4 shows a summary of U.S. and Canadian studies of mortality and short-term PM<sub>2.5</sub> exposures, which shows that the most consistent positive associations were seen with cardiovascular and all-cause deaths. Positive associations for respiratory deaths were also seen in several of these studies, although the precision of the estimates for respiratory deaths was lower relative to that of all-cause or cardiovascular deaths.

Several studies have attempted to assess the relative importance of particles smaller than 2.5 µm and those between 2.5 µm and 10 µm (PM<sub>10-2.5</sub>). While some studies report that PM<sub>2.5</sub> levels are better predictors of mortality effects, others suggest that PM<sub>10-2.5</sub> is also important. Most of the studies found higher mortality associated with PM<sub>2.5</sub> levels than with PM<sub>10-2.5</sub>. For example, a study of six cities in the U.S. found that particulate matter less than 2.5 µm was associated with increased mortality, but that the larger particles were not. In the U.S. EPA review (U.S. EPA 2009), several studies were presented that found associations of PM<sub>10-2.5</sub> and mortality. Some of the studies showed differences by region of the U.S. In one study of 47 U.S. cities that had both PM<sub>2.5</sub> and PM<sub>10</sub> data available to calculate PM<sub>10-2.5</sub> as a difference, overall, the study found a significant association between the computed PM<sub>10-2.5</sub> and all-cause, cardiovascular, and respiratory mortality. The study also reported differences by season and climate area (Zanobetti et al. 2009).

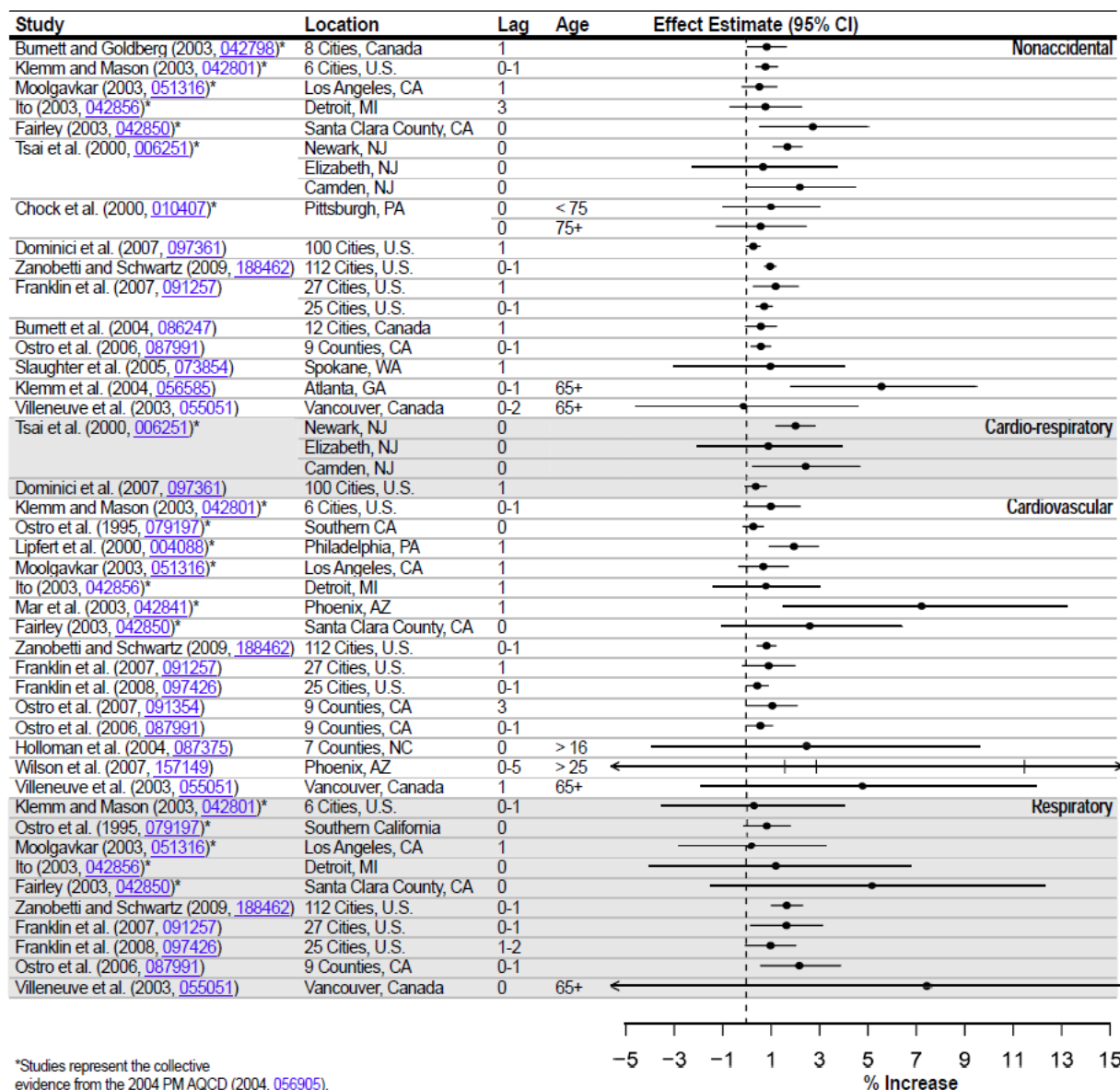
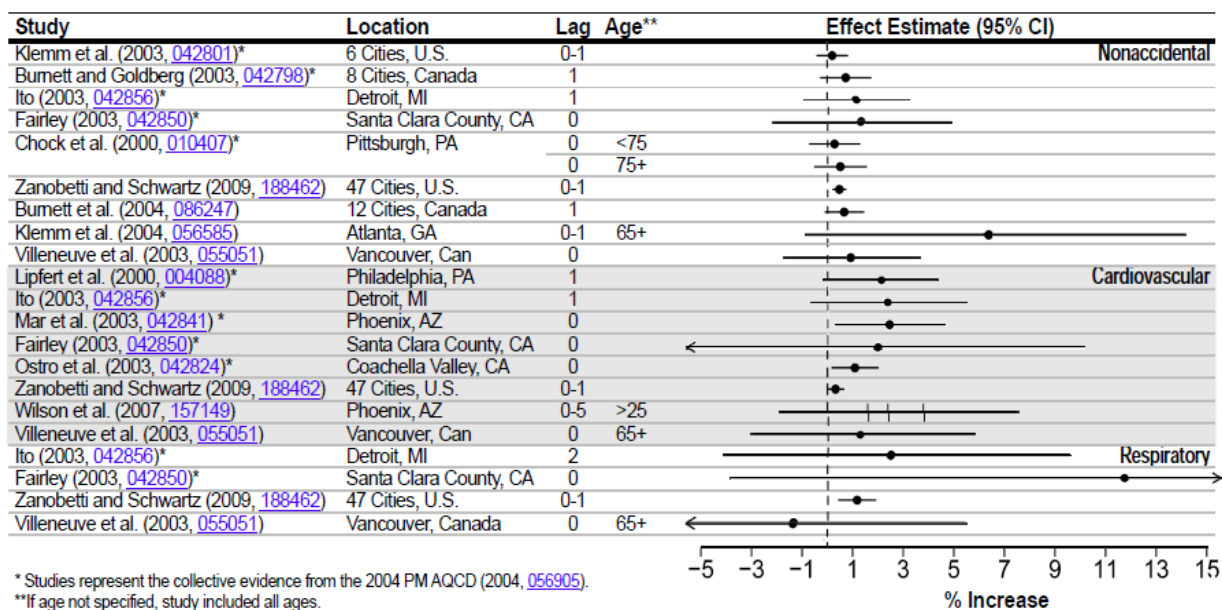


FIGURE I-4

Summary of Non-accidental All-Cause and Cause-Specific Mortality per 10 µg/m<sup>3</sup> Increase in PM<sub>2.5</sub> Short-term Exposures, for U.S.- and Canadian-based studies (from (U.S. EPA 2009), Figure 6-27). “Lag” indicates the number of days between the exposure and the outcome assessed.

A major knowledge gap in understanding the relative importance of “fine” PM (PM<sub>2.5</sub>) and “coarse” PM (PM<sub>10-2.5</sub>) is the relative lack of direct measurements of PM<sub>10-2.5</sub>. Most estimates are made by subtracting PM<sub>2.5</sub> from PM<sub>10</sub> measured at co-located samplers, a process that is subject to errors that are inherent in the subtracting of one relatively large number from another. More research is needed to better assess the relative effects of coarse (PM<sub>10-2.5</sub>) fractions of particulate matter on mortality. A graph from the U.S. EPA review is included in the figure below to demonstrate ranges

of mortality findings associated with coarse particulates. Consistent positive associations are seen, particularly for cardiovascular and nonaccidental all-cause mortality, with varying degrees of precision across the different studies.



**FIGURE I-5**

Summary of Percent Increase in Total (Nonaccidental) and Cause-Specific Mortality Per 10  $\mu\text{g}/\text{m}^3$  Increase in PM<sub>10-2.5</sub> Short-term Exposure (from (U.S. EPA 2009), Figure 6-30). “Lag” indicates the number of days between the exposure and the outcome assessed.

A number of studies have evaluated the association between particulate matter exposure and indices of morbidity such as hospital admissions, emergency room visits or physician office visits for respiratory and cardiovascular diseases. The effect estimates for these various morbidities are generally higher than the estimates for mortality. Observed effects have been associated with PM<sub>10</sub>, PM<sub>2.5</sub> and PM<sub>10-2.5</sub>.

In the NMMAPS study, hospital admissions for those 65 years or older were assessed in 14 U.S. cities. Several models were compared to estimate associations of hospital admissions for specific disease categories and short-term PM<sub>10</sub> levels. Hospital admissions showed an increase ranging from 0.68 – 1.47 percent for cardiovascular diseases, a range of 1.46 – 2.88 percent increase for COPD, and a range of 1.31 – 2.86 percent increase for pneumonia per 10  $\mu\text{g}/\text{m}^3$  increase in PM<sub>10</sub> (Samet et al. 2000b). In the reanalysis of the study (Health Effects Institute 2003), it was found that when using different models, the pollution coefficients were generally lower. However, the authors note that most of the conclusions of associations with PM<sub>10</sub> exposures and hospital admissions held. Two recent Southern California studies evaluated associations between short-term PM<sub>2.5</sub> levels and asthma-related hospital or emergency admissions. One study, based in Orange County, reported

increased risk of asthma-related hospital encounters with increased ozone and PM<sub>2.5</sub> in the warm seasons, and with CO, NO<sub>x</sub>, and PM<sub>2.5</sub> in the cool seasons (Delfino et al. 2014). The second study, conducted in Los Angeles County, reported monthly average PM<sub>2.5</sub>, CO, and NO<sub>2</sub> levels were positively associated with asthma hospitalization rates (Delamater et al. 2012).

Similarly, school absences, lost workdays, and restricted activity days have also been used in some studies as indirect indicators of acute respiratory conditions (Ostro 1987; Ostro 1990; Ransom et al. 1992; Gilliland et al. 2001; Park et al. 2002; Hales et al. 2016). These observations help support the hypotheses that particulate matter exposures increase inflammation in the respiratory tissues and may also increase susceptibility to infection (U.S. EPA 2009).

Some studies have reported that short-term particulate matter exposure is associated with changes in lung function (lung capacity and breathing volume); upper respiratory symptoms (hoarseness and sore throat); and lower respiratory symptoms (increased sputum, chest pain and wheeze). The severity of these effects is widely varied and is dependent on the population studied, such as adults or children with and without asthma. Sensitive individuals, such as those with asthma or pre-existing respiratory disease, may have increased or aggravated symptoms associated with short-term particulate matter exposures. Several studies have followed the number of medical visits associated with pollutant exposures. A range of increases from 1 to 4 percent for medical visits for respiratory illnesses was found corresponding to a 10 µg/m<sup>3</sup> change in PM<sub>10</sub>. A number of studies also looked at levels of PM<sub>2.5</sub> or PM<sub>10-2.5</sub>. The findings suggest that both the fine and coarse fractions may have associations with some respiratory symptoms (U.S. EPA 2009). Among the newer health endpoints evaluated in recent studies of short-term effects of PM<sub>2.5</sub> is stroke. One recent meta-analysis evaluated 16 studies of short-term PM<sub>2.5</sub> exposures and estimated a 5 percent increased risk of stroke for each 10 µg/m<sup>3</sup> increase in PM<sub>2.5</sub> (Shin et al. 2014).

The biological mechanisms by which particulate matter can produce health effects have been investigated in laboratory studies. Brook et al. (Brook et al. 2010) summarized three likely pathways by which PM exerts its effects on cardiovascular health outcomes: (1) PM can activate inflammatory pathways and cause systemic oxidative stress, leading to the production of pro-inflammatory cytokines; (2) PM can disrupt the autonomic nervous system leading to increased blood pressure, increased arrhythmic potential, and decreased heart rate variability; and (3) PM, particularly UFPs or particle constituents such as organic compounds and metals, can enter the bloodstream and cause increased constriction of the blood vessels and increased blood pressure. Each of these pathways may also lead to the formation of reactive oxygenated species (ROS, or free radicals) that can cause DNA oxidation and systemic inflammation. Inflammatory responses in the respiratory system in humans and animals can lead to inflammation in fat tissues and in the liver, which can lead to vascular dysfunction (e.g. atherosclerosis), changes in metabolic function (e.g. insulin resistance), and increased thrombotic potential (Brook et al. 2010). Several reviews discuss mechanistic studies in detail (Brunekreef et al. 2002; Brook et al. 2004; Brook et al. 2010). A study in cells using ambient air samples in communities near railyards in the South Coast Air Basin found that the PM<sub>2.5</sub> phase of ambient air pollution contains prooxidant components, primarily metals, which can trigger an

inflammatory response in the cells (Eiguren-Fernandez et al. 2015; Cho 2016). The same study noted that vapor phase pollutants, which contain most of the electrophiles, may trigger a different biological response in the cells, suppressing inflammatory responses and could result in a reduced ability to fight off infections.

Some studies have examined the health effects of short-term exposures to specific PM constituents and sources (Lippmann 2014; Basagana et al. 2015; Atkinson et al. 2016). While there is some evidence suggesting possible links with specific constituents or sources, such as diesel exhaust, sulfates (related to coal combustion), and certain metals, the U.S. EPA determined that there were not enough studies evaluating short-term constituent- or source-specific exposures at the time of the previous Integrated Science Assessment to be able to make a causal determination (U.S. EPA 2009).

## Long-Term Exposure Effects of PM

Numerous studies have evaluated the health effects of long-term (months to years) or chronic exposure to particulate matter, with the largest number of studies examining cardiovascular and respiratory health endpoints, as well as mortality. Other health outcomes that have been linked to long-term PM exposures include reproductive effects, cancer outcomes, and, more recently, metabolic syndromes and neurological effects. The U.S. EPA 2009 Integrated Science Assessment for Particulate Matter (ISA for PM) concluded that sufficient evidence is available to support a causal determination for long-term PM<sub>2.5</sub> exposures and cardiovascular and mortality effects, and a likely causal relationship for respiratory effects. A summary of the evidence is presented below, focusing on the long-term effects of PM<sub>2.5</sub> exposures.

Many research studies, including some recent studies, have evaluated the health effects of exposures to air pollutants from traffic emissions using a variety of exposure modeling techniques (Hart et al. 2014; Harris et al. 2015; Kingsley et al. 2015; Rice et al. 2015; Danysh et al. 2016). In general, these articles are not discussed in detail here, because of the difficulty in attributing the observed effects to a specific pollutant or combination of pollutants. However, these studies do provide supporting evidence that air pollutants from traffic exhaust are linked to health effects in humans.

### Long-Term Particulate Matter Exposures and Mortality

Since the initial promulgation by U.S. EPA of the National Ambient Air Quality Standards for PM<sub>2.5</sub>, controversy has remained over the association of mortality and exposures to PM<sub>2.5</sub>. Several large, prospective cohort studies conducted in the U.S. and Canada were used to evaluate long-term PM exposures and mortality, including total number of deaths and deaths due to specific causes. The strongest and most consistent evidence of long-term PM<sub>2.5</sub> effects are for cardiovascular mortality, particularly ischemic heart disease, and there is evidence that ambient PM<sub>2.5</sub> exposure is associated with and lung cancer mortality (Dominici et al. 2006; Krewski et al. 2009; Jerrett et al. 2013; International Agency for Research on Cancer 2015). Below is a brief discussion of the evidence linking

PM and mortality reviewed in the U.S. EPA 2009 ISA along with more recently published studies, with a focus on large prospective studies and studies conducted in California or Southern California.

In the assessment of evidence for mortality outcomes linked to long-term PM exposures, the 2009 U.S. EPA ISA for PM reviewed 15 studies evaluating PM<sub>2.5</sub> exposures, 2 studies evaluating PM<sub>10-2.5</sub> exposures, and 5 studies evaluating PM<sub>10</sub> exposure. The majority of these studies were conducted in the United States, and 3 of the studies of PM<sub>2.5</sub> exposures were conducted in California or Southern California. Previous reviews conducted in 1996 and 2004 by U.S. EPA assessed evidence primarily from large prospective cohort studies, such as the Harvard Six Cities Study (Dockery et al. 1993), the American Cancer Society (ACS) Study (Pope et al. 1995; Pope et al. 2002), and the Seventh-Day Adventist Health Air Pollution (AHSMOG) Study (Abbey et al. 1999; McDonnell et al. 2000). The U.S. EPA 2004 PM Air Quality Criteria Document concluded that there was strong evidence linking long-term PM<sub>2.5</sub> exposures to all-cause and cardiopulmonary mortality, but not enough evidence for a link with PM<sub>10-2.5</sub>. The 2009 U.S. EPA ISA for PM similarly concluded that the newer studies provide additional evidence to support a causal determination for long-term PM<sub>2.5</sub> exposures and increased mortality risk, but there continues to be insufficient evidence supporting such a link with particles in the coarse fraction. This most recent U.S. EPA review evaluated the additional updated analyses of the previously-established large cohort studies (Harvard Six Cities, ACS, AHSMOG, and Veterans studies), and noted two new major cohorts that provide further evidence linking PM<sub>2.5</sub> and mortality: the Women's Health Initiative (WHI) study (Miller et al. 2007) and the Medicare Cohort Studies (Eftim et al. 2008).

The American Cancer Society Cancer Prevention Study II (ACS) is a large, prospective national cohort study of over one million participants in the U.S. recruited from all 50 states, the District of Columbia and Puerto Rico, and followed over many years. Over the past two decades, studies using data from this cohort have reported associations for PM<sub>2.5</sub> for both total mortality and cardiorespiratory mortality (Pope et al. 1995; Krewski 2000; Pope et al. 2002; Jerrett et al. 2005; Krewski et al. 2009; Jerrett et al. 2013; Pope et al. 2015). The survey included several measures of smoking and exposure to second-hand smoke, which were included in the statistical models to account for the potential confounding effects of smoking. The original study reported that long-term exposures to fine particulate air pollution were associated with cardiopulmonary and lung cancer mortality (Pope et al. 1995). In a reanalysis of the data (Krewski 2000), mortality rates and PM<sub>2.5</sub> levels were analyzed for 50 metropolitan areas of the U.S. Average (median) levels from monitors in each metropolitan area were used to estimate PM<sub>2.5</sub> exposures. At these levels of aggregation, regional differences in the association of PM<sub>2.5</sub> and mortality were noted, with higher mortality risks in the Northeast and Midwest, and more moderate mortality risks in the West.

Another follow-up study of the American Cancer Society cohort confirmed and extended the findings in the initial study. The researchers estimated that, on average, a 10 µg/m<sup>3</sup> increase in fine particulates was associated with approximately a 4 percent increase in total mortality, a 6 percent increase in cardiopulmonary mortality, and an 8 percent increase in risk of lung cancer mortality (Pope et al. 2002). In an additional reanalysis and extension of the American Cancer Society cohort

from 1982 to 2000 (Krewski et al. 2009), and including additional metropolitan areas for the most recent years, effects estimates on mortality were similar, though somewhat higher than those reported previously. The extended analyses included an additional 11 years of cohort follow-up compared to the original study. The authors reported positive and significant association between a 10  $\mu\text{g}/\text{m}^3$  change in PM<sub>2.5</sub> level and all-cause, cardiopulmonary disease, and ischemic heart disease deaths. Mortality from ischemic heart disease was associated with the largest risk estimates.

Subsets of the ACS study data have also been evaluated to estimate effects in California and the metropolitan Los Angeles area (Jerrett et al. 2005; Jerrett et al. 2013). These results are discussed further below, along with results of other California or Southern California-based studies.

The Harvard Six Cities Study is a large prospective cohort study of adults in six U.S. cities, and began in the year 1974. The original analysis and a subsequent reanalysis found positive associations between particulate matter and sulfate in relation to mortality, after controlling for potential confounding factors such as smoking status, sex, age, and other factors (Dockery et al. 1993)(Krewski 2000). An extension of the Harvard Six Cities Cohort confirmed the association of mortality with PM<sub>2.5</sub> levels, and reported that improvements in PM<sub>2.5</sub> levels over the study time period were associated with decreased mortality risk (Laden et al. 2006). An update to this study covering the years 1974 to 2009 found a linear relationship of PM<sub>2.5</sub> levels and mortality from all causes, cardiovascular causes, and from lung cancer (Lepeule et al. 2012). According to the authors, the PM<sub>2.5</sub> levels decreased over time, but no evidence of a threshold for these effects was found.

AHSMOG is a cohort study of non-Hispanic white Seventh-day Adventists in California, with participants followed starting from the late 1970's. Confounding due to smoking in this study is unlikely due to very low smoking rates in this population; however, the study is limited in its ability to apply the findings to other population groups. The study has linked long-term PM<sub>10</sub> exposures and other air pollutants to deaths from all natural causes and deaths due to lung cancer among males (Abbey et al. 1999), although the authors concluded that these associations were likely due to exposures to fine particles rather than the coarse fraction of PM<sub>10</sub> (McDonnell et al. 2000). In a re-analysis of the data, the study found PM<sub>2.5</sub> was associated with an increased risk of coronary heart disease mortality among females but not among males (Chen et al. 2005). Similar associations among females only were found for coarse particles and PM<sub>10</sub>.

Other cohort studies include an analysis of mortality and PM<sub>2.5</sub> exposures in a Medicare enrollee population. Zeger et al. (Zeger et al. 2008) assembled a Medicare enrollee cohort by including all Medicare enrollees residing in over 4,500 zip codes with centroids within six miles of a PM<sub>2.5</sub> monitor. PM<sub>2.5</sub> data was obtained from the monitoring stations, and mean annual levels were calculated for the zip codes within six miles of each monitor. The authors found that long-term exposures to PM<sub>2.5</sub> was associated with all-cause mortality for the eastern and central portions of the U.S., and these mortality risk estimates were similar to those previously published in the Six Cities Study and the American Cancer Society cohorts. The authors reported that there were no statistically significant associations between zip code levels of PM<sub>2.5</sub> and all-cause mortality rates in the western



region of the U.S. This finding was attributed largely to the higher PM<sub>2.5</sub> levels in Los Angeles area counties compared to other western urban areas, but there were not higher mortality rates in the Los Angeles area counties. Several factors could explain this finding. The authors note that the toxicity of the PM mixture may differ by location, e.g. with higher PM<sub>2.5</sub> sulfate levels in the eastern region. In addition, the use of ecological data rather than individual-level data for exposure assessment and some confounding factors, and the assessment of all-cause mortality rather than cause-specific mortality may have impacted the results of this study. For example, the authors used county-level COPD risk as an estimate of smoking prevalence, because individual-level measures of smoking were not available. The authors further reported that they found no associations of PM<sub>2.5</sub> with all-cause mortality in persons aged 85 years or higher, which may reflect other competing causes of death in this age group not related to air pollution exposures.

The Women's Health Initiative (WHI) Study is a nationwide cohort of post-menopausal women in 36 metropolitan areas of the U.S. who had no history of cardiovascular disease (Miller et al. 2007). The study found that long-term exposure to PM<sub>2.5</sub> was associated with a 24 percent increased risk of cardiovascular disease and a 76 percent increased risk of death from cardiovascular causes for each additional 10 µg/m<sup>3</sup> of PM<sub>2.5</sub>; these relative risk estimates are larger than those reported in the ACS and Six Cities Studies, but differences in health status, PM composition, and overall mortality risk in these distinct populations may account for such differences in the effect estimates. The WHI study results accounted for the potential confounding effects of several factors, including medical risk factors for cardiovascular disease, measures of socioeconomic status, and cigarette smoking. Another large cohort study focusing on women is the Nurses' Health Study, which found that PM<sub>10</sub> exposures were associated with all-cause mortality and fatal coronary heart disease, with exposures 24 months prior to death having the strongest effects (Puett et al. 2008). These results accounted for several potential confounders, including smoking status and history, medical risk factors for cardiovascular disease, and area-level measures of socioeconomic status. This study did not evaluate PM<sub>2.5</sub> exposures.

A recent pooled analysis of 22 European cohorts and including over 350,000 participants evaluated long-term air pollution exposures and exposure to PM<sub>2.5</sub>, PM<sub>10</sub>, and nitrogen oxides, using land use regression models to estimate exposures (Beelen et al. 2014). The authors reported that a 5 µg/m<sup>3</sup> increase in PM<sub>2.5</sub> was associated with approximately a 7 percent increase in mortality from natural causes.

Estimates of mortality risks associated with long-term PM<sub>2.5</sub> levels from recent studies are shown in the figure below. The recent evidence is consistent with past studies, showing increased risk of premature death with increased PM<sub>2.5</sub> exposures. For cause-specific mortality, consistent positive associations are seen with cardiovascular mortality endpoints and with lung cancer deaths, but weak associations are seen with overall respiratory mortality.

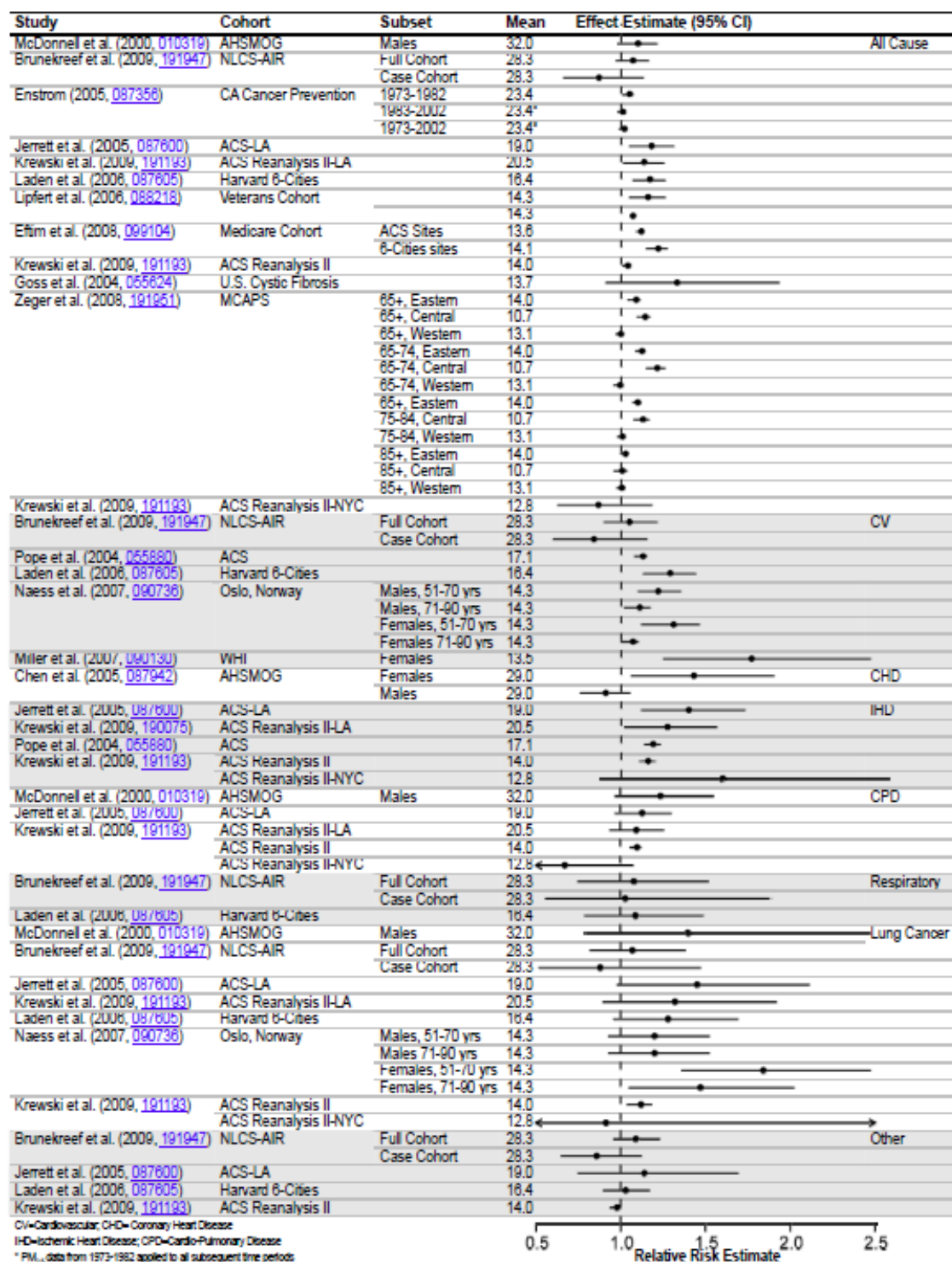


FIGURE I-6

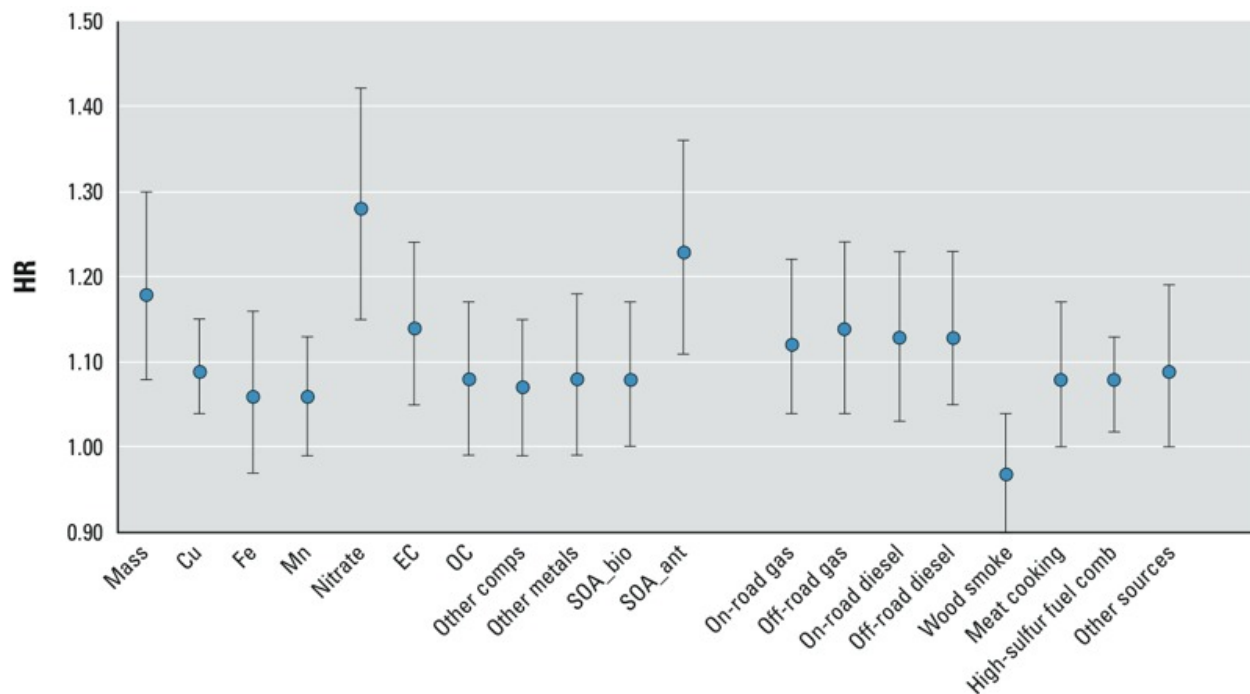
Mortality Risk Estimates, Long-Term Exposure to PM<sub>2.5</sub> in Cohort Studies (From (U.S. EPA 2009), Figure 7-7). “Mean”=mean PM<sub>2.5</sub> exposure estimates in the study. CV=cardiovascular, CHD=coronary heart disease, IHD=ischemic heart disease, CPD=cardiopulmonary disease.

In addition to the AHSMOG study, other analyses of mortality and PM<sub>2.5</sub> levels specific to California have also been reported, including an analysis of a subset of the ACS II data. An analysis of the ACS II study (Jerrett et al. 2013) followed individuals in California from that cohort recruited starting in 1982, with follow-up to 2000. PM<sub>2.5</sub> levels at subject residences were estimated using land use regression models. Over 40 potential confounders were included in the statistical models, and included individual-level variables (e.g. smoking, diet, demographic, and other factors) and neighborhood-level variables (e.g. unemployment, poverty, income inequality, racial composition). The authors noted that mortality rates differ in urban areas compared to non-urban areas, and adjusted for urban/rural status in the model to estimate pollution effects on mortality. All-cause mortality, mortality from cardiovascular disease, and mortality from ischemic heart disease were positively associated with PM<sub>2.5</sub> levels in single-pollutant models. These associations with PM<sub>2.5</sub> remained after additional adjustment for ozone levels. Because of moderate correlations across pollutants, it may not be possible to draw conclusions about which pollutant(s) in this mixture cause the observed effects. Positive associations of all-cause and certain cause-specific mortality rates with estimated NO<sub>2</sub> and ozone levels were also found. The authors concluded that these results indicate that several components of combustion-related pollutant mixture are associated with mortality.

A study analyzed data from the California Teachers Study cohort of over 100,000 active and retired school teachers recruited in 1995, and followed through 2005 (Lipsett et al. 2011). Pollutant exposures at the subject residences were estimated using data from ambient monitors, and extrapolated using a distance-weighted method. The authors reported that a 10 µg/m<sup>3</sup> increase in PM<sub>2.5</sub> was associated with a 20 percent risk increase in mortality from ischemic heart disease, but no associations were found with all-cause, cardiovascular, or lung cancer mortality. A 10 µg/m<sup>3</sup> increase in PM<sub>10</sub> was associated with increased risk of ischemic heart disease and incident stroke. These results accounted for several individual- and neighborhood-level factors, including smoking, second-hand smoke, medical risk factors for cardiovascular disease, and indicators of socioeconomic status.

A more recent analysis of the California Teachers Study cohort from 2001 through 2007 estimated the association between particulate pollutants and all-cause, cardiovascular, ischemic heart disease, and respiratory mortality (Ostro et al. 2015). Exposure data at the residential level were estimated by a chemical transport model that computed pollutant concentrations from over 900 sources in California. Besides particle mass, monthly concentrations of 11 species and 8 sources or primary particles were generated at 4-km grids. The results were reported as finding statistically significant associations of ischemic heart disease mortality with PM<sub>2.5</sub> mass and several of its components (Figure I-7). The study also found significant positive associations between ischemic heart disease mortality and ultrafine particle mass as well as several ultrafine particulate components including elemental carbon, organic carbon, copper, metals, meat cooking, and mobile source derived components. An earlier study using data from the same cohort had used monitoring data to estimate mortality risk, and similarly reported increased risk of all-cause, cardiopulmonary, and ischemic heart disease mortality with higher exposures to PM<sub>2.5</sub> mass. This study also reported increased ischemic heart disease risk with higher exposures to PM<sub>2.5</sub> constituents such as organic carbon, sulfates, and

nitrate (Ostro et al. 2010). Both studies adjusted for several individual- and neighborhood-level covariates, including smoking status and indicators of socioeconomic status.



**FIGURE I-7**

Association of PM<sub>2.5</sub> constituents and sources with Ischemic Heart Disease mortality (Hazard Ratios and 95 percent Confidence Intervals) using interquartile range. Abbreviations: comb = combustion; comps = components; SOA\_bio= secondary organic aerosols from biogenic sources (derived from long-chain alkanes, xylenes, toluenes, and benzene and their oligomers); SOA\_ant=secondary organic aerosols from biogenic sources (derived from isoprenes, monoterpenes, and sesquiterpenes and their oligomers). (From (Ostro et al. 2015))

A cohort of elderly individuals (average age of 65 years in 1973) recruited from 11 California counties was followed over several years (Enstrom 2005). A positive association for long-term PM<sub>2.5</sub> exposure with all-cause deaths was reported from 1973–1982. However, no significant association was found in the later time period of 1983–2002. PM<sub>2.5</sub> levels were obtained from measurements made during 1979–1983 by the EPA as part of the Inhalable Particle Monitoring Network and the cohort was confined to those participants in the American Cancer Society Cancer Prevention Study I who were living in the 11 counties that had one of the monitors. Pollutant levels were estimated using data from these monitors and averaged over each county, which may lead to exposure misclassification and bias toward finding no effect. The study adjusted for several potential confounding factors, including demographic factors, smoking, body mass index, and other factors.

The California Air Resources Board recently conducted a cross-sectional study of long-term PM<sub>2.5</sub> exposures in rural and urban areas within California, using ambient monitoring data from 116

stations in the monitoring network, and calculating zip code-level exposure estimates (Garcia et al. 2016). The study observed larger effect sizes for increased PM<sub>2.5</sub>-related mortality risk in rural compared to urban areas from all causes, cardiovascular disease and cardiopulmonary disease. In urban areas, the study found PM<sub>2.5</sub> exposures to be associated with increased risk of cardiovascular disease, ischemic heart disease, and cardiopulmonary disease; however, for all-cause non-accidental mortality risk, only an exposure model restricted to people living within 10 km of a monitoring station in urban areas showed an association with PM<sub>2.5</sub>. This study did not control for the potential confounding effects of smoking.

A recent study analyzed data from the National Institutes of Health AARP Diet and Health cohort, including about 160,000 participants in California (Thurston et al. 2016). Census tract-level PM<sub>2.5</sub> exposures were estimated based on land use regression models. For the California cohort, PM<sub>2.5</sub> levels were associated with an approximately 10 percent increase in cardiovascular disease mortality risk for each additional 10 µg/m<sup>3</sup> of PM<sub>2.5</sub>. A small but positive effect estimate was found for all-cause mortality in California, and no association was found for respiratory mortality in the California cohort, although the estimates indicated uncertainty in the magnitude and direction of these effects. This study adjusted for several potential confounders, including demographic factors, smoking, and indicators of socioeconomic status.

A few studies have focused on particulate matter exposure and health effects in residents of Southern California. Two analyses of the American Cancer Society II cohort, for example, focused specifically on the Los Angeles Metropolitan area using methods to estimate exposures on a finer geographical scale than previous studies that used geographic scales at the county or metropolitan area. Improved exposure estimation methods reduce potential bias from exposure misclassification. Using data from monitoring stations in the Los Angeles area, one study applied interpolation methods (Jerrett et al. 2005) and another applied land use regression techniques (Krewski et al. 2009) to estimate PM<sub>2.5</sub> exposures to the study participants. Significant associations of PM<sub>2.5</sub> with mortality from all causes and cardiopulmonary disease were reported, with the magnitude of risks being higher than those from the national studies of the American Cancer Society II cohort. Such improved exposure estimation techniques can reduce misclassification bias in epidemiological studies. It should be noted that various analyses were presented in these as well as other studies to estimate the influence of various individual-level and ecologic variables that might also be related to health effects risks. Including such variables helps control for potential confounding, but generally reduces the estimated association between PM<sub>2.5</sub> and all-cause mortality. It may be illustrative to describe some of the estimates from the various calculations as presented by the authors of the Los Angeles area cohort (Krewski et al. 2009). In the descriptions in Table I-9, HR refers to the “hazard ratio” expressed for a 10 µg/m<sup>3</sup> change in PM<sub>2.5</sub> exposure, followed by the 95 percent Confidence Interval. For example, if the hazard ratio is 2, the risk would be twice as high; and, conversely if the hazard ratio is 0.5, the risk would be one-half of that of the reference group. Several of the analyses results follow as excerpted from Krewski, 2009. Table I-8 includes PM<sub>2.5</sub>, plus various additional individual and ecological variables. Similar effects of covariate adjustment were seen for hazard ratios for

mortality from ischemic heart disease, although effect estimates were stronger for ischemic heart disease mortality compared to those for all-cause mortality.

**TABLE I-8**

## Influence of Adding Confounding Variables on All-Cause Mortality

VARIABLE INCLUDED	HAZARD RATIO per 10 µg/m <sup>3</sup> change in PM2.5 exposure
PM2.5 alone (stratified for age, sex, and race)	1.197 (95% CI, 1.082–1.325);
PM2.5 with 44 individual-level covariates*	1.143 (95% CI, 1.033–1.266)
PM2.5 with 44 individual-level covariates and the ecologic covariate of unemployment	1.127 (95% CI, 1.015–1.252)
PM2.5 with 44 individual-level covariates and social factors extracted from the principal component analysis (which account for 81% of the total variance in the social variables)	1.142 (95% CI, 1.026–1.272).
PM2.5 with 44 individual-level covariates and all ecologic covariates that were individually associated with mortality in bivariate models with PM2.5 exposure	1.115 (95% CI, 1.003–1.239)
PM2.5 parsimonious model that included 44 individual-level covariates and ecologic confounder variables that both reduced the pollution coefficient and had associations with mortality	1.126 (95% CI, 1.014–1.251)

\*These covariates included several measures of smoking.  
(From Krewski, 2009)

U.S. EPA also released a Regulatory Impact Analysis (U.S. EPA 2012) which looked at the costs and benefits of alternate PM2.5 standard levels. As part of the analysis, U.S. EPA looked at California-specific studies regarding PM2.5 and mortality published in the scientific literature. The U.S. EPA analysis concluded "most of the cohort studies conducted in California report central effect estimates similar to the (nation-wide) all-cause mortality risk estimate we applied from Krewski et al. (2009) and Laden et al. (2006) albeit with wider confidence intervals. A couple of cohort studies conducted in California indicate higher risks than the risk estimates we applied." Thus, in U.S. EPA's judgment, the California-related studies provided estimates of mortality consistent with or higher than those from the national studies.

At the time of the 2009 ISA, few studies had examined long-term exposures to chemical-specific PM constituents or compared source-specific PM effects on mortality (U.S. EPA 2009). The 2009 ISA discussed only two studies that used direct measurements of PM constituents other than sulfates: the Veteran's Cohort (Lipfert et al. 2006) and the Netherlands Cohort Study (Beelen et al. 2008). These studies found mortality associations with long-term exposures to traffic pollutants, nitrates and sulfates.

With measures adopted to control emissions of air pollutants, ambient levels of PM<sub>2.5</sub> have been decreasing. These reductions in particulate matter have been associated with reductions in mortality. For example, studies have found that increases in life expectancy are associated with reductions in air pollution levels, and that a portion of this increase can be attributed to reductions in PM<sub>2.5</sub> exposures (Correia et al. 2013; Pope et al. 2013).

### **Long-Term Particulate Matter Exposures and Cardiovascular Effects**

Studies of cardiovascular mortality provide the strongest evidence of an association between PM<sub>2.5</sub> exposures and cardiovascular effects. The U.S. EPA 2009 ISA review determined that the evidence is sufficient to infer a causal relationship between long-term PM<sub>2.5</sub> exposures and cardiovascular effects. In addition to the studies of mortality, other epidemiological studies provide additional evidence of sub-clinical and clinical cardiovascular effects, while toxicological studies suggest a plausible biological mechanism for such effects (Fanning et al. 2009; U.S. EPA 2009).

Epidemiological studies of subclinical effects typically have used subclinical measures of atherosclerosis, which is an underlying disease contributing to many clinical cardiovascular outcomes such as myocardial infarction, sudden cardiac death, stroke, and vascular aneurysms (U.S. EPA 2009). A study in Southern California residents used the carotid intima-media thickness (CIMT) as a measure of subclinical atherosclerosis (Kunzli et al. 2005). The subjects' residential areas were geocoded and a geospatial extrapolation of ambient monitoring data was used to assign annual mean concentrations of ambient PM<sub>2.5</sub>. The authors report results of an association between atherosclerosis and ambient air pollution as measured by PM<sub>2.5</sub>. The associations of PM<sub>2.5</sub> and CIMT were strongest in women  $\geq 60$  years of age. The Multi-Ethnic Study of Atherosclerosis (MESA) is a population-based study of people living in 6 U.S. cities or counties, including Los Angeles, CA (Diez Roux et al. 2008). The MESA study reported that 20-year average PM<sub>2.5</sub> exposures corresponded to a small increase in CIMT, although the magnitude of the increase was much smaller than the Kunzli 2005 study. The study accounted for the potential influence of sociodemographic factors, lipid status, smoking, diabetes, body mass index, and geographical location. Such differences may be attributable to differences in the study populations. Other sub-clinical outcome measures for atherosclerosis in the MESA study were weakly associated or not associated with PM exposures.

Clinical cardiovascular outcomes have also been examined in several epidemiological studies, including two that were based on prospective cohort studies: the Women's Health Initiative (WHI) Observational Study (Miller et al. 2007) and the Nurses' Health Study (Puett et al. 2008). Both these studies also examined cardiovascular mortality, and found links with long-term particulate matter

exposures. The WHI study included only women who were free of cardiovascular disease at enrollment, and estimated PM<sub>2.5</sub> exposures using a nearest monitor approach. The study found PM<sub>2.5</sub> exposures to be associated with cardiovascular disease outcomes, including myocardial infarction, revascularization, stroke, coronary heart disease death, and cerebrovascular disease, and accounted for the several potential confounding factors, such as sociodemographic factors, medical risk factors for cardiovascular disease, and cigarette smoking (Miller et al. 2007). An analysis of the Nurses' Health Study included women without a history of myocardial infarction and who lived in certain metropolitan areas in the northeastern U.S. (Puett et al. 2008). Long-term PM<sub>10</sub> exposures were estimated using land use regression models as well as air pollution monitoring data, and the results accounted for potential confounding by smoking status and history, medical risk factors for cardiovascular disease, and area-level measures of socioeconomic status. This study found positive associations with the risk of all-cause and coronary heart disease mortality, and the results were suggestive of a link to coronary heart disease events although there was a great deal of uncertainty in this result. Other studies conducted in the U.S. and Europe have examined clinical cardiovascular outcomes with varying results (U.S. EPA 2009).

The U.S. EPA 2009 ISA concluded that epidemiologic studies, along with toxicological evidence linking PM exposures to atherosclerosis and other cardiovascular outcomes, provides evidence linking PM to cardiovascular effects and mortality. While the associations between PM and subclinical and clinical measures have inconsistent results, the consistency of the studies linking PM exposures to cardiovascular mortality and the coherence of the toxicological studies provide support for U.S. EPA's causal determination.

### **Long-Term Particulate Matter Exposures and Respiratory Effects**

The U.S. EPA 2009 ISA review determined that the evidence for long-term particulate matter exposures on respiratory effects is likely to be causal. Several studies, including prospective cohort studies, have assessed the effects of long-term particulate matter exposure on respiratory symptoms and lung function changes. Consistent, positive associations have been found with respiratory symptoms, such as bronchitis, poorly controlled asthma, and decreased lung function in children (U.S. EPA 2009; Guarnieri et al. 2014). Since many of the studies of children included survey measures, these studies typically controlled for the potential confounding effect of tobacco smoking by the child and exposure to second-hand smoke at home, and some studies were also able to account for exposure to maternal smoking *in utero*.

The Southern California Children's Health Study established cohorts of school children from 12 Southern California communities, and followed these participants over time. One of the early studies from this cohort reported positive associations of particulate matter with prevalent bronchitis or phlegm among children with asthma. These effects were also associated with NO<sub>2</sub> and acid vapor levels (McConnell et al. 1999). Another study based on this cohort reported a lower rate of growth in lung function in children living in areas with higher levels of particulate pollution (Gauderman et al. 2000). Decreases in lung function growth were associated with PM<sub>10</sub>, PM<sub>2.5</sub>, PM<sub>10-2.5</sub>, acid



vapor, and NO<sub>2</sub>. There was no association with ozone levels. The investigators were not able to identify independent effects of the pollutants but noted that motor vehicle emissions are a major source of the pollutants.

A follow-up study on a second cohort of children confirmed the findings that decreased lung function growth was associated with particulates, nitric oxides, and elemental carbon levels (Gauderman et al. 2002). Elemental carbon is often used as a measure for diesel particulate. Additionally, children who moved to areas with less air pollution were found to show improvement in lung function growth rate, while those who moved to areas with higher PM<sub>10</sub> and NO<sub>2</sub> showed declines in lung function growth rates (Avol et al. 2001). By the time the fourth graders graduated from high school, a significant number showed lower lung function. The risk of lower lung function was about four times higher in children with the highest PM<sub>2.5</sub> exposure when compared to the lowest exposure communities (Gauderman et al. 2004).

A follow-up report from the Children's Health Study assessed whether improving air quality in Southern California over the past decade has led to beneficial changes in health (Gauderman et al. 2015). It was reported that as the levels of nitrogen oxide and fine particulates were reduced as the result of reductions in air pollution emissions, the deficits in lung function growth were also of a smaller magnitude. Recently, the Children's Health Study cohort data were also used to evaluate associations with bronchitic symptoms in children (Berhane et al. 2016). The study found that reductions in NO<sub>x</sub>, ozone, and PM<sub>10</sub> and PM<sub>2.5</sub> were associated with decreases in bronchitic symptoms, with stronger effects observed in children with asthma. These results indicate that improvements in air quality, as measured by fine particulate and nitrogen oxides, are associated with improvements in children's health in Southern California.

A limited number of studies have linked PM exposures to asthma incidence. In an analysis of the Children's Health Study in Southern California, Islam et al. found that while children with better lung function are generally at lower risk of developing asthma, living in an area with long-term average PM<sub>2.5</sub> levels  $\geq 13.7 \mu\text{g}/\text{m}^3$  offset this protective characteristic; in other words, this study related high PM<sub>2.5</sub> levels with new-onset asthma in children (Islam et al. 2007). The U.S. EPA 2009 ISA report also reviewed two European studies that linked PM<sub>2.5</sub> with asthma onset in children (Brauer et al. 2007) and adults (Kunzli et al. 2009). Two recent studies were identified in our literature search: the first study used the Sister Study national cohort and found that a  $3.6 \mu\text{g}/\text{m}^3$  increase in PM<sub>2.5</sub> was associated with a 20 percent increased risk of incident asthma and a 14 percent increase in incident wheeze among adult females (Young et al. 2014); the second study was a study of Medicaid-enrolled children in Harris County, Texas, and found PM<sub>2.5</sub> was associated with new-onset asthma in single-pollutant models (Wendt et al. 2014). However, accounting for the potential effects of other pollutants added substantial uncertainty in the overall effect estimates for PM<sub>2.5</sub>, meaning that it is difficult to distinguish in this study whether the effects are due to PM<sub>2.5</sub> or other pollutant exposures.

The U.S. EPA 2009 ISA also noted that studies from many different locations, including Mexico City, Sweden, and a national cohort in the U.S. provide additional coherent and consistent evidence of respiratory effects associated with PM exposures.

### **Long-Term Particulate Matter Exposures and Emerging Areas of Interest**

Beyond cardiovascular, respiratory and mortality effects, the U.S. EPA 2009 ISA review concluded that the evidence available at the time was suggestive of a causal relationship between long-term exposures to PM and reproductive/developmental effects, as well as cancer. Since the 2009 ISA, there have been several studies conducted that evaluated these health endpoints in relation to PM exposures, as well as studies of metabolic syndrome and neurological health outcomes. Because of the relatively long time gap since the latest ISA for PM, and because the SCAB exceeds the federal standards for PM<sub>2.5</sub>, these health endpoints are discussed briefly here, with a focus on studies conducted since the 2009 ISA, and studies conducted in California or in the SCAB.

#### Cancer

The U.S. EPA 2009 ISA review concluded that existing evidence is suggestive of a link between PM<sub>2.5</sub> and cancer, with studies of lung cancer providing the strongest evidence. More recently, the International Agency for Research on Cancer (IARC) recently designated outdoor air pollution and particulate matter as carcinogenic to humans (Group 1 carcinogens), and a meta-analysis provided quantitative evidence for the associations between particulate matter and lung cancer risk (Hamra et al. 2014; International Agency for Research on Cancer 2015). The IARC review included studies evaluating associations between outdoor air pollution and lung cancer, urinary bladder cancer, breast cancer, leukemia and lymphoma, childhood cancers, and total cancers. Among these cancers, the IARC Working Group concluded that outdoor air pollution and particulate matter cause lung cancer, and that positive associations were observed between outdoor air pollution and urinary bladder cancer. The IARC Working Group also noted that associations with childhood leukemia were suggestive of an association, and, while there were some inconsistencies across studies, an association could not be ruled out. To estimate overall lung cancer risk, the meta-analysis included 14 studies reporting on PM<sub>2.5</sub> and 9 studies reporting on PM<sub>10</sub>; the vast majority of these were cohort studies from North America and Europe. The meta-analysis found positive associations for both PM<sub>10</sub> and PM<sub>2.5</sub> and lung cancer risk, with the PM<sub>2.5</sub> results being more consistent. Additionally, the study analyzed whether the association between PM<sub>2.5</sub> and lung cancer differed by smoking status, and found positive associations for each smoking status group (current smokers, former smokers, and never-smokers).

A recent study from the Adventist Health and Smog Study-2 (AHSMOG-2) cohort in the U.S. and Canada reported that a 10 ug/m<sup>3</sup> increase in ambient PM<sub>2.5</sub> increased the risk of lung cancer incidence by about 40 percent, after accounting for ozone exposures (Gharibvand et al. 2016). Because all participants are non-smokers, with over 80 percent never having smoked, and with the former smokers having an average of 24 years between quitting smoking and being diagnosed with lung cancer, the likelihood of confounding by smoking in this cohort is much lower than in most other

populations. Another recent study conducted in California evaluated air pollution in relation to survival after being diagnosed with lung cancer, and found that patients living in areas with higher NO<sub>2</sub>, PM<sub>2.5</sub> and PM<sub>10</sub> had shorter survival times, particularly for those patients who were diagnosed at earlier stages of lung cancer (Eckel et al. 2016). Few other studies have evaluated air pollution effects on lung cancer survival, so this study represents a relatively newer area of research.

### Reproductive Health Outcomes

The U.S. EPA 2009 ISA review concluded that existing evidence is suggestive of a link between PM<sub>2.5</sub> and reproductive health effects. Numerous studies report evidence indicating that particulate matter exposure during pregnancy may be associated with adverse birth outcomes, with relatively consistent evidence linking PM<sub>2.5</sub> and PM<sub>10</sub> exposures to low birth weight or decreases in birth weight (Bobak et al. 1999; Sram et al. 2005; Stieb et al. 2012). Among the studies reviewed in the 2009 U.S. EPA ISA for particulate matter or in the literature search for more recent and/or local studies, several studies of low birth weight (defined as <2,500g or approximately 5.5 pounds at birth) or reductions in birth weight were conducted in California or in the Southern California region (Basu et al. 2004; Parker et al. 2005; Salam et al. 2005; Wilhelm et al. 2005; Morello-Frosch et al. 2010; Wilhelm et al. 2012; Basu et al. 2014; Laurent et al. 2014). Two of these studies were conducted in Los Angeles County and were published since the last AQMP in 2012, and both examined low birth weight among full-term babies (“term low birth weight”). Laurent et al. reported that a 5.82 µg/m<sup>3</sup> increase in PM<sub>2.5</sub> exposures during pregnancy was linked to a 2.5 percent increased risk of term low birth weight (Laurent et al. 2014). The second study evaluated PM<sub>2.5</sub> exposures by source, and found increased odds of term low birth weight with increased exposure to PM<sub>2.5</sub> from diesel sources, gasoline, geological sources, as well as elemental carbon (Wilhelm et al. 2012). Studies from the U.S., Brazil, Mexico, the Czech Republic, South Korea, Japan, and Taiwan have reported that neonatal and early postnatal exposure to particulate matter may lead to increased infant mortality (U.S. EPA 2009). Among these studies, one was conducted in Southern California, and found increased risks for deaths among infants between one and 12 months old associated with exposures to particulates and other pollutants; however, no effect was seen for neonatal mortality (defined as mortality in the first month after birth) (Ritz et al. 2006). Some newer research has also linked particulate matter exposures to risk of certain birth defects and stillbirth. A California-based study used monitoring station data and traffic density measures to evaluate potential associations with a variety of birth defects in the San Joaquin Valley (Padula et al. 2013a; Padula et al. 2013b; Padula et al. 2013c; Padula et al. 2015). One of these studies reported evidence suggesting that PM<sub>10</sub> and PM<sub>2.5</sub> may increase the risk of certain congenital heart defects (Padula et al. 2013b). For neural tube defects, increased risks were linked to higher exposures to carbon monoxide and nitrogen oxide (Padula et al. 2013a), but higher risks for spina bifida with PM<sub>10</sub> exposures were found only among mothers living in lower socioeconomic status neighborhoods (Padula et al. 2015). An earlier study conducted in Los Angeles County used ambient monitoring data to estimate exposures, and reported increased risk of certain congenital heart defects with higher exposures to carbon monoxide, but not for PM<sub>10</sub>; PM<sub>2.5</sub> was not evaluated in this study (Ritz et al. 2002). A couple of recent studies evaluated PM<sub>2.5</sub> exposures during gestation and risk of stillbirth. A recent study conducted in Ohio used monitoring station data

to evaluate stillbirth risk, and found that higher levels of PM<sub>2.5</sub> exposure in the third trimester was linked to a 42 percent increased risk of stillbirth (DeFranco et al. 2015). A California-based study similarly found an increased risk of stillbirth with higher PM<sub>2.5</sub> exposures averaged over the entire pregnancy, but the association may have been confounded by co-occurring nitrogen dioxide exposures (Green et al. 2015). A third study, conducted in Taiwan, found that higher PM<sub>10</sub> and sulfur dioxide exposures in the first trimester were associated with increased risk of stillbirth among babies who were born preterm; PM<sub>2.5</sub> was not assessed in this study (Hwang et al. 2011).

In the U.S. EPA review, it was noted that stronger associations with birth weight reductions are observed with PM<sub>2.5</sub> compared to PM<sub>10</sub>, and animal toxicological studies provide supportive evidence, although a specific mechanism is not known (U.S. EPA 2009). These results and many other studies provide evidence that fetuses and infants are subgroups affected by particulate matter exposures.

### Neurological Health Outcomes

A 2012 review conducted by a panel of research scientists convened by the National Institute of Environmental Health Sciences identified several studies that reported links between outdoor air pollution and central nervous system effects, such as decreased cognitive function, Alzheimer's disease, Parkinson's disease, and impacts on behavioral testing and development in childhood (Block et al. 2012). Toxicological studies suggest that the damage may be caused through an oxidative stress pathway, and demonstrate that PM can be inhaled into the lungs and translocated to the brain, and that ultrafine particles to reach the brain through the olfactory nerve (Peters et al. 2006). Some more recent studies have evaluated neurological impacts of PM, ranging from studies of older adults to prenatal exposures. The Normative Aging Study evaluated older men in Boston, MA, and reported an association between black carbon (a marker of traffic exhaust) and cognitive function, as measured through cognitive tests (Power et al. 2011). A study conducted in the Los Angeles Basin used monitoring data to evaluate long-term exposures in a middle-aged and older adult population, and reported PM<sub>2.5</sub> exposure was associated with decreased verbal learning (Gatto et al. 2014). A study of school children in Spain reported that children attending schools with higher levels of air pollution, as measured by elemental carbon (a marker of diesel exhaust), NO<sub>2</sub>, and ultrafine particles, experienced smaller growth in several cognitive measures (Sunyer et al. 2015). Three recent studies reported that PM<sub>2.5</sub> exposures during the prenatal period were associated with autism in childhood. One study was conducted in Los Angeles County, and reported that 7 percent increased odds of autism with a 4.68 µg/m<sup>3</sup> increase in PM<sub>2.5</sub>; the effect estimate increased to 15 percent when accounting for ozone in the statistical models (Becerra et al. 2013). A California-based study found that an 8.7 µg/m<sup>3</sup> increase in PM<sub>2.5</sub> during the prenatal period or in the first year of life doubled the odds of autism (Volk et al. 2013). The third study was based on the Nurses' Health Study II cohort, and reported an increased risk of autism with prenatal PM<sub>2.5</sub> exposures, but not with exposures before pregnancy or after delivery (Raz et al. 2015). These studies provide emerging evidence of health effects of air pollution on neurological health outcomes.

### Metabolic Syndrome

Metabolic syndrome, which is the clustering of several known risk factors for cardiovascular disease (Huang 2009), is a relatively new health outcome to be studied in relation to air pollution exposure. The U.S. EPA 2009 ISA reviewed only one epidemiological study and one toxicological study. These studies provided some evidence that particulate matter exposures may be linked to markers of metabolic syndrome, such as insulin resistance, hypertension, high cholesterol, or obesity, or that having a metabolic syndrome may increase susceptibility to the effects of PM<sub>10</sub> exposures on cardiovascular outcomes (U.S. EPA 2009). More recently, a Swiss epidemiological study reported that long-term PM<sub>10</sub> exposures were associated with increased risk of metabolic syndrome (Eze et al. 2015). Two other human studies found that people with metabolic syndrome exposed to particulate matter air pollution experienced cardiovascular effects and worsening insulin resistance (Devlin et al. 2014; Brook et al. 2016). Some recent animal studies have also reported impacts of PM on the development of obesity and metabolic syndrome, and that animals with pre-existing metabolic syndrome may be more sensitive to the cardiovascular effects of PM exposure (Brocato et al. 2014; Wagner et al. 2014; Wei et al. 2016).

### Ultrafine Particles

As noted above, numerous studies have found associations between particulate matter levels and adverse health effects, including mortality, hospital admissions, and respiratory disease symptoms. The vast majority of these studies used particle mass of PM<sub>10</sub>, PM<sub>2.5</sub>, or PM<sub>10-2.5</sub> as the measure of exposure. Some researchers have postulated, however, that ultrafine particles may be responsible for some of the observed associations of particulate matter and health outcomes (Oberdorster et al. 1995; Seaton et al. 1995). Ultrafine particles are typically defined as particles with aerodynamic diameters of less than 0.1  $\mu\text{m}$  or 100 nm. Ultrafine particles are formed as a result of combustion processes as well as secondary atmospheric transformations. Vehicle emissions, especially diesel exhaust, are major sources of ultrafine particles; therefore, proximity to a major roadway is an important factor that affects an individual's exposure to ultrafine particles (Zhu et al. 2002; HEI Review Panel on Ultrafine Particles 2013). There is currently no federal or California standard for ultrafine particles.

U.S. EPA staff has presented conclusions on causal determination of several health effects of ultrafine PM based on a recent review of the available scientific studies (U.S. EPA 2009). These causal determinations are depicted in Table I-9.

**TABLE I-9**

Summary of U.S. EPA's Causal Determination of Ultrafine PM by Exposure Duration and Health Outcome

<b>SHORT-TERM EXPOSURES</b>	
<b>Health Outcome</b>	<b>Causality Determination</b>
Cardiovascular effects	Suggestive of a causal relationship
Respiratory effects	Suggestive of a causal relationship
Central nervous system	Inadequate to infer a causal relationship
Mortality	Inadequate to infer a causal relationship
<b>LONG-TERM EXPOSURES</b>	
<b>Health Outcome</b>	<b>Causality Determination</b>
Cardiovascular effects	Inadequate to infer a causal relationship
Respiratory effects	Inadequate to infer a causal relationship
Mortality	Inadequate to infer a causal relationship
Reproductive and developmental	Inadequate to infer a causal relationship
Cancer, Mutagenicity, Genotoxicity	Inadequate to infer a causal relationship

(From (U.S. EPA 2009) Table 2-4 and Chapters 6 and 7)

In 2013, a review of the health effects of ultrafine particles concluded that current available evidence does not support that exposures to ultrafine particles alone account for the adverse health effects that have been associated with other ambient pollutants such as PM<sub>2.5</sub>, although the report noted several limitations in the exposure data relating to ultrafine particles (HEI Review Panel on Ultrafine Particles 2013). However, a more recent assessment of the studies published since that time suggest that UFP's may be more harmful compared to health compared to PM<sub>10</sub> and PM<sub>2.5</sub> (Li et al. 2016). Several potential mechanisms have been brought forward to suggest that the ultrafine portion may be important in determining the toxicity of ambient particulates, some of which are discussed below.

Smaller particles can also be inhaled deeper into the lungs, although the relationship between deposition fraction and particle size is complex. The ultrafine particles between 20-30 nm generally have higher fractional deposition in the alveolar region of the lung, where air exchange takes place. Because ultrafine particles are cleared from the lung more slowly compared to larger particles, the ultrafine particles can accumulate in the lung tissue where they can also translocate into the blood and to other organs (HEI Review Panel on Ultrafine Particles 2013). Ultrafine particles can also enter the brain tissues through the olfactory nerve (Peters et al. 2006). For a given mass concentration, ultrafine particles have much higher numbers of particles and surface area compared to larger particles. Particles can act as carriers for other adsorbed agents, such as trace metals and organic

compounds; and the larger surface area may transport more of such toxic agents than larger particles. Combined with the slower clearance of UFP's from the alveolar region of the lung, these small particles can deliver a greater amount of toxics to this part of the lung, causing increased inflammation (Li et al. 2016).

Exposures of laboratory animals to ultrafine particles have found cardiovascular and respiratory effects. Using an animal model of atherosclerotic disease, mice exposed to concentrated ultrafine particles (defined as less than 0.18  $\mu\text{m}$ ) near a roadway in Southern California showed larger early atherosclerotic lesions than mice exposed to concentrated PM<sub>2.5</sub> or to filtered air (Araujo et al. 2008). In a mouse allergy model, exposures to concentrated ultrafine particles (less than 0.18  $\mu\text{m}$ ) resulted in a greater response to antigen challenge to ovalbumin (Li et al. 2010), indicating that vehicular traffic exposure could exacerbate allergic inflammation in already-sensitized animals. More specifically, ambient UFP's with a higher polycyclic aromatic hydrocarbon (PAH) content and higher oxidant potential triggered greater allergic inflammation in mice compared to a mixture of fine and ultrafine particles (Li et al. 2009). A related study identified specific proteins that are up-regulated among the exposed mice, which were proteins involved in allergic airway inflammation and immune system response (Kang et al. 2010). These results suggest that UFP's may play a role in the development or exacerbation of asthma, and point to an oxidative stress pathway. Additionally, some experiments using engineered nanoparticles found that the particle exposure led to a suppressed immune response to infections (Li et al. 2016).

Controlled exposures of human volunteers to ultrafine particles either laboratory-generated or as products of combustion, such as diesel exhaust containing particles, have found physiological changes related to vascular effects. Mills et al., for example found exposure to diesel exhaust particulate at 300  $\mu\text{g}/\text{m}^3$  attenuated both acetylcholine and sodium-nitroprusside-induced vasorelaxation (Mills et al. 2011). These exposures were higher than typical ambient concentrations, although the authors state that such concentrations can be found regularly in heavy traffic, occupational settings, and in some of the most polluted cities in the world. This study showed that diesel exhaust particulates had impacts on vascular function while carbon nanoparticles did not change vascular function, providing evidence that is complementary to the epidemiological studies linking particulate matter exposure to cardiovascular outcomes. Several other human exposures studies have reported effects of UFP's on inflammatory markers, lung function, heart rate and heart rate variability, including effects on people with asthma, diabetes, or metabolic syndrome (Li et al. 2016).

There is a lack of long-term studies of human population exposure to ultrafine particles, as there is currently no ultrafine monitoring network in the U.S. As noted above, however, a recent study from California estimated exposures to PM<sub>2.5</sub> and ultrafine particles among members of the California Teachers Study cohort. Positive, statistically significant associations of ischemic heart disease mortality were observed with modeled PM<sub>2.5</sub> and with ultrafine particle mass concentrations derived from chemical transport models using California emissions inventories (Ostro et al. 2015). Other epidemiological studies have reported links between UFP exposures both indoors and

outdoors with decreased microvascular function and increased systemic inflammation in adults (Karottki et al. 2014; Olsen et al. 2014), and with oxidative DNA damage in children (Song et al. 2013).

There have been several cross-sectional epidemiological studies of ultrafine particles, mainly from Europe. Some of these studies found effects on hospital admissions and emergency department visits for respiratory and cardiovascular effects, whereas other studies did not find such effects (U.S. EPA 2009). A recent study conducted in Rochester, NY reported that ambient UFP exposures in the prior week were associated with increased risk of asthma-related medical visits indicative of asthma exacerbation; the study did not find associations with accumulation mode PM, PM<sub>2.5</sub>, black carbon, or sulfur dioxide (Evans et al. 2014). Concentrations of ultrafine particles can vary geographically, and it is not clear how well the central-site monitors used in these studies reflect actual exposures.

Additional discussion on the sources and health effects of ultrafine particles can be found in Chapter 9 of the 2012 AQMP.

## Sensitive Populations for PM-Related Health Effects

Certain populations may be more sensitive to the health effects of particulate air pollution, and evidence to assess susceptibility comes from epidemiological, controlled human exposure, and toxicological studies of PM<sub>2.5</sub> and PM<sub>10</sub> exposures. The U.S. EPA 2009 ISA for PM concluded that there is evidence supporting increased susceptibility to the effects of PM among children (for respiratory effects) and older adults (for cardiovascular effects), individuals with pre-existing cardiovascular or respiratory conditions, individuals with lower socioeconomic status (sometimes assessed using proxy measures such as educational attainment or residential location), and individuals with certain genetic polymorphisms that control antioxidant response, regulate enzyme activity, or regulate procoagulants (U.S. EPA 2009). In addition, there is some limited evidence that additional factors may increase a person's susceptibility to PM health effects, including chronic inflammatory conditions (e.g. diabetes, obesity) and life stage, with pregnant women and fetuses *in utero* being potentially more susceptible. Table I-10 summarizes the U.S. EPA's 2009 ISA assessment of susceptibility factors for particulate matter.



**TABLE I-10**

Summary of Evidence for Potential Increased Susceptibility to PM-Related Health Effects

Assessment of Evidence	Potential At Risk Factor
Increased susceptibility to PM	Older Adults ( $\geq 65$ years) Children ( $< 18$ years) Genetic factors Cardiovascular diseases Respiratory illnesses Socioeconomic status (SES) Educational attainment (surrogate of SES) Residential location (surrogate of SES)
Increased susceptibility to PM, but limited studies available	Pregnancy and developmental effects Diabetes Obesity Health status, e.g. nutrition (surrogate of SES)
Did not increase susceptibility to PM	Gender Race/ethnicity
Did not increase susceptibility to PM, but limited studies available	Respiratory contributions to cardiovascular effects

Adapted From (U.S. EPA 2009) Table 8-2

## Summary - Particulate Matter Health Effects

A considerable body of scientific evidence from epidemiologic, controlled human exposure and toxicological studies support the causal determinations for particulate matter and several categories of health endpoints, with the strongest evidence supporting a causal relationship for PM<sub>2.5</sub> exposures with cardiovascular effects and mortality. Specific cardiovascular effects include cardiovascular deaths, hospital admissions for ischemic heart disease and congestive heart failure, changes in heart rate variability and markers of oxidative stress, and markers of atherosclerosis. The scientific evidence also supported a likely causal relationship for PM<sub>2.5</sub> exposure with respiratory effects, such as hospital admissions for COPD or respiratory infections, asthma development, asthma or allergy exacerbation, lung cancer, impacts on lung function, lung inflammation, oxidative stress, and airway hyperresponsiveness. Both short-term and long-term particulate matter exposures are linked to health effects in humans. Young children, older adults, and people with pre-existing respiratory or cardiovascular health conditions are among those who may be more susceptible to the adverse effects of PM.

## Estimates of the Health Burden of Particulate Matter in the South Coast Air Basin

In terms of estimating health burdens of air pollution exposure, CARB has conducted analyses in the past estimating exposures and quantitative health effects from exposures to particulate matter as well as other pollutants. A recent assessment focused on premature mortality and PM<sub>2.5</sub>, and

estimated the deaths associated with exposures above  $5.8 \mu\text{g}/\text{m}^3$ , which is an estimate of background PM<sub>2.5</sub> (California Air Resources Board 2010a). The analysis used the U.S. EPA's risk assessment methodology for calculating premature mortality and used ambient air quality measurements averaged over a three-year period of 2006-2008. An update to this analysis using ambient air quality data from 2009-2011 indicated that PM<sub>2.5</sub>-related premature deaths in California due to cardiopulmonary causes as 7,200 deaths per year with an uncertainty range of 5,600 – 8,700. Estimates were also made for the California Air Basins. For the South Coast Air Basin, the estimate was 4,000 cardiopulmonary deaths per year with an uncertainty range of 3,200–4,900. These estimates were calculated using the associations of cardiopulmonary mortality and PM<sub>2.5</sub> from the second exposure period from Krewski (Krewski et al. 2009).

Another analysis of health impacts in the South Coast was conducted as part of the Socioeconomic Report for the 2012 AQMP. The analysis estimated the anticipated costs and benefits of adopting the measures in the Final 2012 AQMP, which included the projected public health benefits associated with lower PM<sub>2.5</sub> concentrations as a result of the 2012 plan (South Coast Air Quality Management District 2012). Based on that analysis, the projected annual number of averted deaths due to PM<sub>2.5</sub> reductions from the 2012 AQMP was 668 deaths in year 2014, and 275 deaths in year 2023. In addition, estimated numbers of health conditions prevented per year due to the 2012 AQMP were shown for several other health endpoints, including respiratory and cardiovascular outcomes. The estimates of cases averted in year 2014 were 597 cases of acute bronchitis, 29 to 261 non-fatal heart attacks, 18,384 person-days for lower and upper respiratory symptoms, 153 respiratory emergency room visits, 151 hospital admissions, 287,447 person-days of minor restricted activity, 48,805 work loss days, and 26,910 person-days of asthma attacks. Importantly, these estimates of prevented mortality and morbidity should not be compared to the estimates of deaths attributable to PM<sub>2.5</sub> conducted by CARB, because these analyses are intended to answer different questions. The SCAQMD estimates address the question of “how many cases are averted due to the adoption of the 2012 AQMP?” while the CARB estimates address the question of “how many deaths are attributable to PM<sub>2.5</sub> exposures above  $5.8 \mu\text{g}/\text{m}^3$ ?”. Both analyses provide important information regarding the health impacts of PM<sub>2.5</sub>.

## NITROGEN DIOXIDE

Nitrogen dioxide (NO<sub>2</sub>) is a gaseous air pollutant that serves as an indicator of gaseous oxides of nitrogen, such as nitric oxide (NO) and other related compounds (NO<sub>x</sub>). These gases can undergo photochemical reactions to form ground-level ozone, and are important contributors to ozone pollution levels in the SCAB. Evidence of the health effects of NO<sub>2</sub> is derived from human and animal studies, which link NO<sub>2</sub> with respiratory effects such as decreased lung function and increases in airway responsiveness and pulmonary inflammation (U.S. EPA 2016). The U.S. EPA in 2010 retained the existing standards of 53 ppb for NO<sub>2</sub> averaged over one year, and adopted a new short-term standard of 100 ppb (0.1 ppm) averaged over one hour. The standard was designed to protect against increases in airway reactivity in individuals with asthma based on controlled exposure studies, as well as respiratory symptoms observed in epidemiological studies. The revised standard also requires additional monitoring for NO<sub>2</sub> near roadways.

In the current U.S. EPA Integrated Science Assessment for Nitrogen Oxides (U.S. EPA 2016), the staff conclusion for causal relationships between exposures and health effects are shown in the following table.

**TABLE I-11**

Summary of U.S. EPA's Causal Determination for Health Effects of Nitrogen Dioxide

<b>SHORT-TERM EXPOSURES</b>	
<b>Health Outcome</b>	<b>Causality Determination</b>
Respiratory effects	Causal relationship
Cardiovascular and related metabolic effects	Suggestive of a causal relationship
Total mortality	Suggestive of a causal relationship
<b>LONG-TERM EXPOSURES</b>	
<b>Health Outcome</b>	<b>Causality Determination</b>
Respiratory effects	Likely to be a causal relationship
Cardiovascular and related metabolic effects	Suggestive of a causal relationship
Reproductive and developmental effects	Fertility, Reproduction, and Pregnancy: Inadequate to infer a causal relationship Birth Outcomes: Suggestive of a causal relationship Postnatal Development: Inadequate to infer a causal relationship
Total Mortality	Suggestive of a causal relationship
Cancer	Suggestive of a causal relationship

(From (U.S. EPA 2016), Table ES-1)

Since the previous U.S. EPA Integrated Science Assessment (ISA) for Nitrogen Oxides from 2008, the causal determination for short-term and long-term respiratory effects have been updated in the 2016 ISA to reflect the stronger evidence now available pointing to a causal or likely causal relationship. For non-respiratory outcomes, the U.S. EPA also updated their assessment of the weight of evidence to show that the evidence for several short- and long-term outcomes is suggestive, but not sufficient to infer a causal relationship. Evidence for low-level nitrogen dioxide (NO<sub>2</sub>) exposure effects is derived from laboratory studies of asthmatics and from epidemiological studies. Additional evidence is derived from animal studies. In the 2016 ISA, the U.S. EPA cited the coherence of the results from a variety of studies, and a plausible biological mechanism (whereby NO<sub>2</sub> reacts with the respiratory lining and forms secondary oxidation products that increase airway responsiveness and allergic

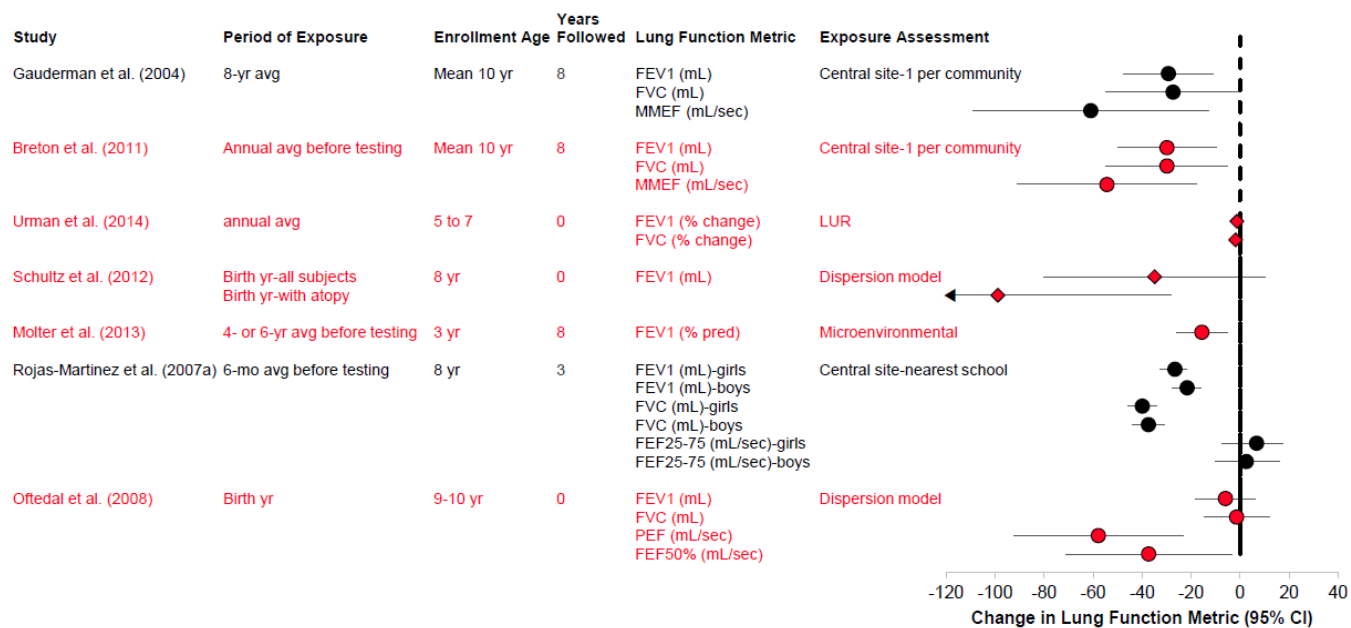
inflammation) to support the determination of a causal relationship between short-term NO<sub>2</sub> exposures and asthma exacerbations (“asthma attacks”). The long-term link with respiratory outcomes was strengthened by recent experimental and epidemiological studies, and the strongest evidence available is from studies of asthma development.

Several studies related to outdoor exposure have found health effects associated with ambient NO<sub>2</sub> levels, including respiratory symptoms, respiratory illness, decreased lung function, pulmonary inflammation, increased emergency room visits for asthma, and cardiopulmonary mortality. However, since traffic exhaust is an important source of NO<sub>2</sub> and several other pollutants, such as particulate matter, exposure generally occurs in the presence of other pollutants, making it more difficult for these studies to distinguish the specific role of NO<sub>2</sub> in causing effects independent of other pollutants. However, studies linking NO<sub>2</sub> to asthma exacerbations and human experimental studies provided support for the U.S. EPA determination that this causal relationship exists for short-term NO<sub>2</sub> exposures independent of other traffic-related pollutants (U.S. EPA 2016). The report also concludes that epidemiological studies do not rule out the possible influence of other traffic-related pollutants on the observed health effects.

The Children’s Health Study in Southern California has evaluated a variety of health endpoints in relation to air pollution exposures, including lung function, lung development, school absences, and asthma. The study found associations between long-term exposure to air pollution, including NO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>, and respiratory symptoms in asthmatic children (McConnell et al. 1999). Particles and NO<sub>2</sub> levels were correlated, and independent effects of individual pollutants could not be discerned. A subsequent analysis using more refined exposure estimation methods indicated consistent associations between long-term NO<sub>2</sub> exposures and respiratory symptoms in children with asthma (McConnell et al. 2003).

Ambient levels of NO<sub>2</sub> were also associated with a decrease in lung function growth in a group of children followed for eight years, including children with no history of asthma. In addition to NO<sub>2</sub>, the decreased growth was also associated with particulate matter and airborne acids. The study authors postulated this may be a result of a package of pollutants from traffic sources (Gauderman et al. 2004).

A number of studies have since reported deficits in lung function associated with nitrogen oxides exposures. Examples are shown in Figure I-8.



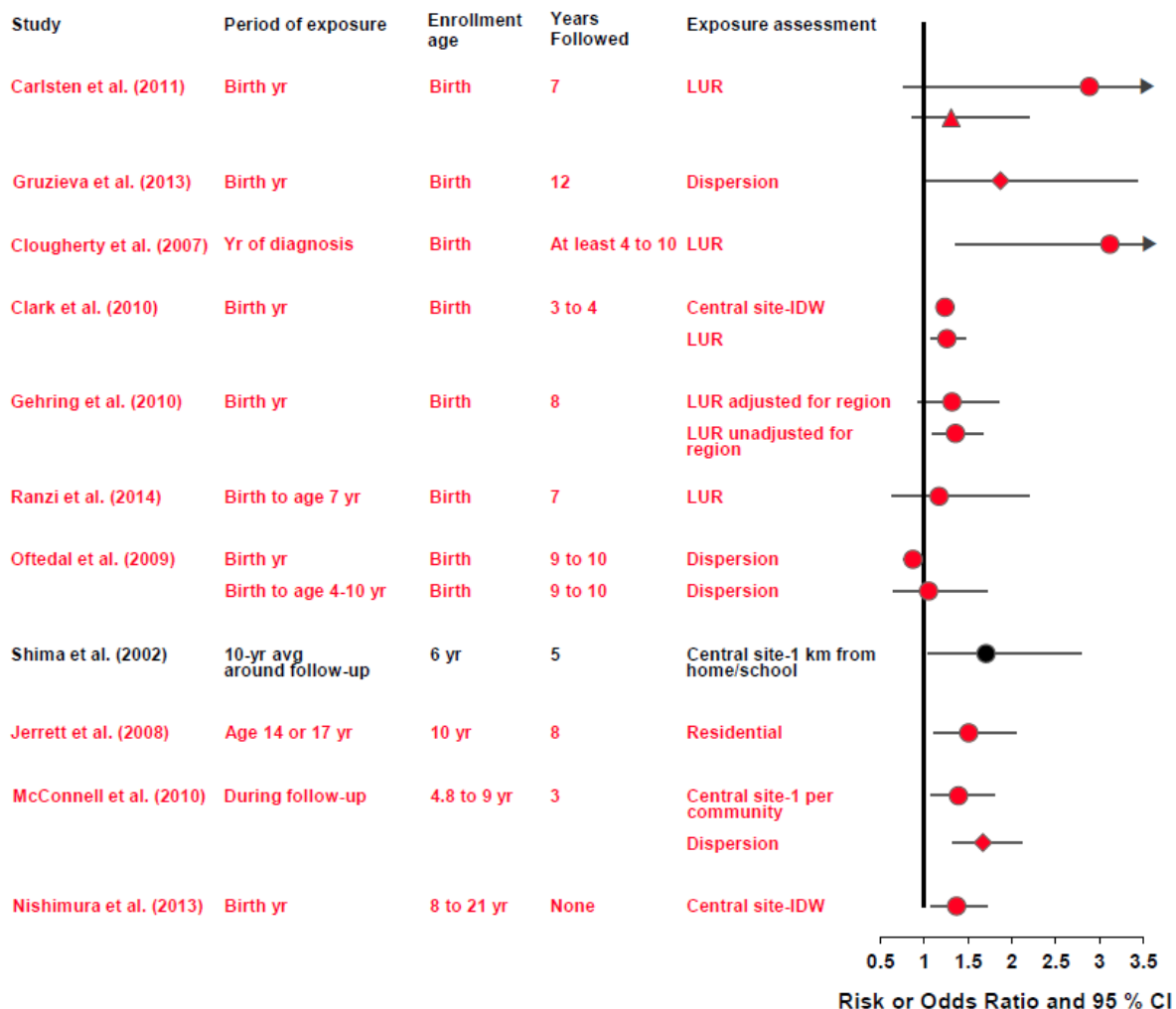
Note: Studies in red are recent studies. Studies in black were included in the 2008 ISA for Oxides of Nitrogen. Circles = NO<sub>2</sub>; Diamonds = NO<sub>x</sub>. All mean changes in this plot are standardized to a 10-ppb increase in NO<sub>2</sub> and a 20-ppb increase in NO<sub>x</sub> concentration. Effect estimates from studies measuring NO<sub>x</sub> in µg/m<sub>3</sub> (Schultz et al., 2012) have not been standardized.

**FIGURE I-8**

Associations of nitrogen dioxide (NO<sub>2</sub>) or the sum of nitric oxide and NO<sub>2</sub> (NO<sub>x</sub>) with lung function indices from prospective studies of children (From (U.S. EPA 2016), Figure 6-5).

A follow-up report from the Children’s Health Study has assessed whether improving air quality in Southern California over the past several decades has led to beneficial changes in health among children (Gauderman et al. 2015). It was reported that as the levels of nitrogen oxide and fine particulates came down as the result of air pollution emissions reductions, the deficits in lung function growth were also of a smaller magnitude. Such improvements were observed in children with asthma as well as in those without asthma. These results indicate that improvements in air quality are associated with improvements in children’s health.

In recent years, the most compelling evidence of long-term effects of NO<sub>2</sub> has been from prospective cohort studies that link NO<sub>2</sub> exposures to the development of asthma, primarily in children. The U.S. EPA included several recent studies in their review, as shown in the Figure I-9. The vast majority of these studies found that higher NO<sub>2</sub> exposures were linked to an increased risk or odds of developing asthma among children.



Effect estimates are standardized to a 10-ppb increase in NO<sub>2</sub>, with the exception of Gruzieva et al. (2013) who examined NO<sub>x</sub> in µg/m<sup>3</sup> and Ofstedal et al (2009) who did not report increments for the effect estimates for the birth to age 4 years or birth to age 10 years exposure periods. Note: Black symbols = studies evaluated in the 2008 Integrated Science Assessment for Oxides of Nitrogen; Red symbols = recent studies. Circles=NO<sub>2</sub>; triangles=NO; diamonds=NO<sub>x</sub>.

**FIGURE I-9**

Associations of ambient nitrogen dioxide (NO<sub>2</sub>) concentrations with asthma incidence in longitudinal cohort studies of children (From (U.S. EPA 2016), Figure 6-1).

Among the studies of childhood asthma incidence reviewed in the 2016 U.S. EPA ISA for Oxides of Nitrogen, two studies were conducted in Southern California. Both studies were based on the Children's Health Study cohort, but one study used a smaller subset of the cohort and estimated NO<sub>2</sub> exposures using monitors at the children's homes (Jerrett et al. 2008). The second study examined over 2000 children and used data from air monitoring stations as well as modeled NO<sub>2</sub> levels to estimate exposures (McConnell et al. 2010). Both studies found a positive association between NO<sub>2</sub> exposures and the onset of asthma in these children, however, because NO<sub>2</sub> is often strongly

correlated with PM<sub>2.5</sub> and other components of traffic-related air pollution, it is possible that the effects observed are due to some other component of traffic exhaust for which NO<sub>2</sub> serves as a proxy measure. The consistency of the effects found linking NO<sub>2</sub> exposure and asthma development in children, the use of prospective longitudinal study designs following children for several years, and the use of several different methods to estimate exposures are noted strengths of such studies. Experimental studies have found that NO<sub>2</sub> exposures increase responsiveness of airways, pulmonary inflammation, and oxidative stress, and can lead to the development of allergic responses. These biological responses provide evidence of a plausible mechanism for NO<sub>2</sub> to cause asthma.

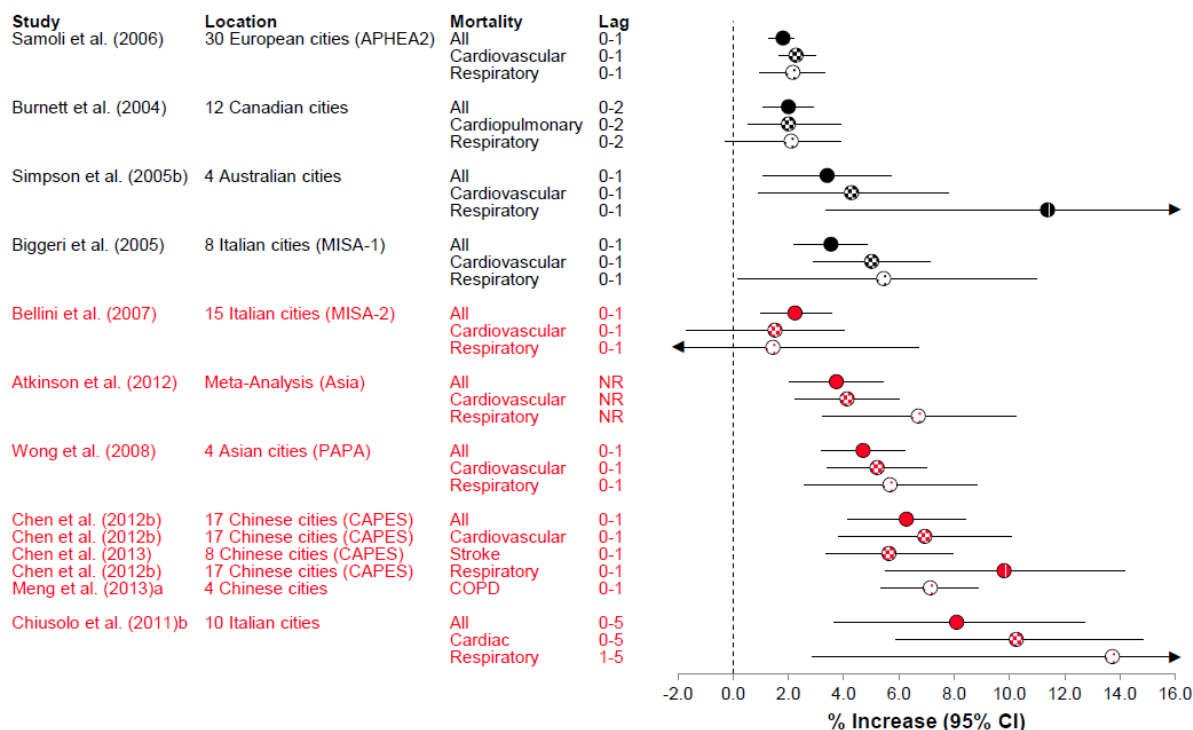
Results from controlled exposure studies of asthmatics demonstrate an increase in the tendency of airways to contract in response to a chemical stimulus (airway responsiveness) or after inhaled allergens (U.S. EPA 2016). Effects were observed among adult volunteers with asthma when exposed to 100 ppb NO<sub>2</sub> for 60 minutes and to 200-300 ppb for 30 minutes, with approximately 70 percent of study participants experiencing an increase in airway responsiveness. A similar response was reported in some studies with healthy subjects at higher levels of exposure (1.5 - 2.0 ppm), although these changes in healthy adults are likely of little or no clinical significance. Increased airway responsiveness among people with asthma can lead to worse symptoms and reduced lung function. Mixed results have been reported from controlled human exposure studies of people with chronic obstructive lung disease, with some studies reporting no change in symptom score while other studies reporting increased symptom scores when participants were exposed to NO<sub>2</sub> while exercising (U.S. EPA 2016).

Short-term controlled studies of rats exposed to NO<sub>2</sub> over a period of several hours indicate cellular changes associated with allergic and inflammatory responses that can lead to liver damage and reduced hepatic function. Rodent models exposed to NO<sub>2</sub> repeatedly for 4 to 14 days demonstrated increased airway responsiveness with high levels of exposure (4000 ppb). Animal studies also provide evidence that NO<sub>2</sub> exposures have negative effects on the immune system, and therefore increase the host's susceptibility to respiratory infections. Epidemiological studies showing associations between NO<sub>2</sub> levels and hospital admissions for respiratory infections also support such a link (U.S. EPA 2016).

Several epidemiological studies conducted in California have examined associations between NO<sub>2</sub> exposures and other health effects, including some recent studies evaluating cardiovascular effects (Coogan et al. 2012; Bartell et al. 2013; Wittkopp et al. 2013), mortality (Lipsett et al. 2011; Bartell et al. 2013; Jerrett et al. 2013), birth outcomes (Ghosh et al. 2012; Laurent et al. 2014; Padula et al. 2014; Ritz et al. 2014; Green et al. 2015), and cancer (Ghosh et al. 2013). Many studies conducted in other geographic areas have also found links with these health outcomes, and the latest assessment by U.S. EPA is that the existing studies are suggestive of a causal relationship for some of these endpoints or inadequate to infer a causal relationship for other endpoints (U.S. EPA 2016). In addition, some of the newer outcomes evaluated in relation to NO<sub>2</sub> exposures include neurological outcomes such as Parkinson's disease (Ritz et al. 2016), Alzheimer's disease (Oudin et al. 2016), and autism (Becerra et al. 2013; Volk et al. 2013), as well as metabolic diseases such as diabetes and obesity (Coogan et al. 2012; Robledo et al. 2015; White et al. 2016). However, many of these studies

use NO<sub>2</sub> exposures as a proxy measure for traffic-related air pollutants, and do not aim to identify a specific pollutant within the mix of pollutants from this source. Thus, there is uncertainty on whether NO<sub>2</sub> exposure has independent relationships with non-respiratory related health effects, or whether NO<sub>2</sub> is simply a marker of near-road air pollution exposure, which includes a mixture of air pollutants, including some air toxics.

Examples of studies reporting an association of mortality with short-term NO<sub>2</sub> exposures are shown in the figure below.



Note: Black symbols = multicity studies evaluated in the 2008 Integrated Science Assessment for Oxides of Nitrogen; Red symbols = recent studies. Filled circle = total mortality; Crosshatch = cardiovascular mortality; Vertical lines = respiratory mortality.

**FIGURE I-10**

Percentage increase in total, cardiovascular, and respiratory mortality from multi-city studies for a 20-ppb increase in 24-hour average or 30-ppb increase in one-hour maximum nitrogen dioxide concentrations (From (U.S. EPA 2016), Figure 5-23).

## SULFUR DIOXIDE

Sulfur dioxide (SO<sub>2</sub>) is a gaseous air pollutant that has been linked to a variety of respiratory effects, such as decreased lung function and increased airway resistance. Controlled laboratory studies involving human volunteers have clearly identified asthmatics as a very sensitive group to the effects of ambient sulfur dioxide (SO<sub>2</sub>) exposures. Healthy subjects have failed to demonstrate any short-term respiratory functional changes at exposure levels up to 1.0 ppm over 1-3 hours. In exercising asthmatics, brief exposure (5-10 minutes) to SO<sub>2</sub> at levels between 0.2-0.6 ppm can result in increases in airway resistance and decreases in breathing capacity. The response to SO<sub>2</sub> inhalation is



observable within two minutes of exposure, increases further with continuing exposure up to five minutes, then remains relatively steady as exposure continues. SO<sub>2</sub> exposure is generally not associated with any delayed reactions or repetitive asthmatic attacks (U.S. EPA 2008). In 2010, the U.S. EPA SO<sub>2</sub> air quality standard was set at 75 ppb (0.075 ppm) averaged over one hour to protect against acute asthma attacks in sensitive individuals.

The EPA assessment based on the 2008 Integrated Science Assessment for Sulfur Oxides is shown in the table below (U.S. EPA 2008). The U.S. EPA recently released a draft of the revised ISA for SO<sub>2</sub> (U.S. EPA 2015a) which evaluates recent evidence assessing links to mortality and cardiovascular, respiratory, carcinogenic, and reproductive effects (Brunekreef et al. 2009; Hart et al. 2011; Pascal et al. 2013; Chen et al. 2014; Gianicolo et al. 2014; Milojevic et al. 2014; Moridi et al. 2014; Stingone et al. 2014; Straney et al. 2014; Wang et al. 2014; Winqvist et al. 2014; Yang et al. 2014; Ancona et al. 2015; Green et al. 2015; Rich et al. 2015; Shah et al. 2015; Yorifuji et al. 2015).

**TABLE I-12**

Summary of U.S. EPA’s Causal Determinations for Health Effects of Sulfur Oxides

<b>SHORT-TERM EXPOSURES</b>	
<b>Health Outcome</b>	<b>Causality Determination</b>
Respiratory morbidity	Causal relationship
Cardiovascular morbidity	Inadequate to infer a causal relationship
Mortality	Suggestive of a causal relationship
<b>LONG-TERM EXPOSURES</b>	
<b>Health Outcome</b>	<b>Causality Determination</b>
Respiratory morbidity	Inadequate to infer a causal relationship
Carcinogenic effects	Inadequate to infer a causal relationship
Prenatal and neonatal outcomes	Inadequate to infer a causal relationship
Mortality	Inadequate to infer a causal relationship

(From (U.S. EPA 2008) Chapter 3)

In epidemiologic studies of children and adults, associations of short-term variations in SO<sub>2</sub> levels with increases in respiratory symptoms, emergency department visits, and hospital admissions for respiratory-related causes have been reported. There is uncertainty as to whether SO<sub>2</sub> is associated with the effects or whether other co-occurring pollutants may explain the observed effects, although some studies indicated that the SO<sub>2</sub> effects remained even after accounting for the effects of other pollutants, including PM<sub>2.5</sub>. Coupled with the human clinical studies, these data suggest that SO<sub>2</sub> can trigger asthmatic episodes in individuals with pre-existing asthma (U.S. EPA 2008).

Animal studies have shown SO<sub>2</sub> effects on pulmonary inflammation with acute exposure at concentrations consistent with ambient SO<sub>2</sub> levels. Toxicological studies using animals found that repeated exposures to concentrations of SO<sub>2</sub> as low as 0.1 ppm promoted allergic sensitization and airway inflammation. Such evidence, combined with human clinical studies and epidemiological studies in people with asthma support the U.S. EPA determination of a causal relationship between short-term SO<sub>2</sub> exposure and respiratory morbidity. One of these studies was conducted in the Los Angeles area, and found that higher ambient SO<sub>2</sub> levels were associated with increased odds of asthma symptoms among Hispanic children with asthma (Delfino et al. 2003).

Some epidemiological studies indicate that the cardiovascular mortality effects associated with short-term exposures to ambient SO<sub>2</sub> were generally reduced when accounting for other pollutants, although the evidence is still suggestive of a causal relationship. Few epidemiological studies are available to assess the potential confounding effects of other co-occurring pollutants in studies of long-term effects. For example, there is some evidence that sulfates, which are formed when SO<sub>2</sub> oxidizes rapidly in the atmosphere, may be associated with lung function changes, although the evidence is not consistent (Reiss et al. 2007). Sulfates are positively correlated with SO<sub>2</sub> levels, so it is difficult to distinguish the effect of one individual pollutant. Based on a level determined necessary to protect the most sensitive individuals, the California Air Resources Board (CARB) in 1976 adopted a standard of 25 µg/m<sup>3</sup> (24-hour average) for sulfates. There is no federal air quality standard for sulfates.

## CARBON MONOXIDE

Carbon monoxide (CO) is a gaseous air pollutant that has a high affinity to bond with oxygen-carrying proteins (hemoglobin and myoglobin). The resulting reduction in oxygen supply in the bloodstream is responsible for the toxic effects of CO, which are typically manifested in the oxygen-sensitive organ systems. The effects have been studied in controlled laboratory environments involving exposure of humans and animals to CO, as well as in population-based studies of ambient CO exposure effects. People with deficient blood supply to the heart (ischemic heart disease) are known to be susceptible to the effects of CO. Protection of this group is the basis of the existing National Ambient Air Quality Standards for CO at 35 ppm for one hour and 9 ppm averaged over eight hours. The health effects of ambient CO have been recently reviewed by U.S. EPA, with the strongest evidence supporting a likely causal link between short-term CO exposures and cardiovascular outcomes, although studies have linked both short-term and long-term CO exposures to several other health outcomes (Table I-13) (U.S. EPA 2010).

**TABLE I-13**

Summary of U.S. EPA's Causal Determinations for Health Effects of Carbon Monoxide

<b>SHORT-TERM EXPOSURES</b>	
<b>Health Outcome</b>	<b>Causality Determination</b>
Cardiovascular morbidity	Likely to be a causal relationship
Central nervous system	Suggestive of a causal relationship
Respiratory morbidity	Suggestive of a causal relationship
Mortality	Suggestive of a causal relationship
<b>LONG-TERM EXPOSURES</b>	
<b>Health Outcome</b>	<b>Causality Determination</b>
Cardiovascular morbidity	Inadequate to infer a causal relationship
Central nervous system	Suggestive of a causal relationship
Birth outcomes and developmental effects	Suggestive of a causal relationship
Respiratory morbidity	Inadequate to infer a causal relationship
Mortality	Not likely to be a causal relationship

(From (U.S. EPA 2010) Table 2-1)

Inhaled CO has no known direct toxic effect on lungs but rather exerts its effects by interfering with oxygen transport—through the formation of carboxyhemoglobin (COHb, a chemical complex of CO and hemoglobin) ), which reduces the amount of oxygen the blood can carry to the tissues. Exposure to CO is often evaluated in terms of COHb levels in blood, measured as percentage of total hemoglobin bound to CO. Endogenous COHb is estimated to be <1 percent in healthy individuals, but COHb levels are sensitive to health status and metabolic state, with higher levels among smokers and persons with inflammatory diseases. Estimates based on a large prospective study of adults conducted in the 1970s showed a dose-response relationship between the average number of cigarettes smoked per day and the COHb concentrations (never smokers: 1.59±1.72 percent, former smokers: 1.96±1.87 percent, 1-5 cigarettes/day: 2.31±1.94 percent, 6–14 cigarettes/day: 4.39±2.48 percent, 15–24 cigarettes/day: 5.68±2.64 percent, ≥25 cigarettes/day: 6.02±2.86 percent) (Hart et al. 2006).

Under controlled laboratory conditions, healthy subjects exposed to CO sufficient to result in 5 percent COHb levels exhibited reduced duration of maximal exercise performance due to the inability to deliver sufficient oxygen to the heart and other muscles. Studies involving subjects with coronary artery disease who engaged in exercise during CO exposures have shown that COHb levels as low as

2.4 percent can lead to earlier onset of electrocardiograph changes indicative of deficiency of oxygen supply to the heart. Other effects of inadequate oxygen delivery to the body tissues include earlier onset of chest pain, increase in the duration of chest pain, headache, confusion and drowsiness (U.S. EPA 2000).

A number of epidemiological studies have found associations between short-term ambient CO levels and increased hospital admissions and emergency department visits for ischemic heart disease, including myocardial infarction (U.S. EPA 2010). In studies reporting results stratified by age and sex, larger effects were generally observed among older adults and among males. Examples of such studies, including information on number of days of lag time between exposure and hospital admissions for key cardiovascular outcomes, are shown in the figure below.

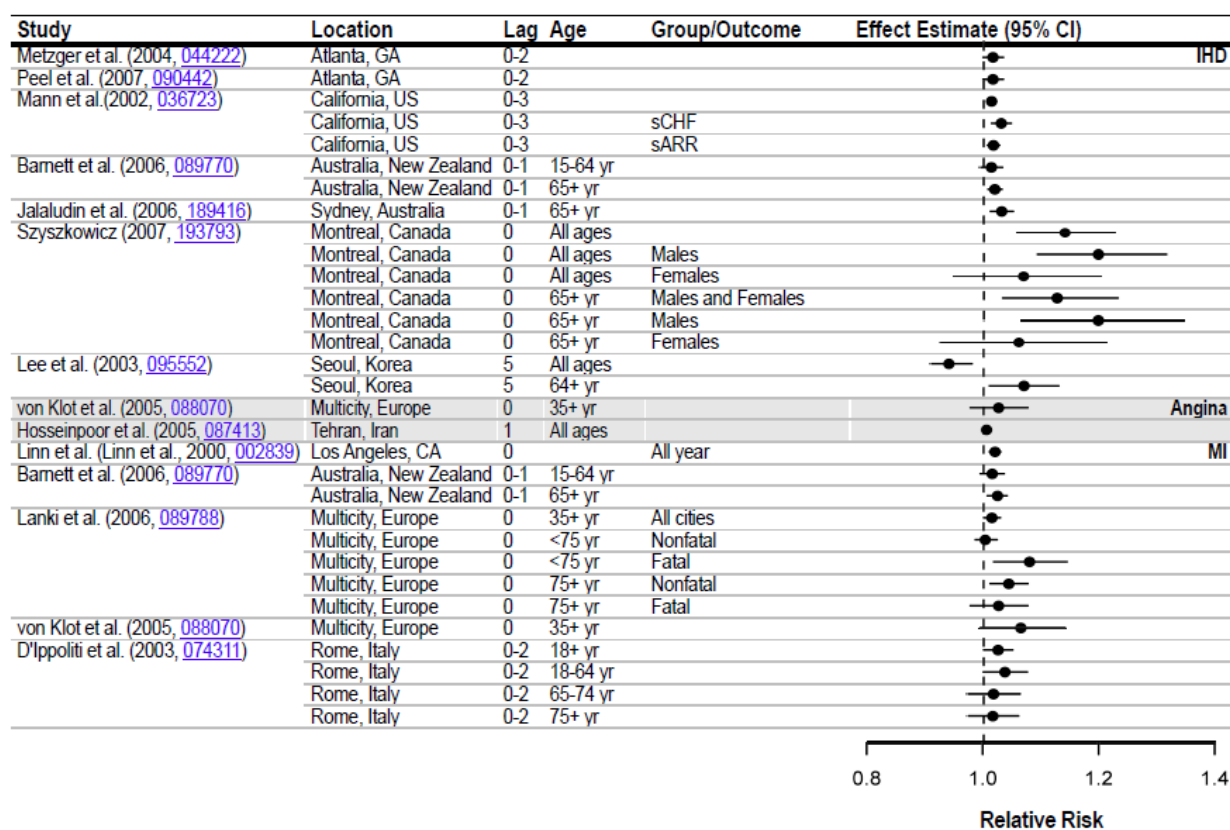


FIGURE I-11

Effect estimates (95 percent confidence intervals) associated with hospital admissions for various forms of heart disease. Effect estimates have been standardized to a 1 ppm increase in ambient CO for 1-h max CO concentrations, 0.75 ppm for 8-h max CO concentrations, and 0.5 ppm for 24-h average CO concentrations (From (U.S. EPA 2010), Figure 5-2). Lag time is the time between the exposure and the outcome measured. The closed circle on the diagram indicates the effect estimate, while the bar indicates the 95 percent confidence interval.

Research studies have also evaluated ambient CO exposures in relation to reproductive health outcomes. Epidemiological studies conducted in Southern California have reported an association

between with CO exposure during pregnancy and increases in pre-term births (Ritz et al. 2000; Wilhelm et al. 2005; Ritz et al. 2007). The increases in the pre-term births were also associated with PM10 or PM2.5 levels. There are very few studies examining CO exposure and birth defects, but one Southern California study found increased risks for cardiac-related birth defects with carbon monoxide exposure in the second month of pregnancy (Ritz et al. 2002). Toxicological studies in laboratory animals with higher than ambient levels of CO have also reported decrements in birth weight and prenatal growth, as well as impaired neurobehavior in the offspring of exposed animals (U.S. EPA 2010). The U.S. EPA concluded in their most recent review that the evidence linking long-term CO exposures with reproductive health outcomes was suggestive of a causal relationship.

## LEAD

Lead (Pb) is a toxic air contaminant that is recognized to exert an array of deleterious effects on multiple organ systems. There are a number of potential public health effects at low level exposures, and there is no recognized lower threshold for health effects (U.S. EPA 2013a). The health implications are generally indexed by blood lead levels which are related to lead exposures both from inhalation as well as from ingestion. Effects include impacts on population IQ as well as heart disease and kidney disease. The initial air quality standard for lead was established by U.S. EPA in 1978 at a level of 1.5  $\mu\text{g}/\text{m}^3$  averaged over a calendar quarter. U.S. EPA revised the NAAQS for lead in 2008 to a level of 0.15  $\mu\text{g}/\text{m}^3$  averaged over a rolling three-month period to protect against lead toxicity. The SCAB's attainment status for lead is described in the draft 2016 AQMP Chapter 2.

The U.S. EPA has recently reviewed the health effects of ambient lead exposures in conjunction with an Integrated Science Assessment and a review of the NAAQS for lead (U.S. EPA 2013a; U.S. EPA 2015c). Lead can accumulate and be stored in the bone, and this lead in bone can be released into the blood when the bone is metabolized, which happens naturally and continuously. Blood lead is the most common measure of lead exposure, and it represents recent exposure and may be an indicator of total body burden of lead (U.S. EPA 2013a). The following table gives the summary of causality conclusions from the U.S. EPA review, which illustrates the wide range of health effects associated with lead exposure.

TABLE I-14

Summary of U.S. EPA's Causal Determinations for Health Effects of Lead

HEALTH OUTCOME	CAUSALITY DETERMINATION
<b>Children - Nervous System Effects</b>	
Cognitive Function Decrements	Causal relationship
Externalizing Behaviors: Attention, Impulsivity and Hyperactivity	Causal relationship
Externalizing Behaviors: Conduct Disorders in Children and Young Adults	Likely to be a causal relationship
Internalizing Behaviors	Likely to be a causal relationship
Auditory Function Decrements	Likely to be a causal relationship
Visual Function Decrements	Inadequate to infer a causal relationship
Motor Function Deficits	Likely to be a causal relationship
<b>Adults – Nervous System Effects</b>	
Cognitive Function Decrements	Likely to be a causal relationship
Psychopathological Effects	Likely to be a causal relationship
<b>Cardiovascular effects</b>	
Hypertension	Causal relationship
Subclinical Atherosclerosis	Suggestive of a causal relationship
Coronary Heart Disease	Causal relationship
Cerebrovascular Disease	Inadequate to infer a causal relationship
<b>Renal Effects</b>	
Reduced Kidney Function	Suggestive of a causal relationship
<b>Immune System Effects</b>	
Atopic and Inflammatory Response	Likely to be a causal relationship
Decreased Host Resistance	Likely to be a causal relationship
Autoimmunity	Inadequate to infer a causal relationship
<b>Hematologic Effects</b>	
Decreased Red Blood Cell Survival and Function	Causal relationship
Altered Heme Synthesis	Causal relationship
<b>Reproductive and Developmental Effects</b>	
Development	Causal relationship
Birth Outcomes (low birth weight, spontaneous abortion)	Suggestive of a causal relationship
Male Reproductive Function	Causal relationship
Female Reproductive Function	Suggestive of a causal relationship
<b>Cancer</b>	
Cancer	Likely to be a causal relationship

(From (U.S. EPA 2013a) Table ES-1)

Children appear to be sensitive to the neurological toxicity of lead, with effects observed at blood lead concentration ranges of 2–8 µg/dL. No clear threshold has been established for such effects. According to the U.S. EPA review, the most important effects observed are neurotoxic effects in children and cardiovascular effects in adults. The effects in children include impacts on intellectual

attainment and school performance. Figure I-12 provides a summary of the lowest levels of blood lead that have been associated with certain neurological, hematological and immune effects in children.

Lowest Observed Effect Blood Lead Level	Neurological Effects	Hematological Effects	Immune Effects
30 µg/dL		Increased urinary δ-aminolevulinic acid	
15 µg/dL	Behavioral disturbances (e.g., inattention, delinquency)  Altered electrophysiological responses	Erythrocyte protoporphyrin (EP) elevation	
10 µg/dL	Effects on neuromotor function  CNS cognitive effects (e.g., IQ deficits)	Inhibition of δ-aminolevulinic acid dehydratase (ALAD)  ↓ Pyrimidine-5'-nucleotidase (Py5N) activity inhibition	Effects on humoral (↑ serum IgE) and cell-mediated (↓ T-cell abundance) immunity
5 µg/dL	↓ (???)	↓ (???)	
0 µg/dL			

Note: Arrows depict cases where weight of overall evidence strongly substantiates likely occurrence of type of effect in association with blood-Pb concentrations in range of 5-10 µg/dL, or possibly lower, as implied by (???). Although no evident threshold has yet been clearly established for those effects, the existence of such effects at still lower blood-Pb levels cannot be ruled out based on available data.

Source: Adapted/updated from Table 1-17 of U.S. Environmental Protection Agency (1986a).

**FIGURE I-12**

Summary of Lowest Observed Effect Levels for Key Lead-Induced Health Effects in Children (From (U.S. EPA 2007), Table 3-1)

Figures I-12 and I-13, taken from the U.S. EPA review (U.S. EPA 2007), depict the health effects of lead in relation to blood levels. In the figure, the question marks indicate that there are no demonstrated threshold blood lead levels for health effects. The Centers for Disease Control (CDC) has recently revised their lead hazard information and replaced their level of concern for adverse effects of 10 µg/dL blood lead level with a childhood blood lead level reference value of 5 µg/dL to identify children and environments associated with lead-exposure hazards (Centers for Disease Control and Prevention 2016).

Figure I-13 provides a summary of the lowest levels of blood lead that have been associated with key health effects in adults. For adults, evidence supports a causal relationship between lead and increased blood pressure and hypertension, as well as coronary heart disease (myocardial infarction, ischemic heart disease, and heart rate variability). Other health effects among adults are also relatively high on the causal scale, including neurological, hematological, and renal effects.

Lowest Observed Effect Blood Lead Level	Neurological Effects	Hematological Effects	Cardiovascular Effects	Renal Effects
30 µg/dL	Peripheral sensory nerve impairment	Erythrocyte protoporphyrin (EP) elevation in males		Impaired Renal Tubular Function
20 µg/dL	Cognitive impairment			
15 µg/dL	Postural sway	Erythrocyte protoporphyrin (EP) elevation in females  Increased urinary δ-aminolevulinic acid		
10 µg/dL		Inhibition of δ-aminolevulinic acid dehydratase (ALAD)	Elevated blood pressure	
5 µg/dL			↓ (???)	Elevated serum creatine (↓ creatine clearance)
0 µg/dL				

Note: Arrows depict cases where weight of overall evidence strongly substantiates likely occurrence of type of effect in association with blood-Pb concentrations in range of 5-10 µg/dL, or possibly lower, as implied by (???). Although no evident threshold has yet been clearly established for those effects, the existence of such effects at still lower blood-Pb levels cannot be ruled out based on available data.

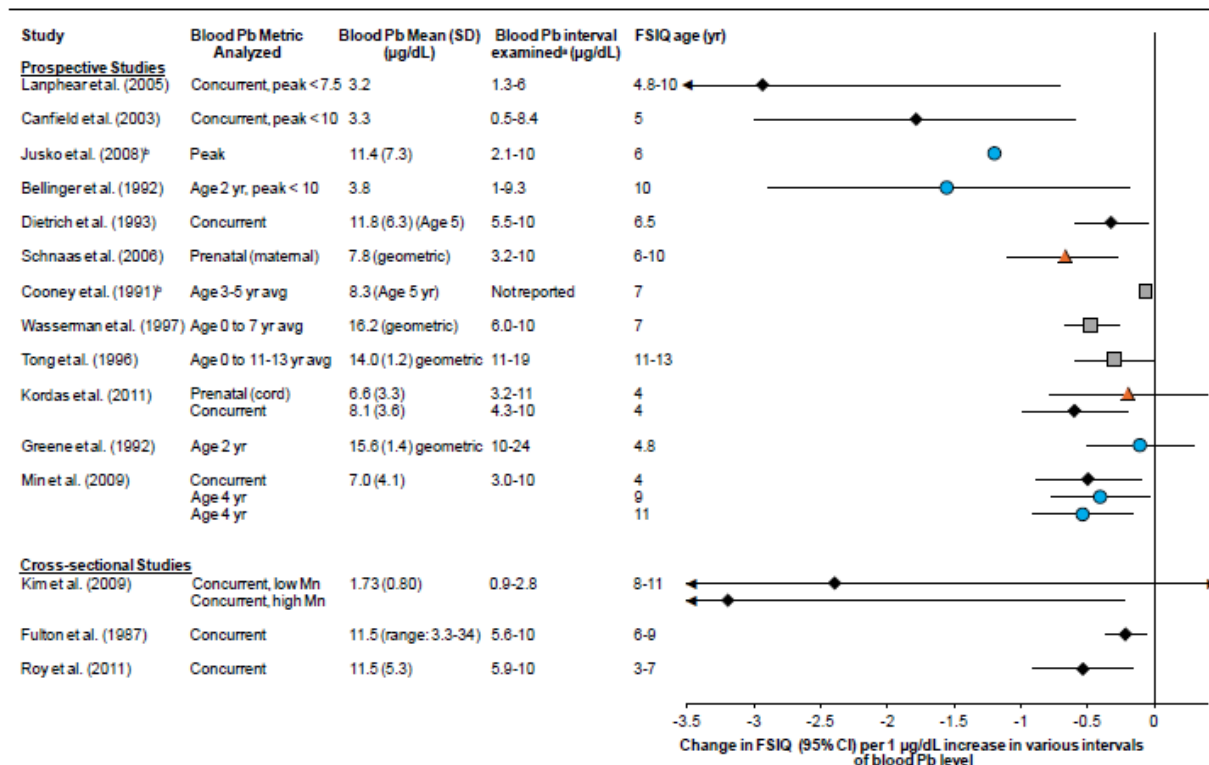
Source: Adapted/updated from Table 1-16 of U.S. Environmental Protection Agency (1986a).

**FIGURE I-13**

Summary of Lowest Observed Effect Levels for Key Lead-Induced Health Effects in Adults (From U.S. EPA 2007), Table 3-2)

In its most recent review of lead health effects, the U.S. EPA confirmed its previous conclusion regarding the cognitive decline in children as the most sensitive adverse effect associated with lead exposures. The effects as measured by a reduction in IQ from a number of studies are shown in the following figure. According to the review, the currently available evidence supports a median estimate of -1.75 IQ points for a change of 1 µg/dL blood lead to describe the neurocognitive impacts on young children (U.S. EPA 2015c).





<sup>a</sup>See Table 4-3 for explanation of the blood Pb level interval examined. Effect estimates were calculated for the lowest range examined in the study or the 10th percentile of blood Pb level to a blood Pb level of 10 µg/dL.

<sup>b</sup>Sufficient data were not available to calculate 95% CI.

Note: Mn = manganese. Results are presented for most of the cohorts examined in the literature and generally are grouped according to strength of study design, representativeness of the study population characteristics and blood Pb levels examined, and extent of consideration for potential confounding. There is not necessarily a continuum of decreasing strength across studies. Results usually are presented for the oldest age examined in cohorts. Multiple results from a cohort are grouped together. To facilitate comparisons among effect estimates across studies with different distributions of blood Pb levels and model structures (e.g., linear, log-linear), effect estimates are standardized to a 1 µg/dL increase for the lowest range of blood Pb levels examined in the study or the interval from the 10th percentile of blood Pb level to 10 µg/dL. For populations with 10th percentiles near or above 10 µg/dL, the effect estimate was calculated for the 10th to 90th percentile of blood Pb level. The percentiles are estimated using various methods and are only approximate values. Effect estimates are assumed to be linear within the blood Pb level interval evaluated. The various tests used to measure FSIQ are scored on a similar scale (approximately 40-160 FSIQ points). Black diamonds, blue circles, orange triangles, and gray squares represent effect estimates for concurrent, earlier childhood, prenatal, and lifetime average blood Pb levels, respectively. The horizontal lines associated with point estimates represent 95% confidence intervals (CI).

**FIGURE I-14**

Associations of Blood Pb Levels with Full-Scale IQ (FSIQ) in Children (From (U.S. EPA 2013a), Figure 4-2)

## TOXIC AIR CONTAMINANTS

Toxic air contaminants are pollutants for which there generally are no ambient air quality standards. The Toxic Air Contaminant Identification and Control Act (AB 1807, Tanner, 1983) created California’s first program to reduce exposures to air toxics by requiring CARB to adopt Air Toxics Control measures. Air Districts must either enforce these measures or adopt their own equally or more stringent measures. The Air Toxics “Hot Spots” Information and Assessment Act (AB 2588, Connelly,

1987) supplements the earlier program by requiring air toxics inventories for certain facilities, notification of people's exposure to significant health risks, and facility plans to reduce these risks. Under California's Air Toxics Program, the Office of Environmental Health Hazard Assessment (OEHHA) assesses the health effects of substances that may pose a risk of adverse health effects, and CARB assesses the potential for humans to be exposed to these substances. These effects are usually an increased risk for cancer, adverse birth outcomes, or respiratory effects. After review by the state Scientific Review Panel, CARB holds a public hearing on whether to formally list substances that may pose a significant risk to public health as a Toxic Air Contaminant. Chapter 9 of the draft 2016 AQMP describes the Air Toxics Control Plan for the SCAQMD.

Air toxics include many different types of chemicals, and the discussion here will not address all air toxics in a comprehensive manner. However, this section will discuss very briefly diesel particulate matter and volatile organic compounds (VOC's), because diesel particulate matter is the most significant contributor to cancer risk in the South Coast Air Basin, and because some VOC's are air toxics, and are part of the control measures proposed in the current Air Quality Management Plan.

## Diesel Particulate Matter

The California Air Resources Board listed diesel particulate matter as a Toxic Air Contaminant in 1998, based on the determination that it was a human carcinogen (California Air Resources Board 2010b). The International Agency for Research on Cancer, an arm of the World Health Organization, classified diesel exhaust as probably carcinogenic to humans in 1989 (International Agency for Research on Cancer 1989). More recently, IARC convened an international panel of scientists to review the published literature since the initial classification regarding the carcinogenicity of diesel combustion emissions. The panel concluded that diesel exhaust is a substance that causes lung cancer in humans (International Agency for Research on Cancer 2012b).

OEHHA also establishes potency factors for air toxics that are carcinogenic. The potency factors can be used to estimate the additional cancer risk from ambient levels of toxics. This estimate represents the chance of contracting cancer in an individual over a lifetime exposure to a given level of an air toxic and is usually expressed in terms of additional cancer cases per million people exposed.

SCAQMD conducted studies on the ambient concentrations and estimated the potential health risks from air toxics (South Coast Air Quality Management District 2000; South Coast Air Quality Management District 2008; South Coast Air Quality Management District 2015). In the latest SCAQMD Multiple Air Toxics Exposure Study, MATES IV, a one-year monitoring program was undertaken at 10 sites throughout the SCAB over the time period July 2012 – June 2013 (South Coast Air Quality Management District 2015). Over 30 substances were measured, which included the toxics that contributed the most to health risks in the Basin. The results showed that the overall lifetime risk for excess cancer from a 70-year lifetime exposure to the levels of air toxics calculated from the regional model was 367 in a million. This reflects a greater than 50 percent reduction in exposures and risks compared to the MATES III Study that was conducted from 2004 -2006. The largest contributor to this risk was diesel particulate matter, accounting for 68 percent of the air

toxics risk. The average measured levels were also compared to the non-cancer chronic Reference Exposure Levels (RELs), and found to be below the established RELs for the over 30 substances measured.

In 2015, OEHHA updated the calculation procedure to estimate cancer risks from air toxics exposures (Dodge et al. 2015). The revisions to the calculation methodology included accounting for higher risks attributable to early life exposures (up to age 16 years), updates to the population distribution of breathing rates by age, and a reduction in the time of household residence. In combination, these changes resulted in risk estimates in the MATES IV study to be about 2.5 times higher than the previous methodology employed in the MATES studies. The average lifetime risk for excess cancer cases is estimated to be 897 per million using the updated procedure (South Coast Air Quality Management District 2015). However, it is important to note that results from the MATES IV study still represent approximately a 50 percent reduction in air toxics levels and cancer risk compared to MATES III. In addition to the maps in the MATES IV final report (South Coast Air Quality Management District 2015), an interactive map of the MATES IV cancer risks from air toxics calculated using the 2015 OEHHA guidelines is available through this website: <http://www.aqmd.gov/home/tools/public>.

In 2009, the Advanced Collaborative Emissions Study (ACES) reported that newer diesel engine technologies are very effective in reducing the amount of emissions from diesel trucks, as required by recent regulations (Khalek et al. 2009). In a long-term exposure study published in 2015, rats breathing the lower emissions did not develop cancer, while the rats breathing the higher emissions from older diesel engines (in previous studies) did develop cancer (McDonald et al. 2015). However, the 2015 study did not evaluate whether the PM from the newer engines was any more or less toxic compared to the older engines on a gram per gram basis; the study was not designed to determine such differences. Therefore, without any additional data on the toxicity of PM from the newer diesel engines, the analysis done in the MATES IV study used the same risk factor for both, applied to the mass of PM. For example, whether a person is exposed to 10  $\mu\text{g}/\text{m}^3$  of particulate matter from a single old diesel engine or several new diesel engines, the cancer risk would be the same because it is calculated based on 10  $\mu\text{g}/\text{m}^3$  of exposure.

In the Particulate Matter section of this Appendix, the vast majority of the studies described evaluated the health effects of total PM<sub>2.5</sub> exposures by mass, regardless of whether they were from newer diesel engines, older diesel engines, or other sources. While this new diesel technology is very effective in terms of reducing the amount of emissions from diesel trucks, what people are being exposed to is a total concentration of PM from many sources. Health studies generally use this total concentration to analyze whether or not there is an effect on the specific health outcomes evaluated. In addition, it is important to note that direct PM<sub>2.5</sub> emissions from diesel engines represent a small portion of overall PM<sub>2.5</sub> exposure. NO<sub>x</sub> emissions from diesel engines that eventually lead to PM<sub>2.5</sub> formation in the atmosphere, however, represent a larger component of PM<sub>2.5</sub> exposure (South Coast Air Quality Management District 2013a; Harley 2014).

## Volatile Organic Compounds

VOC's are a class of air pollutants that undergo photochemical reactions in the air to form ozone. It should be noted that there are no state or national ambient air quality standards for VOCs because they are not classified as criteria pollutants. VOCs are regulated, however, because limiting VOC emissions reduces the rate of photochemical reactions that contribute to the formation of ozone.

VOCs are also transformed into organic aerosols in the atmosphere, contributing to higher PM and lower visibility levels. In addition, VOC's that have toxic properties are also regulated as air toxics. Chapter 3 of the draft 2016 AQMP presents data on VOC sources and emissions in the South Coast Air Basin.

Some examples of VOC's that are known to cause health effects include benzene, toluene, ethylbenzene and xylenes (abbreviated BTEX), 1,3-butadiene, formaldehyde, and perchloroethylene. Several of these VOC's are carcinogenic. Based on the MATES IV analysis, benzene, 1,3-butadiene, and carbonyls (formaldehyde and acetaldehyde) together account for approximately 21 percent of the total cancer risk from air toxics in the SCAB. Not all carcinogenic VOC's are known to cause the same types of cancers, although several are associated with blood cancers. For example, the cancers most closely associated with long-term benzene exposure are leukemias. Formaldehyde is linked to nasopharyngeal cancer and leukemias, while 1,3-butadiene causes cancers in both the blood and lymphatic systems (International Agency for Research on Cancer 2012a).

Many VOC's can also cause non-cancer health effects. For these types of health outcomes, OEHHA has developed acute and chronic Reference Exposure Levels (RELs). RELs are concentrations in the air below which adverse health effects are not likely to occur. Acute RELs refer to short-term exposures, generally of one-hour duration. Chronic RELs refer to long-term exposures of several years. OEHHA has also established eight-hour RELs for several substances. The ratio of ambient concentration to the appropriate REL can be used to calculate a Hazard Index. A Hazard Index of less than one would not be expected to result in adverse effects (Dodge et al. 2015).

In the MATES IV assessment of chronic non-cancer health risks, the monitored air toxics levels were found to be below the chronic RELs. In other words, the general levels of air toxics in the SCAB are not expected to cause adverse non-cancer health effects. Importantly, the MATES IV monitoring network was designed to characterize the air toxics exposures in the basin overall. Given that ambient monitoring is necessarily conducted at a limited number of locations, and modeling is limited to a spatial resolution of 2km, there may be higher exposures not captured by the fixed-site monitoring. To address this limitation, particularly in some communities with environmental justice concerns, the MATES IV study also included local-scale studies in 3 communities very close to known industrial sources or large mobile source facilities, with a focus on ultrafine particles and diesel PM emissions. Details of these study results can be found in the MATES IV final report (South Coast Air Quality Management District 2015).

## ODORS

Environmental odors are recognized as having the potential to cause health effects and/or quality of life impacts. The theory of “miasma” dates back to Hippocrates in ancient Greek times, and related bad odors to disease. The health effects of environmental odors can vary widely, and depend on the compound causing the odor, the level of the compound, as well as the sensitivity and physiological responses of the person detecting the odor.

Different levels of odor exposure can cause a range of responses and health effects, and the science of odor as a potential health issue was summarized previously by Schiffman and Williams (Schiffman et al. 2005b). There are two key nerves in the nasal cavity involved in odor effects: the olfactory nerve provides the sense of smell, while the trigeminal nerve provides the sense of irritation. At very low levels, an odor can be detected (i.e. odor threshold), and at slightly higher levels, an odor can be recognized and identified. At levels higher than detection or recognition levels, an odor can cause annoyance or intolerance, and at even higher levels, an odor can cause irritation or possible toxicity, if the odor is caused by a compound that is also an air toxic (Schiffman et al. 2005b).

Schiffman and Williams proposed three mechanisms of action for odor symptoms (Schiffman et al. 2005b). In the first mechanism, an odor substance can be at the level that can produce irritation, which triggers the trigeminal nerve. This mechanism is considered a toxic effect because symptoms appear when the chemical concentration is at or above the irritation level; here, the odor serves only as the marker of the toxic effect. In the second mechanism, the odor compound is below the irritation level but above odor detection thresholds, which can result in odor annoyance. This mechanism is relatively common among environmental odors, and has been studied in communities exposed to odors from landfills, hazardous waste sites or concentrated animal feeding operations (CAFO’s) (Shusterman et al. 1991; Schiffman et al. 2005a; Heaney et al. 2011; Schinasi et al. 2011; Blanes-Vidal et al. 2012; Hooiveld et al. 2015). In this mechanism, the health effect is not a toxicological effect, and the dose does not necessarily correlate well with the effect in these instances. Genetic factors, previous exposure (“learning”), and beliefs about the safety of the odor may play important roles in these odors causing health symptoms (Shusterman 2001). The third proposed mechanism is when an odor substance is present along with a co-pollutant or endotoxin that is capable of producing health effects. In this mechanism, the effect is also a toxic effect, but the odor serves as a marker of the presence of a mixture that includes a toxic compound; if the co-pollutant were not present, no health effect would be expected in this scenario.

Individual characteristics can play important roles in altering an individual’s response to an odor. Factors that can influence odor perception include age, genetics, gender, medical history (including mental health, neurological conditions, and other health conditions), health-related behaviors (tobacco, alcohol), and occupational and environmental factors (Greenberg et al. 2013; Wilson et al. 2014; Agency for Toxic Substances and Disease Registry 2016). Additionally, an individual’s cognitive associations with the odor prior to an exposure can result in increased reporting of health-related symptoms after exposure (Shusterman et al. 1991; Shusterman 2001; Greenberg et al. 2013). Common symptoms associated with environmental odor exposures include headache, nasal

congestion, eye, nose and throat irritation, hoarseness or sore throat, cough, chest tightness, shortness of breath, wheezing heart palpitations, nausea, drowsiness, and mental depression (Agency for Toxic Substances and Disease Registry 2016). If the concentrations of the odor compound are below irritation levels, then the symptoms are not expected to persist once the person is no longer exposed; however, being exposed to odor levels at or above irritation levels for longer periods of time may cause symptoms that persist after moving out of the exposure area (Agency for Toxic Substances and Disease Registry 2016).

## CONCLUSIONS

A large body of scientific evidence shows that the adverse impacts of air pollution on human and animal health are clear. A considerable number of population-based and laboratory studies have established a link between air pollution and increased morbidity and, in some instances, premature mortality. Importantly, the health effects of air pollution extend beyond respiratory effects, and there is substantial evidence that air pollution (including particulate matter and ozone) exposures cause cardiovascular morbidity and mortality. Some air pollutants, such as diesel PM, lead, and several other air toxics, have been linked to increased cancer risk. Health studies have also identified populations who may be more susceptible to the adverse effects of air pollution, such as children, older adults, low SES communities, people with certain pre-existing health conditions, and people with certain genetic factors. Understanding the impacts of air pollution on these more susceptible populations can help inform policies that better protect public health, for example, in setting standards for criteria air pollutants, and in the development of methods to evaluate air toxics health risks. Continued research on the effects of specific PM constituents and ultrafine particles will be important in furthering the understanding of how these pollutants affect human health.

As the scientific methods for the study of air pollution health effects have progressed over the past decades, adverse effects have been shown to occur at lower levels of exposure. For some pollutants, no clear thresholds for effects have been demonstrated. The new findings have, in turn, led to the revision and lowering of National Ambient Air Quality Standards (NAAQS) which, in the judgment of the Administrator of the U.S. EPA, are necessary to protect public health. Chapter 8 of the draft 2016 AQMP provides an overview of the extensive, multi-year, public process involved in setting federal air quality standards. Assessments of the scientific evidence from health studies is an important part of the process, and has helped inform revisions to the federal air pollution standards. Figures I-15 and I-16 are meant to convey some of the historical context to recent revisions to the NAAQS for ozone and for particulate matter, with regard to key developments in the understanding of the health effects of these pollutants.

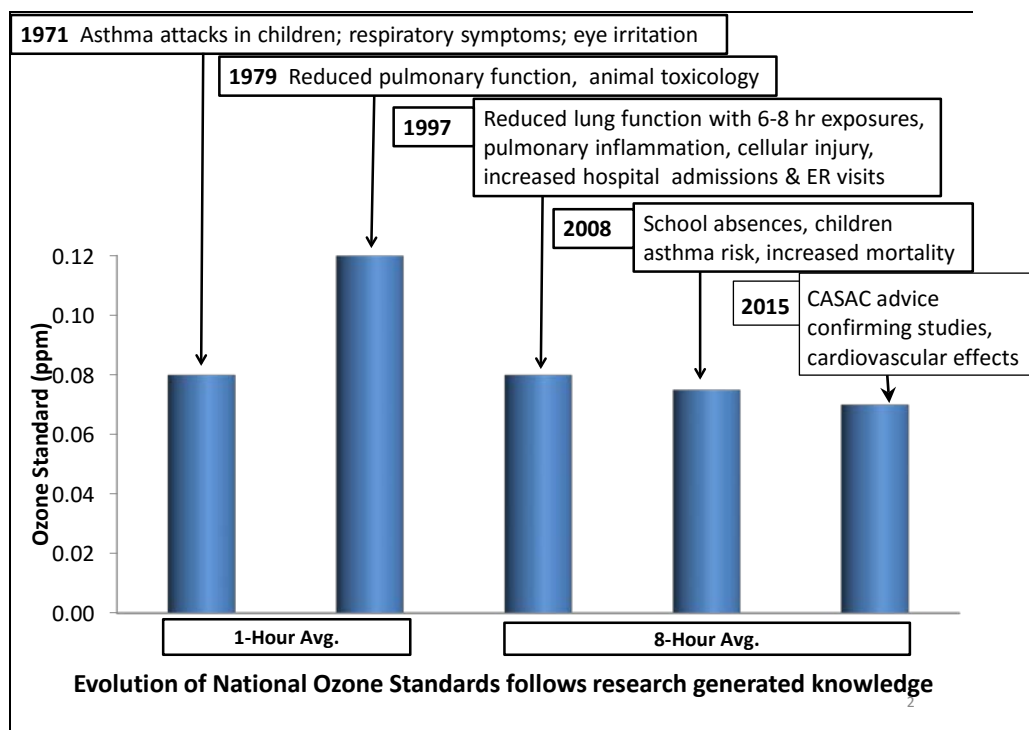


FIGURE I-15

Historical Context to Revisions of NAAQS for Ozone

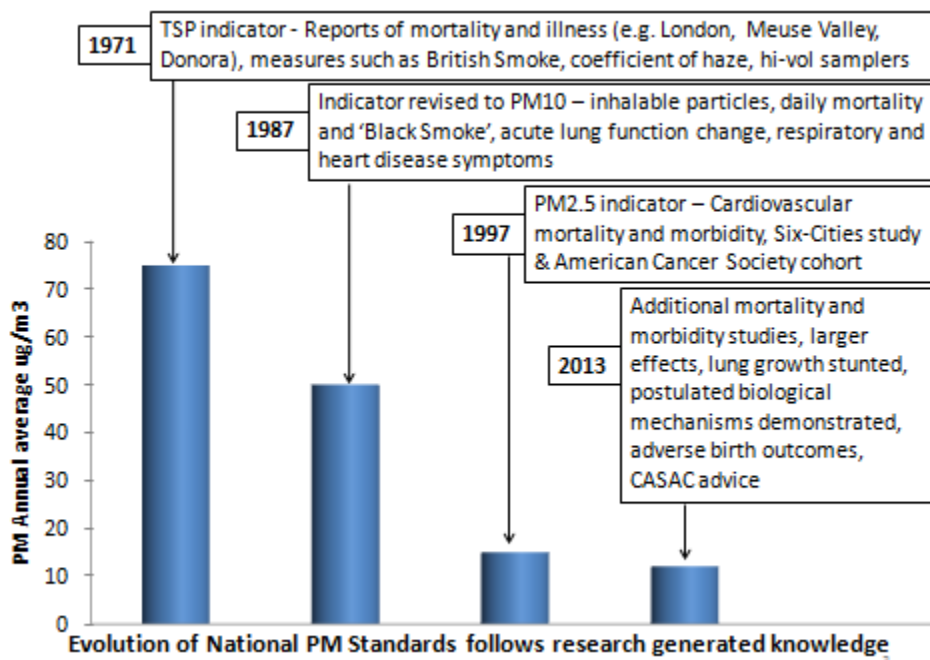


FIGURE I-16

Historical Context to Revisions of NAAQS for PM

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SCAQMD

SIERRA CLUB v. COUNTY OF FRESNO

AMICUS BRIEF

**S219783**

**IN THE SUPREME COURT OF CALIFORNIA**

---

SIERRA CLUB, REVIVE THE SAN JOAQUIN, and  
LEAGUE OF WOMEN VOTERS OF FRESNO,

Plaintiffs and Appellants,

v.

COUNTY OF FRESNO,

Defendant and Respondent,

and,

FRIANT RANCH, L.P.,

Real Party in Interest and Respondent.

SUPREME COURT  
FILED

APR 13 2015

Frank A. McGuire Clerk  
Deputy

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After a Published Decision by the Court of Appeal, filed May 27, 2014  
Fifth Appellate District Case No. F066798

Appeal from the Superior Court of California, County of Fresno  
Case No. 11CECG00726  
Honorable Rosendo A. Pena, Jr.

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**APPLICATION OF THE SOUTH COAST AIR QUALITY  
MANAGEMENT DISTRICT FOR LEAVE TO FILE  
BRIEF OF *AMICUS CURIAE* IN SUPPORT OF NEITHER PARTY  
AND [*PROPOSED*] BRIEF OF *AMICUS CURIAE***

---

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**TO THE HONORABLE CHIEF JUSTICE AND JUSTICES OF THE  
SUPREME COURT:**

**APPLICATION FOR LEAVE TO FILE *AMICUS CURIAE* BRIEF**

Pursuant to Rule 8.520(f) of the California Rules of Court, the South Coast Air Quality Management District (SCAQMD) respectfully requests leave to file the attached *amicus curiae* brief. Because SCAQMD's position differs from that of either party, we request leave to submit this *amicus* brief in support of neither party.

**HOW THIS BRIEF WILL ASSIST THE COURT**

SCAQMD's proposed *amicus* brief takes a position on two of the issues in this case. In both instances, its position differs from that of either party. The issues are:

- 1) Does the California Environmental Quality Act (CEQA) require an environmental impact report (EIR) to correlate a project's air pollution emissions with specific levels of health impacts?
- 2) What is the proper standard of review for determining whether an EIR provides sufficient information on the health impacts caused by a project's emission of air pollutants?

This brief will assist the Court by discussing the practical realities of correlating identified air quality impacts with specific health outcomes. In short, CEQA requires agencies to provide detailed information about a project's air quality impacts that is sufficient for the public and decisionmakers to adequately evaluate the project and meaningfully understand its impacts. However, the level of analysis is governed by a rule of reason; CEQA only requires agencies to conduct analysis if it is reasonably feasible to do so.

With regard to health-related air quality impacts, an analysis that correlates a project's air pollution emissions with specific levels of health impacts will be feasible in some cases but not others. Whether it is feasible depends on a variety of factors, including the nature of the project and the nature of the analysis under consideration. The feasibility of analysis may also change over time as air districts and others develop new tools for measuring projects' air quality related health impacts. Because SCAQMD has among the most sophisticated air quality modeling and health impact evaluation capability of any of the air districts in the State, it is uniquely situated to express an opinion on the extent to which the Court should hold that CEQA requires lead agencies to correlate air quality impacts with specific health outcomes.

SCAQMD can also offer a unique perspective on the question of the appropriate standard of review. SCAQMD submits that the proper standard of review for determining whether an EIR is sufficient as an informational document is more nuanced than argued by either party. In our view, this is a mixed question of fact and law. It includes determining whether additional analysis is feasible, which is primarily a factual question that should be reviewed under the substantial evidence standard. However, it also involves determining whether the omission of a particular analysis renders an EIR insufficient to serve CEQA's purpose as a meaningful, informational document. If a lead agency has not determined that a requested analysis is infeasible, it is the court's role to determine whether the EIR nevertheless meets CEQA's purposes, and courts should not defer to the lead agency's conclusions regarding the legal sufficiency of an EIR's analysis. The ultimate question of whether an EIR's analysis is "sufficient" to serve CEQA's informational purposes is predominately a question of law that courts should review *de novo*.

This brief will explain the rationale for these arguments and may assist the Court in reaching a conclusion that accords proper respect to a lead agency's factual conclusions while maintaining judicial authority over the ultimate question of what level of analysis CEQA requires.

#### **STATEMENT OF INTEREST OF *AMICUS CURIAE***

The SCAQMD is the regional agency primarily responsible for air pollution control in the South Coast Air Basin, which consists of all of Orange County and the non-desert portions of the Los Angeles, Riverside, and San Bernardino Counties. (Health & Saf. Code § 40410; Cal. Code Regs., tit. 17, § 60104.) The SCAQMD participates in the CEQA process in several ways. Sometimes it acts as a lead agency that prepares CEQA documents for projects. Other times it acts as a responsible agency when it has permit authority over some part of a project that is undergoing CEQA review by a different lead agency. Finally, SCAQMD also acts as a commenting agency for CEQA documents that it receives because it is a public agency with jurisdiction by law over natural resources affected by the project.

In all of these capacities, SCAQMD will be affected by the decision in this case. SCAQMD sometimes submits comments requesting that a lead agency perform an additional type of air quality or health impacts analysis. On the other hand, SCAQMD sometimes determines that a particular type of health impact analysis is not feasible or would not produce reliable and informative results. Thus, SCAQMD will be affected by the Court's resolution of the extent to which CEQA requires EIRs to correlate emissions and health impacts, and its resolution of the proper standard of review.



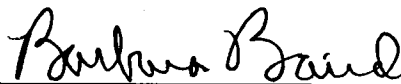
**CERTIFICATION REGARDING AUTHORSHIP AND FUNDING**

No party or counsel in the pending case authored the proposed amicus curiae brief in whole or in part, or made any monetary contribution intended to fund the preparation or submission of the brief. No person or entity other than the proposed *Amicus Curiae* made any monetary contribution intended to fund the preparation or submission of the brief.

Respectfully submitted,

DATED: April 3, 2015

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## BRIEF OF AMICUS CURIAE

### SUMMARY OF ARGUMENT

The South Coast Air Quality Management District (SCAQMD) submits that this Court should not try to establish a hard-and-fast rule concerning whether lead agencies are required to correlate emissions of air pollutants with specific health consequences in their environmental impact reports (EIR). The level of detail required in EIRs is governed by a few, core CEQA (California Environmental Quality Act) principles. As this Court has stated, “[a]n EIR must include detail sufficient to enable those who did not participate in its preparation to understand and to consider meaningfully the issues raised by the proposed project.” (*Laurel Heights Improvement Assn. v. Regents of the Univ of Cal.* (1988) 47 Cal.3d 376, 405 [*“Laurel Heights I”*]) Accordingly, “an agency must use its best efforts to find out and disclose all that it reasonably can.” (*Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 428 (quoting CEQA Guidelines § 15144)<sup>1</sup>). However, “[a]nalysis of environmental effects need not be exhaustive, but will be judged in light of what is reasonably feasible.” (*Association of Irrigated Residents v. County of Madera* (2003) 107 Cal.App.4th 1383, 1390; CEQA Guidelines §§ 15151, 15204(a).)

With regard to analysis of air quality related health impacts, EIRs must generally quantify a project’s pollutant emissions, but in some cases it is not feasible to correlate these emissions to specific, quantifiable health impacts (e.g., premature mortality; hospital admissions). In such cases, a general description of the adverse health impacts resulting from the pollutants at issue may be sufficient. In other cases, due to the magnitude

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<sup>1</sup> The CEQA Guidelines are found at Cal. Code Regs., tit. 14 §§ 15000, *et seq.*

or nature of the pollution emissions, as well as the specificity of the project involved, it may be feasible to quantify health impacts. Or there may be a less exacting, but still meaningful analysis of health impacts that can feasibly be performed. In these instances, agencies should disclose those impacts.

SCAQMD also submits that whether or not an EIR complies with CEQA's informational mandates by providing sufficient, feasible analysis is a mixed question of fact and law. Pertinent here, the question of whether an EIR's discussion of health impacts from air pollution is sufficient to allow the public to understand and consider meaningfully the issues involves two inquiries: (1) Is it feasible to provide the information or analysis that a commenter is requesting or a petitioner is arguing should be required?; and (2) Even if it is feasible, is the agency relying on other policy or legal considerations to justify not preparing the requested analysis? The first question of whether an analysis is feasible is primarily a question of fact that should be judged by the substantial evidence standard. The second inquiry involves evaluating CEQA's information disclosure purposes against the asserted reasons to not perform the requested analysis. For example, an agency might believe that its EIR meets CEQA's informational disclosure standards even without a particular analysis, and therefore choose not to conduct that analysis. SCAQMD submits that this is more of a legal question, which should be reviewed de novo as a question of law.

## **ARGUMENT**

### **I. RELEVANT FACTUAL AND LEGAL FRAMEWORK.**

#### **A. Air Quality Regulatory Background**

The South Coast Air Quality Management District (SCAQMD) is one of the local and regional air pollution control districts and air quality

management districts in California. The SCAQMD is the regional air pollution agency for the South Coast Air Basin, which consists of all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties. (Health & Saf. Code § 40410, 17 Cal. Code Reg. § 60104.) The SCAQMD also includes the Coachella Valley in Riverside County (Palm Springs area to the Salton Sea). (SCAQMD, *Final 2012 AQMP (Feb. 2013)*, <http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan/final-2012-air-quality-management-plan>; then follow “chapter 7” hyperlink; pp 7-1, 7-3 (last visited Apr. 1, 2015).) The SCAQMD's jurisdiction includes over 16 million residents and has the worst or nearly the worst air pollution levels in the country for ozone and fine particulate matter. (SCAQMD, *Final 2012 AQMP (Feb. 2013)*, <http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan/final-2012-air-quality-management-plan>; then follow “Executive Summary” hyperlink p. ES-1 (last visited Apr. 1, 2015).)

Under California law, the local and regional districts are primarily responsible for controlling air pollution from all sources except motor vehicles. (Health & Saf. Code § 40000.) The California Air Resources Board (CARB), part of the California Environmental Protection Agency, is primarily responsible for controlling pollution from motor vehicles. (*Id.*) The air districts must adopt rules to achieve and maintain the state and federal ambient air quality standards within their jurisdictions. (Health & Saf. Code § 40001.)

The federal Clean Air Act (CAA) requires the United States Environmental Protection Agency (EPA) to identify pollutants that are widely distributed and pose a threat to human health, developing a so-called “criteria” document. (42 U.S.C. § 7408; CAA § 108.) These pollutants are frequently called “criteria pollutants.” EPA must then establish “national ambient air quality standards” at levels “requisite to protect public health”,

allowing “an adequate margin of safety.” (42 U.S.C. § 7409; CAA § 109.) EPA has set standards for six identified pollutants: ozone, nitrogen dioxide, sulfur dioxide, carbon monoxide, particulate matter (PM), and lead. (U.S. EPA, National Ambient Air Quality Standards (NAAQS), <http://www.epa.gov/air/criteria.html> (last updated Oct. 21, 2014).)<sup>2</sup>

Under the Clean Air Act, EPA sets emission standards for motor vehicles and “nonroad engines” (mobile farm and construction equipment, marine vessels, locomotives, aircraft, etc.). (42 U.S.C. §§ 7521, 7547; CAA §§ 202, 213.) California is the only state allowed to establish emission standards for motor vehicles and most nonroad sources; however, it may only do so with EPA's approval. (42 U.S.C. §§ 7543(b), 7543(e); CAA §§ 209(b), 209(c).) Sources such as manufacturing facilities, power plants and refineries that are not mobile are often referred to as “stationary sources.” The Clean Air Act charges state and local agencies with the primary responsibility to attain the national ambient air quality standards. (42 U.S.C. § 7401(a)(3); CAA § 101(a)(3).) Each state must adopt and implement a plan including enforceable measures to achieve and maintain the national ambient air quality standards. (42 U.S.C. § 7410; CAA § 110.) The SCAQMD and CARB jointly prepare portion of the plan for the South Coast Air Basin and submit it for approval by EPA. (Health & Saf. Code §§ 40460, et seq.)

The Clean Air Act also requires state and local agencies to adopt a permit program requiring, among other things, that new or modified “major” stationary sources use technology to achieve the “lowest achievable emission rate,” and to control minor stationary sources as

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<sup>2</sup> Particulate matter (PM) is further divided into two categories: fine particulate or PM<sub>2.5</sub> (particles with a diameter of less than or equal to 2.5 microns) and coarse particulate (PM<sub>10</sub>) (particles with a diameter of 10 microns or less). (U.S. EPA, Particulate Matter (PM), <http://www.epa.gov/airquality/particulatepollution/> (last visited Apr. 1, 2015).)

needed to help attain the standards. (42 U.S.C. §§ 7502(c)(5), 7503(a)(2), 7410(a)(2)(C); CAA §§ 172(c)(5), 173(a)(2), 110(a)(2)(C).) The air districts implement these permit programs in California. (Health & Saf. Code §§ 42300, et seq.)

The Clean Air Act also sets out a regulatory structure for over 100 so-called “hazardous air pollutants” calling for EPA to establish “maximum achievable control technology” (MACT) for sources of these pollutants. (42 U.S.C. § 7412(d)(2); CAA § 112(d)(2).) California refers to these pollutants as “toxic air contaminants” (TACs) which are subject to two state-required programs. The first program requires “air toxics control measures” for specific categories of sources. (Health & Saf. Code § 39666.) The other program requires larger stationary sources and sources identified by air districts to prepare “health risk assessments” for impacts of toxic air contaminants. (Health & Saf. Code §§ 44320(b), 44322, 44360.) If the health risk exceeds levels identified by the district as “significant,” the facility must implement a “risk reduction plan” to bring its risk levels below “significant” levels. Air districts may adopt additional more stringent requirements than those required by state law, including requirements for toxic air contaminants. (Health & Saf. Code § 41508; *Western Oil & Gas Assn. v. Monterey Bay Unified APCD* (1989) 49 Cal.3d 408, 414.) For example, SCAQMD has adopted a rule requiring new or modified sources to keep their risks below specified levels and use best available control technology (BACT) for toxics. (SCAQMD, *Rule 1401-New Source Review of Toxic Air Contaminants*, <http://www.aqmd.gov/home/regulations/rules/scaqmd-rule-book/regulation-xiv>; then follow “Rule 1401” hyperlink (last visited Apr. 1, 2015).)

## **B. The SCAQMD's Role Under CEQA**

The California Environmental Quality Act (CEQA) requires public agencies to perform an environmental review and appropriate analysis for projects that they implement or approve. (Pub. Resources Code § 21080(a).) The agency with primary approval authority for a particular project is generally the “lead agency” that prepares the appropriate CEQA document. (CEQA Guidelines §§ 15050, 15051.) Other agencies having a subsequent approval authority over all or part of a project are called “responsible” agencies that must determine whether the CEQA document is adequate for their use. (CEQA Guidelines §§ 15096(c), 15381.) Lead agencies must also consult with and circulate their environmental impact reports to “trustee agencies” and agencies “with jurisdiction by law” including “authority over resources which may be affected by the project.” (Pub. Resources Code §§ 21104(a), 21153; CEQA Guidelines §§ 15086(a)(3), 15073(c).) The SCAQMD has a role in all these aspects of CEQA.

Fulfilling its responsibilities to implement its air quality plan and adopt rules to attain the national ambient air quality standards, SCAQMD adopts a dozen or more rules each year to require pollution reductions from a wide variety of sources. The SCAQMD staff evaluates each rule for any adverse environmental impact and prepares the appropriate CEQA document. Although most rules reduce air emissions, they may have secondary environmental impacts such as use of water or energy or disposal of waste—e.g., spent catalyst from control equipment.<sup>3</sup>

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<sup>3</sup> The SCAQMD's CEQA program for its rules is a “Certified Regulatory Program” under which it prepares a “functionally equivalent” document in lieu of a negative declaration or EIR. (Pub. Resources Code § 21080.5, CEQA Guidelines § 15251(l).)

The SCAQMD also approves a large number of permits every year to construct new, modified, or replacement facilities that emit regulated air pollutants. The majority of these air pollutant sources have already been included in an earlier CEQA evaluation for a larger project, are currently being evaluated by a local government as lead agency, or qualify for an exemption. However, the SCAQMD sometimes acts as lead agency for major projects where the local government does not have a discretionary approval. In such cases, SCAQMD prepares and certifies a negative declaration or environmental impact report (EIR) as appropriate.<sup>4</sup> SCAQMD evaluates perhaps a dozen such permit projects under CEQA each year. SCAQMD is often also a “responsible agency” for many projects since it must issue a permit for part of the projects (e.g., a boiler used to provide heat in a commercial building). For permit projects evaluated by another lead agency under CEQA, SCAQMD has the right to determine that the CEQA document is inadequate for its purposes as a responsible agency, but it may not do so because its permit program already requires all permitted sources to use the best available air pollution control technology. (SCAQMD, *Rule 1303(a)(1) – Requirements*, <http://www.aqmd.gov/home/regulations/rules/scaqmd-rule-book/regulation-xiii>; then follow “Rule 1303” hyperlink (last visited Apr. 1, 2015).)

Finally, SCAQMD receives as many as 60 or more CEQA documents each month (around 500 per year) in its role as commenting agency or an agency with “jurisdiction by law” over air quality—a natural resource affected by the project. (Pub. Resources Code §§ 21104(a), 21153; CEQA Guidelines § 15366(a)(3).) The SCAQMD staff provides comments on as many as 25 or 30 such documents each month.

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<sup>4</sup> The SCAQMD's permit projects are not included in its Certified Regulatory Program, and are evaluated under the traditional local government CEQA analysis. (Pub. Resources Code §§ 21150-21154.)



(SCAQMD Governing Board Agenda, Apr. 3, 2015, Agenda Item 16, Attachment A, <http://www.aqmd.gov/home/library/meeting-agendas-minutes/agenda?title=governing-board-meeting-agenda-april-3-2015>; then follow “16. Lead Agency Projects and Environmental Documents Received by SCAQMD” hyperlink (last visited Apr. 1, 2015).) Of course, SCAQMD focuses its commenting efforts on the more significant projects.

Typically, SCAQMD comments on the adequacy of air quality analysis, appropriateness of assumptions and methodology, and completeness of the recommended air quality mitigation measures. Staff may comment on the need to prepare a health risk assessment detailing the projected cancer and noncancer risks from toxic air contaminants resulting from the project, particularly the impacts of diesel particulate matter, which CARB has identified as a toxic air contaminant based on its carcinogenic effects. (California Air Resources Board, Resolution 98-35, Aug. 27, 1998, <http://www.arb.ca.gov/regact/diesltac/diesltac.htm>; then follow Resolution 98-35 hyperlink (last visited Apr. 1, 2015).) Because SCAQMD already requires new or modified stationary sources of toxic air contaminants to use the best available control technology for toxics and to keep their risks below specified levels, (SCAQMD Rule 1401, *supra*, note 15), the greatest opportunity to further mitigate toxic impacts through the CEQA process is by reducing emissions—particularly diesel emissions—from vehicles.

**II. THIS COURT SHOULD NOT SET A HARD-AND-FAST RULE CONCERNING THE EXTENT TO WHICH AN EIR MUST CORRELATE A PROJECT’S EMISSION OF POLLUTANTS WITH RESULTING HEALTH IMPACTS.**

Numerous cases hold that courts do not review the correctness of an EIR's conclusions but rather its sufficiency as an informative document. (*Laurel Heights 1*, *supra*, 47 Cal.3d at p. 392; *Citizens of Goleta Valley v.*

*Bd. of Supervisors* (1990) 52 Cal.3d 553, 569; *Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal.App.4th 1184, 1197.)

As stated by the Court of Appeal in this case, where an EIR has addressed a topic, but the petitioner claims that the information provided about that topic is insufficient, courts must “draw[] a line that divides *sufficient* discussions from those that are *insufficient*.” (*Sierra Club v. County of Fresno* (2014) 226 Cal.App.4th 704 (superseded by grant of review) 172 Cal.Rptr.3d 271, 290.) The Court of Appeal readily admitted that “[t]he terms themselves – sufficient and insufficient – provide little, if any, guidance as to where the line should be drawn. They are simply labels applied once the court has completed its analysis.” (*Id.*)

The CEQA Guidelines, however, provide guidance regarding what constitutes a sufficient discussion of impacts. Section 15151 states that “the sufficiency of an EIR is to be reviewed in light of what is reasonably feasible.” Case law reflects this: “Analysis of environmental effects need not be exhaustive, but will be judged in light of what was reasonably feasible.” (*Association of Irrigated Residents v. County of Madera, supra*, 107 Cal.App.4th at p. 1390; see also CEQA Guidelines § 15204(a).)

Applying this test, this Court cannot realistically establish a hard-and-fast rule that an analysis correlating air pollution impacts of a project to quantified resulting health impacts is always required, or indeed that it is never required. Simply put, in some cases such an analysis will be “feasible”; in some cases it will not.

For example, air pollution control districts often require a proposed new source of toxic air contaminants to prepare a “health risk assessment” before issuing a permit to construct. District rules often limit the allowable cancer risk the new source may cause to the “maximally exposed individual” (worker and residence exposures). (*See, e.g.*, SCAQMD Rule 1401(c)(8); 1401(d)(1), *supra* note 15.) In order to perform this analysis, it

is necessary to have data regarding the sources and types of air toxic contaminants, location of emission points, velocity of emissions, the meteorology and topography of the area, and the location of receptors (worker and residence). (SCAQMD, *Supplemental Guidelines for Preparing Risk Assessments for the Air Toxics "Hot Spots" Information and Assessment Act (AB2588)*, pp. 11-16; (last visited Apr. 1, 2015) <http://www.aqmd.gov/home/library/documents-support-material>; "Guidelines" hyperlink; AB2588; then follow AB2588 Risk Assessment Guidelines hyperlink.)

Thus, it is feasible to determine the health risk posed by a new gas station locating at an intersection in a mixed use area, where receptor locations are known. On the other hand, it may not be feasible to perform a health risk assessment for airborne toxics that will be emitted by a generic industrial building that was built on "speculation" (i.e., without knowing the future tenant(s)). Even where a health risk assessment can be prepared, however, the resulting maximum health risk value is only a calculation of risk—it does not necessarily mean anyone will contract cancer as a result of the project.

In order to find the "cancer burden" or expected additional cases of cancer resulting from the project, it is also necessary to know the numbers and location of individuals living within the "zone of impact" of the project: i.e., those living in areas where the projected cancer risk from the project exceeds one in a million. (SCAQMD, Health Risk Assessment Summary form, <http://www.aqmd.gov/home/forms>; filter by "AB2588" category; then "Health Risk Assessment" hyperlink (last visited Apr. 1, 2015).) The affected population is divided into bands of those exposed to at least 1 in a million risk, those exposed to at least 10 in a million risk, etc. up to those exposed at the highest levels. (*Id.*) This data allows agencies to calculate an approximate number of additional cancer cases expected from

the project. However, it is not possible to predict which particular individuals will be affected.

For the so-called criteria pollutants<sup>5</sup>, such as ozone, it may be more difficult to quantify health impacts. Ozone is formed in the atmosphere from the chemical reaction of the nitrogen oxides (NO<sub>x</sub>) and volatile organic compounds (VOC) in the presence of sunlight. (U.S. EPA, Ground Level Ozone, <http://www.epa.gov/airquality/ozonepollution/> (last updated Mar. 25, 2015).) It takes time and the influence of meteorological conditions for these reactions to occur, so ozone may be formed at a distance downwind from the sources. (U.S. EPA, *Guideline on Ozone Monitoring Site Selection* (Aug. 1998) EPA-454/R-98-002 § 5.1.2, <http://www.epa.gov/ttnamti1/archive/cpreldoc.html> (last visited Apr. 1, 2015).) NO<sub>x</sub> and VOC are known as “precursors” of ozone.

Scientifically, health effects from ozone are correlated with increases in the ambient level of ozone in the air a person breathes. (U.S. EPA, *Health Effects of Ozone in the General Population*, Figure 9, <http://www.epa.gov/apti/ozonehealth/population.html#levels> (last visited Apr. 1, 2015).) However, it takes a large amount of additional precursor emissions to cause a modeled increase in ambient ozone levels over an entire region. For example, the SCAQMD's 2012 AQMP showed that reducing NO<sub>x</sub> by 432 tons per day (157,680 tons/year) and reducing VOC by 187 tons per day (68,255 tons/year) would reduce ozone levels at the SCAQMD's monitor site with the highest levels by only 9 parts per billion. (South Coast Air Quality Management District, *Final 2012 AQMP (February 2013)*, <http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan/final-2012-air-quality-management-plan>; then follow “Appendix V: Modeling & Attainment Demonstrations” hyperlink,

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<sup>5</sup> See discussion of types of pollutants, *supra*, Part I.A.

pp. v-4-2, v-7-4, v-7-24.) SCAQMD staff does not currently know of a way to accurately quantify ozone-related health impacts caused by NO<sub>x</sub> or VOC emissions from relatively small projects.

On the other hand, this type of analysis may be feasible for projects on a regional scale with very high emissions of NO<sub>x</sub> and VOCs, where impacts are regional. For example, in 2011 the SCAQMD performed a health impact analysis in its CEQA document for proposed Rule 1315, which authorized various newly-permitted sources to use offsets from the districts “internal bank” of emission reductions. This CEQA analysis accounted for essentially *all* the increases in emissions due to new or modified sources in the District between 2010 and 2030.<sup>6</sup> The SCAQMD was able to correlate this very large emissions increase (e.g., 6,620 pounds per day NO<sub>x</sub> (1,208 tons per year), 89,180 pounds per day VOC (16,275 tons per year)) to expected health outcomes from ozone and particulate matter (e.g., 20 premature deaths per year and 89,947 school absences in the year 2030 due to ozone).<sup>7</sup> (SCAQMD Governing Board Agenda, February 4, 2011, Agenda Item 26, *Assessment for: Re-adoption of Proposed Rule 1315 – Federal New Source Review Tracking System* (see hyperlink in fn 6) at p. 4.1-35, Table 4.1-29.)

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<sup>6</sup> (SCAQMD Governing Board Agenda, February 4, 2011, Agenda Item 26, Attachment G, *Assessment for: Re-adoption of Proposed Rule 1315 – Federal New Source Review Tracking System, Vol. 1, p.4.0-6*, <http://www.aqmd.gov/home/library/meeting-agendas-minutes/agenda?title=governing-board-meeting-agenda-february-4-2011>; the follow “26. Adopt Proposed Rule 1315 – Federal New Source Review Tracking System” (last visited April 1, 2015).)

<sup>7</sup> The SCAQMD was able to establish the location of future NO<sub>x</sub> and VOC emissions by assuming that new projects would be built in the same locations and proportions as existing stationary sources. This CEQA document was upheld by the Los Angeles County Superior Court in *Natural Res. Def. Council v SCAQMD*, Los Angeles Superior Court No. BS110792).

However, a project emitting only 10 tons per year of NO<sub>x</sub> or VOC is small enough that its regional impact on ambient ozone levels may not be detected in the regional air quality models that are currently used to determine ozone levels. Thus, in this case it would not be feasible to directly correlate project emissions of VOC or NO<sub>x</sub> with specific health impacts from ozone. This is in part because ozone formation is not linearly related to emissions. Ozone impacts vary depending on the location of the emissions, the location of other precursor emissions, meteorology and seasonal impacts, and because ozone is formed some time later and downwind from the actual emission. (EPA Guideline on Ozone Monitoring Site Selection (Aug. 1998) EPA-454/R-98-002, § 5.1.2; <https://www.epa.gov/ttnamti1/archive/cpreldoc.html>; then search “Guideline on Ozone Monitoring Site Selection” click on pdf) (last viewed Apr. 1, 2015).)

SCAQMD has set its CEQA “significance” threshold for NO<sub>x</sub> and VOC at 10 tons per year (expressed as 55 lb/day). (SCAQMD, *Air Quality Analysis Handbook*, <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>; then follow “SCAQMD Air Quality Significance Thresholds” hyperlink (last visited Apr. 1, 2015).) This is because the federal Clean Air Act defines a “major” stationary source for “extreme” ozone nonattainment areas such as SCAQMD as one emitting 10 tons/year. (42 U.S.C. §§ 7511a(e), 7511a(f); CAA §§ 182(e), 182(f).) Under the Clean Air Act, such sources are subject to enhanced control requirements (42 U.S.C. §§ 7502(c)(5), 7503; CAA §§ 172(c)(5), 173), so SCAQMD decided this was an appropriate threshold for making a CEQA “significance” finding and requiring feasible mitigation. Essentially, SCAQMD takes the position that a source that emits 10 tons/year of NO<sub>x</sub> or VOC would contribute cumulatively to ozone formation. Therefore, lead agencies that use SCAQMD’s thresholds of significance may determine

that many projects have “significant” air quality impacts and must apply all feasible mitigation measures, yet will not be able to precisely correlate the project to quantifiable health impacts, unless the emissions are sufficiently high to use a regional modeling program.

In the case of particulate matter (PM<sub>2.5</sub>)<sup>8</sup>, another “criteria” pollutant, SCAQMD staff is aware of two possible methods of analysis. SCAQMD used regional modeling to predict expected health impacts from its proposed Rule 1315, as mentioned above. Also, the California Air Resources Board (CARB) has developed a methodology that can predict expected mortality (premature deaths) from large amounts of PM<sub>2.5</sub>. (California Air Resources Board, *Health Impacts Analysis: PM Premature Death Relationship*, [http://www.arb.ca.gov/research/health/pm-mort/pm-mort\\_arch.htm](http://www.arb.ca.gov/research/health/pm-mort/pm-mort_arch.htm) (last reviewed Jan. 19, 2012).) SCAQMD used the CARB methodology to predict impacts from three very large power plants (e.g., 731-1837 lbs/day). (Final Environmental Assessment for Rule 1315, *supra*, pp 4.0-12, 4.1-13, 4.1-37 (e.g., 125 premature deaths in the entire SCAQMD in 2030), 4.1-39 (0.05 to 1.77 annual premature deaths from power plants.) Again, this project involved large amounts of additional PM<sub>2.5</sub> in the District, up to 2.82 tons/day (5,650 lbs/day of PM<sub>2.5</sub>, or, or 1029 tons/year. (*Id.* at table 4.1-4, p. 4.1-10.)

However, the primary author of the CARB methodology has reported that this PM<sub>2.5</sub> health impact methodology is not suited for small projects and may yield unreliable results due to various uncertainties.<sup>9</sup> (SCAQMD, *Final Subsequent Mitigated Negative Declaration for: Warren*

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<sup>8</sup> SCAQMD has not attained the latest annual or 24-hour national ambient air quality standards for “PM<sub>2.5</sub>” or particulate matter less than 2.5 microns in diameter.

<sup>9</sup> Among these uncertainties are the representativeness of the population used in the methodology, and the specific source of PM and the corresponding health impacts. (*Id.* at p. 2-24.)

*E&P, Inc. WTU Central Facility, New Equipment Project* (certified July 19, 2011), <http://www.aqmd.gov/home/library/documents-support-material/lead-agency-permit-projects/permit-project-documents---year-2011>; then follow “Final Subsequent Mitigated Negative Declaration for Warren E&P Inc. WTU Central Facility, New Equipment Project” hyperlink, pp. 2-22, 2-23 (last visited Apr. 1, 2015).) Therefore, when SCAQMD prepared a CEQA document for the expansion of an existing oil production facility, with very small PM<sub>2.5</sub> increases (3.8 lb/day) and a very small affected population, staff elected not to use the CARB methodology for using estimated PM<sub>2.5</sub> emissions to derive a projected premature mortality number and explained why it would be inappropriate to do so. (*Id.* at pp 2-22 to 2-24.) SCAQMD staff concluded that use of this methodology for such a small source could result in unreliable findings and would not provide meaningful information. (*Id.* at pp. 2-23, 2-25.) This CEQA document was not challenged in court.

In the above case, while it may have been technically possible to plug the data into the methodology, the results would not have been reliable or meaningful. SCAQMD believes that an agency should not be required to perform analyses that do not produce reliable or meaningful results. This Court has already held that an agency may decline to use even the “normal” “existing conditions” CEQA baseline where to do so would be misleading or without informational value. (*Neighbors for Smart Rail v. Exposition Metro Line* (2013) 57 Cal.4th 439, 448, 457.) The same should be true for a decision that a particular study or analysis would not provide reliable or meaningful results.<sup>10</sup>

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<sup>10</sup> Whether a particular study would result in “informational value” is a part of deciding whether it is “feasible.” CEQA defines “feasible” as “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and



Therefore, it is not possible to set a hard-and-fast rule on whether a correlation of air quality impacts with specific quantifiable health impacts is required in all cases. Instead, the result turns on whether such an analysis is reasonably feasible in the particular case.<sup>11</sup> Moreover, what is reasonably feasible may change over time as scientists and regulatory agencies continually seek to improve their ability to predict health impacts. For example, CARB staff has been directed by its Governing Board to reassess and improve the methodology for estimating premature deaths. (California Air Resources Board, *Health Impacts Analysis: PM Mortality Relationship*, <http://www.arb.ca.gov/research/health/pm-mort/pm-mort.htm> (last reviewed Dec. 29, 2010).) This factor also counsels against setting any hard-and-fast rule in this case.

### **III. THE QUESTION OF WHETHER AN EIR CONTAINS SUFFICIENT ANALYSIS TO MEET CEQA'S REQUIREMENTS IS A MIXED QUESTION OF FACT AND LAW GOVERNED BY TWO DIFFERENT STANDARDS OF REVIEW.**

#### **A. Standard of Review for Feasibility Determination and Sufficiency as an Informative Document**

A second issue in this case is whether courts should review an EIR's informational sufficiency under the "substantial evidence" test as argued by Friant Ranch or the "independent judgment" test as argued by Sierra Club.

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technological factors." (Pub. Resources Code § 21061.1.) A study cannot be "accomplished in a *successful* manner" if it produces unreliable or misleading results.

<sup>11</sup> In this case, the lead agency did not have an opportunity to determine whether the requested analysis was feasible because the comment was non-specific. Therefore, SCAQMD suggests that this Court, after resolving the legal issues in the case, direct the Court of Appeal to remand the case to the lead agency for a determination of whether the requested analysis is feasible. Because Fresno County, the lead agency, did not seek review in this Court, it seems likely that the County has concluded that at least some level of correlation of air pollution with health impacts is feasible.



SCAQMD submits that the issue is more nuanced than either party contends. We submit that, whether a CEQA document includes sufficient analysis to satisfy CEQA's informational mandates is a mixed question of fact and law,<sup>13</sup> containing two levels of inquiry that should be judged by different standards.<sup>14</sup>

The state CEQA Guidelines set forth standards for the adequacy of environmental analysis. Guidelines Section 15151 states:

An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection, but for adequacy, completeness, and a good-faith effort at full disclosure.

In this case, the basic question is whether the underlying analysis of air quality impacts made the EIR "sufficient" as an informative document. However, whether the EIR's analysis was sufficient is judged in light of what was reasonably feasible. This represents a mixed question of fact and law that is governed by two different standards of review.

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<sup>13</sup> Friant Ranch actually states that the claim that an EIR lacks sufficient relevant information is, "most properly thought of as raising mixed questions of fact and law." (Opening Brief, p. 27.) However, the remainder of its argument claims that the court should apply the substantial evidence standard of review to all aspects of the issue.

<sup>14</sup> Mixed questions of fact and law issues may implicate predominantly factual subordinate questions that are reviewed under the substantial evidence test even though the ultimate question may be reviewed by the independent judgment test. *Crocker National Bank v. City and County of San Francisco* (1989) 49 Cal.3d 881, 888-889.

SCAQMD submits that an EIR's sufficiency as an informational document is ultimately a legal question that courts should determine using their independent judgment. This Court's language in *Laurel Heights I* supports this position. As this Court explained: "The court does not pass upon the correctness of the EIR's environmental conclusions, but only upon its *sufficiency as an informative document*." (*Laurel Heights I, supra*, 47 Cal.3d at 392-393) (emphasis added.) As described above, the Court in *Vineyard Area Citizens v. City of Rancho Cordova, supra*, 40 Cal.4th at 431, also used its independent judgment to determine what level of analysis CEQA requires for water supply impacts. The Court did not defer to the lead agency's opinion regarding the law's requirements; rather, it determined for itself what level of analysis was necessary to meet "[t]he law's informational demands." (*Id.* at p. 432.) Further, existing case law also holds that where an agency fails to comply with CEQA's information disclosure requirements, the agency has "failed to proceed in the manner required by law." (*Save Our Peninsula Comm. v. Monterey County Bd. of Supervisors* (2001) 87 Cal.App.4th 99, 118.)

However, whether an EIR satisfies CEQA's requirements depends in part on whether it was reasonably feasible for an agency to conduct additional or more thorough analysis. EIRs must contain "a detailed statement" of a project's impacts (Pub. Res. Code § 21061), and an agency must "use its best efforts to find out and disclose all that it reasonably can." (CEQA Guidelines § 15144.) Nevertheless, "the sufficiency of an EIR is to be reviewed in light of what is reasonably feasible." (CEQA Guidelines § 15151.)

SCAQMD submits that the question of whether additional analysis or a particular study suggested by a commenter is "feasible" is generally a question of fact. Courts have already held that whether a particular alternative is "feasible" is reviewed by the substantial evidence test.

(*Uphold Our Heritage v. Town of Woodside* (2007) 147 Cal.App.4th 587, 598-99; *Center for Biological Diversity v. County of San Bernardino* (2010) 185 Cal.App.4th 866, 883.) Thus, if a lead agency determines that a particular study or analysis is infeasible, that decision should generally be judged by the substantial evidence standard. However, SCAQMD urges this Court to hold that lead agencies must explain the basis of any determination that a particular analysis is infeasible in the EIR itself. An EIR must discuss information, including issues related to the feasibility of particular analyses “in sufficient detail to enable meaningful participation and criticism by the public. ‘[W]hatever is required to be considered in an EIR must be in that formal report; what any official might have known from other writings or oral presentations cannot supply what is lacking in the report.’” (*Laurel Heights I, supra*, 47 Cal.3d at p. 405 (quoting *Santiago County Water District v. County of Orange* (1981) 118 Cal.App.3d 818, 831) (discussing analysis of alternatives).) The evidence on which the determination is based should also be summarized in the EIR itself, with appropriate citations to reference materials if necessary. Otherwise commenting agencies such as SCAQMD would be forced to guess where the lead agency's evidence might be located, thus thwarting effective public participation.

Moreover, if a lead agency determines that a particular study or analysis would not result in reliable or useful information and for that reason is not feasible, that determination should be judged by the substantial evidence test. (See *Neighbors for Smart Rail v. Exposition Metro Line Construction Authority, supra*, 57 Cal.4th 439, 448, 457:

whether “existing conditions” baseline would be misleading or uninformative judged by substantial evidence standard.<sup>15</sup>)

If the lead agency’s determination that a particular analysis or study is not feasible is supported by substantial evidence, then the agency has not violated CEQA’s information disclosure provisions, since it would be infeasible to provide additional information. This Court’s decisions provide precedent for such a result. For example, this Court determined that the issue of whether the EIR should have included a more detailed discussion of future herbicide use was resolved because substantial evidence supported the agency’s finding that “the precise parameters of future herbicide use could not be predicted.” *Ebbetts Pass Forest Watch v. California Dept. of Forestry & Fire Protection* (2008) 43 Cal.4th 936, 955.

Of course, SCAQMD expects that courts will continue to hold lead agencies to their obligations to consult with, and not to ignore or misrepresent, the views of sister agencies having special expertise in the area of air quality. (*Berkeley Keep Jets Over the Bay v. Board of Port Commissioners* (2007) 91 Cal.App.4<sup>th</sup> 1344, 1364 n.11.) In some cases, information provided by such expert agencies may establish that the purported evidence relied on by the lead agency is not in fact “substantial”. (*Id.* at pp. 1369-1371.)

In sum, courts retain ultimate responsibility to determine what CEQA requires. However, the law does not require exhaustive analysis, but only what is reasonably feasible. Agencies deserve deference for their factual determinations regarding what type of analysis is reasonably feasible. On the other hand, if a commenter requests more information, and the lead agency declines to provide it but does *not* determine that the

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<sup>15</sup> The substantial evidence standard recognizes that the courts "have neither the resources nor the scientific expertise" to weigh conflicting evidence on technical issues. (*Laurel Heights I, supra*, 47 Cal.3d 376, 393.)

requested study or analysis would be infeasible, misleading or uninformative, the question becomes whether the omission of that analysis renders the EIR inadequate to satisfy CEQA's informational purposes. (*Id.* at pp. 1370-71.) Again, this is predominantly a question of law and should be judged by the de novo or independent judgment standard of review. Of course, this Court has recognized that a "project opponent or reviewing court can always imagine some additional study or analysis that might provide helpful information. It is not for them to design the EIR. That further study...might be helpful does not make it necessary." (*Laurel Heights I, supra*, 47 Cal.3d 376, 415 – see also CEQA Guidelines § 15204(a) [CEQA "does not require a lead agency to conduct every test. . . recommended or demanded by commenters."].) Courts, then, must adjudicate whether an omission of particular information renders an EIR inadequate to serve CEQA's informational purposes.<sup>16</sup>

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<sup>16</sup> We recognize that there is case law stating that the substantial evidence standard applies to "challenges to the scope of an EIR's analysis of a topic" as well as the methodology used and the accuracy of the data relied on in the document "because these types of challenges involve factual questions." (*Bakersfield Citizens for Local Control v. City of Bakersfield, supra*, 124 Cal.App.4<sup>th</sup> 1184, 1198, and cases relied on therein.) However, we interpret this language to refer to situations where the question of the scope of the analysis really is factual—that is, where it involves whether further analysis is feasible, as discussed above. This interpretation is supported by the fact that the *Bakersfield* court expressly rejected an argument that a claimed "omission of information from the EIR should be treated as inquiries whether there is substantial evidence supporting the decision approving the project." *Bakersfield, supra*, 124 Cal.App.4<sup>th</sup> at p. 1208. And the *Bakersfield* court ultimately decided that the lead agency must analyze the connection between the identified air pollution impacts and resulting health impacts, even though the EIR already included some discussion of air-pollution-related respiratory illnesses. *Bakersfield, supra*, 124 Cal.App.4<sup>th</sup> at p. 1220. Therefore, the court must not have interpreted this question as one of the "scope of the analysis" to be judged by the substantial evidence standard.

**B. Friant Ranch's Rationale for Rejecting the Independent Judgment Standard of Review is Unsupported by Case Law.**

In its brief, Friant Ranch makes a distinction between cases where a required CEQA topic is not discussed at all (to be reviewed by independent judgment as a failure to proceed in the manner required by law) and cases where a topic is discussed, but the commenter claims the information provided is insufficient (to be judged by the substantial evidence test). (Opening Brief, pp. 13-17.) The Court of Appeal recognized these two types of cases, but concluded that both raised questions of law. (*Sierra Club v. County of Fresno* (2014) 226 Cal.App.4th 704 (superseded by grant of review) 172 Cal.Rptr.3d 271, 290.) We believe the distinction drawn by Friant Ranch is unduly narrow, and inconsistent with cases which have concluded that CEQA documents are insufficient. In many instances, CEQA's requirements are stated broadly, and the courts must interpret the law to determine what level of analysis satisfies CEQA's mandate for providing meaningful information, even though the EIR discusses the issue to some extent.

For example, the CEQA Guidelines require discussion of the existing environmental baseline. In *County of Amador v. El Dorado County Water Agency* (1999) 76 Cal.App.4th 931, 954-955, the lead agency had discussed the environmental baseline by describing historic month-end water levels in the affected lakes. However, the court held that this was not an adequate baseline discussion because it failed to discuss the timing and amounts of past actual water releases, to allow comparison with the proposed project. The court evidently applied the independent judgment test to its decision, even though the agency discussed the issue to some extent.



Likewise, in *Vineyard Area Citizens* (2007) 40 Cal.4th 412, this Court addressed the question of whether an EIR's analysis of water supply impacts complied with CEQA. The parties agreed that the EIR was required to analyze the effects of providing water to the development project, "and that in order to do so the EIR had, in some manner, to identify the planned sources of that water." (*Vineyard Area Citizens, supra*, at p. 428.) However, the parties disagreed as to the level of detail required for this analysis and "what level of uncertainty regarding the availability of water supplies can be tolerated in an EIR . . . ." (*Id.*) In other words, the EIR had analyzed water supply impacts for the project, but the petitioner claimed that the analysis was insufficient.

This Court noted that neither CEQA's statutory language or the CEQA Guidelines specifically addressed the question of how precisely an EIR must discuss water supply impacts. (*Id.*) However, it explained that CEQA "states that '[w]hile foreseeing the unforeseeable is not possible, an agency must use its best efforts to find out and disclose all that it reasonably can.'" (*Id.*, [Guidelines § 15144].) The Court used this general principle, along with prior precedent, to elucidate four "principles for analytical adequacy" that are necessary in order to satisfy "CEQA's informational purposes." (*Vineyard Area Citizens, supra*, at p. 430.) The Court did not defer to the agency's determination that the EIR's analysis of water supply impacts was sufficient. Rather, this Court used its independent judgment to determine for itself the level of analysis required to satisfy CEQA's fundamental purposes. (*Vineyard Area Citizens, supra*, at p. 441: an EIR does not serve its purposes where it neglects to explain likely sources of water and "... leaves long term water supply considerations to later stages of the project.")

Similarly, the CEQA Guidelines require an analysis of noise impacts of the project. (Appendix G, “Environmental Checklist Form.”<sup>17</sup>) In *Gray v. County of Madera* (2008) 167 Cal.App.4th 1099, 1123, the court held that the lead agency’s noise impact analysis was inadequate even though it had addressed the issue and concluded that the increase would not be noticeable. If the court had been using the substantial evidence standard, it likely would have upheld this discussion.

Therefore, we do not agree that the issue can be resolved on the basis suggested by Friant Ranch, which would apply the substantial evidence standard to *every* challenge to an analysis that addresses a required CEQA topic. This interpretation would subvert the courts’ proper role in interpreting CEQA and determining what the law requires.

Nor do we agree that the Court of Appeal in this case violated CEQA’s prohibition on courts interpreting its provisions “in a manner which imposes procedural or substantive requirements beyond those explicitly stated in this division or in the state guidelines.” (Pub. Resources Code § 21083.1.) CEQA requires an EIR to describe *all* significant impacts of the project on the environment. (Pub. Resources Code § 21100(b)(2); *Vineyard Area Citizens, supra*, at p. 428.) Human beings are part of the environment, so CEQA requires EIRs to discuss a project’s significant impacts on human health. However, except in certain particular circumstances,<sup>18</sup> neither the CEQA statute nor Guidelines specify the precise level of analysis that agencies must undertake to satisfy the law’s requirements. (see, e.g., CEQA Guidelines § 15126.2(a) [EIRs must describe “health and safety problems caused by {a project’s} physical changes”].) Accordingly, courts must interpret CEQA as a whole to

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<sup>17</sup> Association of Environmental Professionals, 2015 CEQA Statute and Guidelines (2015) p.287.

<sup>18</sup> E.g., Pub. Resources Code § 21151.8(C)(3)(B)(iii) (requiring specific type of health risk analysis for siting schools).

determine whether a particular EIR is sufficient as an informational document. A court determining whether an EIR's discussion of human health impacts is legally sufficient does not constitute imposing a new substantive requirement.<sup>19</sup> Under Friant Ranch's theory, the above-referenced cases holding a CEQA analysis inadequate would have violated the law. This is not a reasonable interpretation.

#### **IV. COURTS MUST SCRUPULOUSLY ENFORCE THE REQUIREMENTS THAT LEAD AGENCIES CONSULT WITH AND OBTAIN COMMENTS FROM AIR DISTRICTS**

Courts must "scrupulously enforce" CEQA's legislatively mandated requirements. (*Vineyard Area Citizens, supra*, 40 Cal.4<sup>th</sup> 412, 435.) Case law has firmly established that lead agencies must consult with the relevant air pollution control district before conducting an initial study, and must provide the districts with notice of the intention to adopt a negative declaration (or EIR). (*Schenck v. County of Sonoma* (2011) 198 Cal.App.4th 949, 958.) As *Schenck* held, neither publishing the notice nor providing it to the State Clearinghouse was a sufficient substitute for sending notice directly to the air district. (*Id.*) Rather, courts "must be satisfied that [administrative] agencies have fully complied with the procedural requirements of CEQA, since only in this way can the important public purposes of CEQA be protected from subversion." *Schenck*, 198 Cal.App.4th at p. 959 (citations omitted).<sup>20</sup>

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<sup>19</sup> We submit that Public Resources Code Section 21083.1 was intended to prevent courts from, for example, holding that an agency must analyze economic impacts of a project where there are no resulting environmental impacts (see CEQA Guidelines § 15131), or imposing new procedural requirements, such as imposing additional public notice requirements not set forth in CEQA or the Guidelines.

<sup>20</sup> Lead agencies must consult air districts, as public agencies with jurisdiction by law over resources affected by the project, *before* releasing an EIR. (Pub. Resources Code §§ 21104(a); 21153.) Moreover, air

Lead agencies should be aware, therefore, that failure to properly seek and consider input from the relevant air district constitutes legal error which may jeopardize their project approvals. For example, the court in *Fall River Wild Trout Foundation v. County of Shasta*, (1999) 70 Cal.App.4th 482, 492 held that the failure to give notice to a trustee agency (Department of Fish and Game) was prejudicial error requiring reversal. The court explained that the lack of notice prevented the Department from providing any response to the CEQA document. (*Id.* at p. 492.) It therefore prevented relevant information from being presented to the lead agency, which was prejudicial error because it precluded informed decision-making. (*Id.*)<sup>21</sup>

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districts should be considered “state agencies” for purposes of the requirement to consult with “trustee agencies” as set forth in Public Resources Code § 20180.3(a). This Court has long ago held that the districts are not mere “local agencies” whose regulations are superseded by those of a state agency regarding matters of statewide concern, but rather have concurrent jurisdiction over such issues. (*Orange County Air Pollution Control District v. Public Util. Com.* (1971) 4 Cal.3d 945, 951, 954.) Since air pollution is a matter of statewide concern, *Id.* at 952, air districts should be entitled to trustee agency status in order to ensure that this vital concern is adequately protected during the CEQA process.

<sup>21</sup> In *Schenck*, the court concluded that failure to give notice to the air district was not prejudicial, but this was partly because the trial court had already corrected the error before the case arrived at the Court of Appeal. The trial court issued a writ of mandate requiring the lead agency to give notice to the air district. The air district responded by concurring with the lead agency that air impacts were not significant. (*Schenck*, 198 Cal.App.4th 949, 960.) We disagree with the *Schenck* court that the failure to give notice to the air district would not have been prejudicial (even in the absence of the trial court writ) merely because the lead agency purported to follow the air district’s published CEQA guidelines for significance. (*Id.*, 198 Cal.App.4th at p. 960.) In the first place, absent notice to the air district, it is uncertain whether the lead agency properly followed those guidelines. Moreover, it is not realistic to expect that an air district’s published guidelines would necessarily fully address all possible air-quality related issues that can arise with a CEQA project, or that those

Similarly, lead agencies must obtain additional information requested by expert agencies, including those with jurisdiction by law, if that information is necessary to determine a project's impacts. (*Sierra Club v. State Bd. Of Forestry* (1994) 7 Cal.4th 1215, 1236-37.) Approving a project without obtaining that information constitutes a failure to proceed in the manner prescribed by CEQA. (*Id.* at p. 1236.)

Moreover, a lead agency can save significant time and money by consulting with the air district early in the process. For example, the lead agency can learn what the air district recommends as an appropriate analysis on the facts of its case, including what kinds of health impacts analysis may be available, and what models are appropriate for use. This saves the lead agency from the need to do its analysis all over again and possibly needing to recirculate the document after errors are corrected, if new significant impacts are identified. (CEQA Guidelines § 15088.5(a).) At the same time, the air district's expert input can help the lead agency properly determine whether another commenter's request for additional analysis or studies is reasonable or feasible. Finally, the air district can provide input on what mitigation measures would be feasible and effective.

Therefore, we suggest that this Court provide guidance to lead agencies reminding them of the importance of consulting with the relevant air districts regarding these issues. Otherwise, their feasibility decisions may be vulnerable to air district evidence that establishes that there is no substantial evidence to support the lead agency decision not to provide specific analysis. (*See Berkeley Keep Jets Over the Bay, supra*, 91 Cal.App.4th 1344, 1369-1371.)

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guidelines would necessarily be continually modified to reflect new developments. Therefore we believe that, had the trial court not already ordered the lead agency to obtain the air district's views, the failure to give notice would have been prejudicial, as in *Fall River, supra*, 70 Cal.App.4th 482, 492.

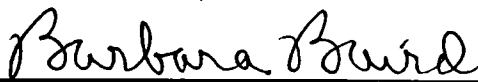
## CONCLUSION

The SCAQMD respectfully requests this Court *not* to establish a hard-and-fast rule concerning whether CEQA requires a lead agency to correlate identified air quality impacts of a project with resulting health outcomes. Moreover, the question of whether an EIR is “sufficient as an informational document” is a mixed question of fact and law containing two levels of inquiry. Whether a particular proposed analysis is feasible is predominantly a question of fact to be judged by the substantial evidence standard of review. Where the requested analysis is feasible, but the lead agency relies on legal or policy reasons not to provide it, the question of whether the EIR is nevertheless sufficient as an informational document is predominantly a question of law to be judged by the independent judgment standard of review.

Respectfully submitted,

DATED: April 3, 2015

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MANAGEMENT DISTRICT  
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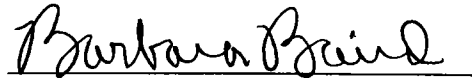
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## CERTIFICATE OF WORD COUNT

Pursuant to Rule 8.520(c)(1) of the California Rules of Court, I hereby certify that this brief contains 8,476 words, including footnotes, but excluding the Application, Table of Contents, Table of Authorities, Certificate of Service, this Certificate of Word Count, and signature blocks. I have relied on the word count of the Microsoft Word Vista program used to prepare this Certificate.

DATED: April 3, 2015

Respectfully submitted,

  
Barbara Baird

**PROOF OF SERVICE**

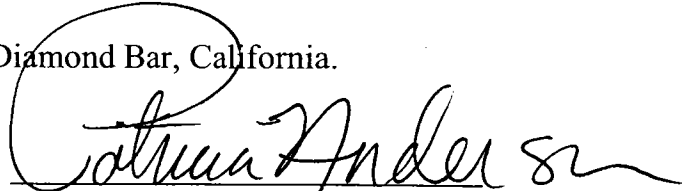
I am employed in the County of Los Angeles, California. I am over the age of 18 years and not a party to the within action. My business address is 21865 Copley Drive, Diamond Bar, California 91765.

On April 3, 2015 I served true copies of the following document(s) described as **APPLICATION OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT FOR LEAVE TO FILE BRIEF OF *AMICUS CURIAE* IN SUPPORT OF NEITHER PARTY AND [PROPOSED] BRIEF OF *AMICUS CURIAE*** by placing a true copy of the foregoing document(s) in a sealed envelope addressed as set forth on the attached service list as follows:

**BY MAIL:** I enclosed the document(s) in a sealed envelope or package addressed to the persons at the addresses listed in the Service List and placed the envelope for collection and mailing following our ordinary business practices. I am readily familiar with this District's practice for collection and processing of correspondence for mailing. Under that practice, the correspondence would be deposited with the United States Postal Service, with postage thereon fully prepaid at Diamond Bar, California, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on April 3, 2015 at Diamond Bar, California.

  
Patricia Anderson



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County of Fresno  
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**SJVAPCD**

**SIERRA CLUB v. COUNTY OF FRESNO**

**AMICUS BRIEF**

SUPREME COURT COPY

CASE NO. S219783

IN THE SUPREME COURT OF CALIFORNIA

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SIERRA CLUB, REVIVE THE SAN JOAQUIN, and  
LEAGUE OF WOMEN VOTERS OF FRESNO,  
*Plaintiffs and Appellants*

v.

COUNTY OF FRESNO,  
*Defendant and Respondent*

FRIANT RANCH, L.P.,  
*Real Party in Interest and Respondent*

SUPREME COURT  
FILED

APR 13 2015

Frank A. McGuire Clerk  
Deputy

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After a Decision by the Court of Appeal, filed May 27, 2014  
Fifth Appellate District Case No. F066798

Appeal from the Superior Court of California, County of Fresno  
Case No. 11CECG00726

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**APPLICATION FOR LEAVE TO FILE AMICUS CURIAE BRIEF OF  
SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT IN  
SUPPORT OF DEFENDANT AND RESPONDENT, COUNTY OF FRESNO AND  
REAL PARTY IN INTEREST AND RESPONDENT, FRIANT RANCH, L.P.**

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CASE NO. S219783

IN THE SUPREME COURT OF CALIFORNIA

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SIERRA CLUB, REVIVE THE SAN JOAQUIN, and  
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**APPLICATION FOR LEAVE TO FILE AMICUS CURIAE BRIEF OF  
SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT IN  
SUPPORT OF DEFENDANT AND RESPONDENT, COUNTY OF FRESNO AND  
REAL PARTY IN INTEREST AND RESPONDENT, FRIANT RANCH, L.P.**

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## APPLICATION

Pursuant to California Rules of Court 8.520(f)(1), proposed Amicus Curiae San Joaquin Valley Unified Air Pollution Control District hereby requests permission from the Chief Justice to file an amicus brief in support of Defendant and Respondent, County of Fresno, and Defendant and Real Parties in Interest Friant Ranch, L.P. Pursuant to Rule 8.520(f)(5) of the California Rules of Court, the proposed amicus curiae brief is combined with this Application. The brief addresses the following issue certified by this Court for review:

Is an EIR adequate when it identifies the health impacts of air pollution and quantifies a project's expected emissions, or does CEQA further require the EIR to *correlate* a project's air quality emissions to specific health impacts?

As of the date of this filing, the deadline for the final reply brief on the merits was March 5, 2015. Accordingly, under Rule 8.520(f)(2), this application and brief are timely.

### **1. Background and Interest of San Joaquin Valley Unified Air Pollution Control District**

The San Joaquin Valley Unified Air Pollution Control District ("Air District") regulates air quality in the eight counties comprising the San Joaquin Valley ("Central Valley"): Kern, Tulare, Madera, Fresno, Merced, San Joaquin, Stanislaus, and Kings, and is primarily responsible for attaining air quality standards within its jurisdiction. After billions of dollars of investment by Central Valley businesses, pioneering air quality regulations, and consistent efforts by residents, the Central Valley air basin has made historic improvements in air quality.

The Central Valley's geographical, topographical and meteorological features create exceptionally challenging air quality

conditions. For example, it receives air pollution transported from the San Francisco Bay Area and northern Central Valley communities, and the southern portion of the Central Valley includes three mountain ranges (Sierra, Tehachapi, and Coastal) that, under some meteorological conditions, effectively trap air pollution. Central Valley air pollution is only a fraction of what the Bay Area and Los Angeles produce, but these natural conditions result in air quality conditions that are only marginally better than Los Angeles, even though about ten times more pollution is emitted in the Los Angeles region. Bay Area air quality is much better than the Central Valley's, even though the Bay Area produces about six times more pollution. The Central Valley also receives air pollution transported from the Bay Area and northern counties in the Central Valley, including Sacramento, and transboundary anthropogenic ozone from as far away as China.

Notwithstanding these challenges, the Central Valley has reduced emissions at the same or better rate than other areas in California and has achieved unparalleled milestones in protecting public health and the environment:

- In the last decade, the Central Valley became the first air basin classified by the federal government under the Clean Air Act as a “serious nonattainment” area to come into attainment of health-based National Ambient Air Quality Standard (“NAAQS”) for coarse particulate matter (PM10), an achievement made even more notable given the Valley’s extensive agricultural sector. Unhealthy levels of particulate matter can cause and exacerbate a range of chronic and acute illnesses.
- In 2013, the Central Valley became the first air basin in the country to improve from a federal designation of “extreme” nonattainment to

actually attain (and quality for an attainment designation) of the 1-hour ozone NAAQS; ozone creates “smog” and, like PM10, causes adverse health impacts.

- The Central Valley also is in full attainment of federal standards for lead, nitrogen dioxide, sulfur dioxide, and carbon monoxide.
- The Central Valley continues to make progress toward compliance with its last two attainment standards, with the number of exceedences for the 8-hour ozone NAAQS reduced by 74% (for the 1997 standard) and 38% (for the 2008 standard) since 1991, and for the small particulate matter (PM2.5) NAAQS reduced by 85% (for the 1997 standard) and 61% (for the 2006 standard).

Sustained improvement in Central Valley air quality requires a rigorous and comprehensive regulatory framework that includes prohibitions (e.g., on wood-burning fireplaces in new residences), mandates (e.g., requiring the installation of best available pollution reduction technologies on new and modified equipment and industrial operations), innovations (e.g., fees assessed against residential development to fund pollution reduction actions to “offset” vehicular emissions associated with new residences), incentive programs (e.g., funding replacements of older, more polluting heavy duty trucks and school buses)<sup>1</sup>, ongoing planning for continued air quality improvements, and enforcement of Air District permits and regulations.

The Air District is also an expert air quality agency for the eight counties and cities in the San Joaquin Valley. In that capacity, the Air District has developed air quality emission guidelines for use by the Central

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<sup>1</sup> San Joaquin’s incentive program has been so successful that through 2012, it has awarded over \$ 432 million in incentive funds and has achieved 93,349 tons of lifetime emissions reductions. See SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT, 2012 PM2.5 PLAN, 6-6 (2012) available at <http://www.valleyair.org/Workshops/postings/2012/12-20-12PM25/FinalVersion/06%20Chapter%206%20Incentives.pdf>.

Valley counties and cities that implement the California Environment Quality Act (CEQA).<sup>2</sup> In its guidance, the Air District has distinguished between toxic air contaminants and criteria air pollutants.<sup>3</sup> Recognizing this distinction, the Air District's CEQA Guidance has adopted distinct thresholds of significance for *criteria* pollutants (i.e., ozone, PM2.5 and their respective precursor pollutants) based upon scientific and factual data which demonstrates the level that can be accommodated on a cumulative basis in the San Joaquin Valley without affecting the attainment of the applicable NAAQS.<sup>4</sup> For *toxic air* pollutants, the District has adopted different thresholds of significance which scientific and factual data demonstrates has the potential to expose sensitive receptors (i.e., children, the elderly) to levels which may result in localized health impacts.<sup>5</sup>

The Air District's CEQA Guidance was followed by the County of Fresno in its environment review of the Friant Ranch project, for which the Air District also served as a commenting agency. The Court of Appeal's holding, however, requiring correlation between the project's criteria

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<sup>2</sup> See, e.g., SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT, PLANNING DIVISION, GUIDE FOR ASSESSING AND MITIGATING AIR QUALITY IMPACTS (2015), available at [http://www.valleyair.org/transportation/GAMAQI\\_3-19-15.pdf](http://www.valleyair.org/transportation/GAMAQI_3-19-15.pdf) ("CEQA Guidance").

<sup>3</sup> Toxic air contaminants, also known as hazardous air pollutants, are those pollutants that are known or suspected to cause cancer or other serious health effects, such as birth defects. There are currently 189 toxic air contaminants regulated by the United States Environmental Protection Agency ("EPA") and the states pursuant to the Clean Air Act. 42 U.S.C. § 7412. Common TACs include benzene, perchloroethylene and asbestos. *Id.* at 7412(b).

In contrast, there are only six (6) criteria air pollutants: ozone, particulate matter, carbon monoxide, nitrogen oxides, sulfur dioxide and lead. Although criteria air pollutants can also be harmful to human health, they are distinguishable from toxic air contaminants and are regulated separately. For instance, while criteria pollutants are regulated by numerous sections throughout Title I of the Clean Air Act, the regulation of toxic air contaminants occurs solely under section 112 of the Act. Compare 42 U.S.C. §§ 7407 – 7411 & 7501 – 7515 with 42 U.S.C. § 7411.

<sup>4</sup> See, e.g., CEQA Guidance at [http://www.valleyair.org/transportation/GAMAQI\\_3-19-15.pdf](http://www.valleyair.org/transportation/GAMAQI_3-19-15.pdf), pp. 64-66, 80.

<sup>5</sup> See, e.g., CEQA Guidance at [http://www.valleyair.org/transportation/GAMAQI\\_3-19-15.pdf](http://www.valleyair.org/transportation/GAMAQI_3-19-15.pdf), pp. 66, 99-101.



pollutants and local health impacts, departs from the Air District's Guidance and approved methodology for assessing criteria pollutants. A close reading of the administrative record that gave rise to this issue demonstrates that the Court's holding is based on a misunderstanding of the distinction between toxic air contaminants (for which a local health risk assessment is feasible and routinely performed) and criteria air pollutants (for which a local health risk assessment is not feasible and would result in speculative results).<sup>6</sup> The Air District has a direct interest in ensuring the lawfulness and consistent application of its CEQA Guidance, and will explain how the Court of Appeal departed from the Air District's long-standing CEQA Guidance in addressing criteria pollutants and toxic air contaminants in this amicus brief.

## **2. How the Proposed Amicus Curiae Brief Will Assist the Court**

As counsel for the proposed amicus curiae, we have reviewed the briefs filed in this action. In addition to serving as a "commentary agency" for CEQA purposes over the Friant Ranch project, the Air District has a strong interest in assuring that CEQA is used for its intended purpose, and believes that this Court would benefit from additional briefing explaining the distinction between criteria pollutants and toxic air contaminants and the different methodologies employed by local air pollution control agencies such as the Air District to analyze these two categories of air pollutants under CEQA. The Air District will also explain how the Court of Appeal's opinion is based upon a fundamental misunderstanding of these two different approaches by requiring the County of Fresno to correlate the project's *criteria* pollution emissions with *local* health impacts. In doing

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<sup>6</sup> CEQA does not require speculation. *See, e.g., Laurel Heights Improvement Ass'n v. Regents of Univ. of Cal.*, 6 Cal. 4th 1112, 1137 (1993) (upholding EIR that failed to evaluate cumulative toxic air emission increases given absence of any acceptable means for doing so).

so, the Air District will provide helpful analysis to support its position that at least insofar as criteria pollutants are concerned, CEQA does not require an EIR to correlate a project's air quality emissions to specific health impacts, because such an analysis is not reasonably feasible.

**Rule 8.520 Disclosure**

Pursuant to Cal. R. 8.520(f)(4), neither the Plaintiffs nor the Defendant or Real Party In Interest or their respective counsel authored this brief in whole or in part. Neither the Plaintiffs nor the Defendant or Real Party in Interest or their respective counsel made any monetary contribution towards or in support of the preparation of this brief.

**CONCLUSION**

On behalf of the San Joaquin Valley Unified Air Pollution Control District, we respectfully request that this Court accept the filing of the attached brief.

Dated: April 2, 2015



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SAN JOAQUIN VALLEY UNIFIED  
AIR POLLUTION CONTROL  
DISTRICT

CASE NO. S219783

IN THE SUPREME COURT OF CALIFORNIA

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SIERRA CLUB, REVIVE THE SAN JOAQUIN, and  
LEAGUE OF WOMEN VOTERS OF FRESNO,  
*Plaintiffs and Appellants*

v.

COUNTY OF FRESNO,  
*Defendant and Respondent*

FRIANT RANCH, L.P.,  
*Real Party in Interest and Respondent*

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After a Decision by the Court of Appeal, filed May 27, 2014  
Fifth Appellate District Case No. F066798

Appeal from the Superior Court of California, County of Fresno  
Case No. 11CECG00726

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**AMICUS CURIAE BRIEF OF  
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SUPPORT OF DEFENDANT AND RESPONDENT, COUNTY OF FRESNO AND  
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## I. INTRODUCTION.

The San Joaquin Valley Unified Air Pollution Control District (“Air District”) respectfully submits that the Court of Appeal erred when it held that the air quality analysis contained in the Environmental Impact Report (“EIR”) for the Friant Ranch development project was inadequate under the California Environmental Quality Act (“CEQA”) because it did not include an analysis of the correlation between the project’s criteria air pollutants and the potential adverse human health impacts. A close reading of the portion of the administrative record that gave rise to this issue demonstrates that the Court’s holding is based on a misunderstanding of the distinction between toxic air contaminants and criteria air pollutants.

Toxic air contaminants, also known as hazardous air pollutants, are those pollutants that are known or suspected to cause cancer or other serious health effects, such as birth defects. There are currently 189 toxic air contaminants (hereinafter referred to as “TACs”) regulated by the United States Environmental Protection Agency (“EPA”) and the states pursuant to the Clean Air Act. 42 U.S.C. § 7412. Common TACs include benzene, perchloroethylene and asbestos. *Id.* at 7412(b).

In contrast, there are only six (6) criteria air pollutants: ozone, particulate matter, carbon monoxide, nitrogen oxides, sulfur dioxide and lead. Although criteria air pollutants can also be harmful to human health,



they are distinguishable from TACs and are regulated separately. For instance, while criteria pollutants are regulated by numerous sections throughout Title I of the Clean Air Act, the regulation of TACs occurs solely under section 112 of the Act. *Compare* 42 U.S.C. §§ 7407 – 7411 & 7501 – 7515 *with* 42 U.S.C. § 7411.

The most relevant difference between criteria pollutants and TACs for purposes of this case is the manner in which human health impacts are accounted for. While it is common practice to analyze the correlation between an individual facility's TAC emissions and the expected localized human health impacts, such is not the case for criteria pollutants. Instead, the human health impacts associated with criteria air pollutants are analyzed and taken into consideration when EPA sets the national ambient air quality standard ("NAAQS") for each criteria pollutant. 42 U.S.C. § 7409(b)(1). The health impact of a particular criteria pollutant is analyzed on a regional and not a facility level based on how close the area is to complying with (attaining) the NAAQS. Accordingly, while the type of individual facility / health impact analysis that the Court of Appeal has required is a customary practice for TACs, it is not feasible to conduct a similar analysis for criteria air pollutants because currently available computer modeling tools are not equipped for this task.

It is clear from a reading of both the administrative record and the Court of Appeal's decision that the Court did not have the expertise to fully

appreciate the difference between TACs and criteria air pollutants. As a result, the Court has ordered the County of Fresno to conduct an analysis that is not practicable and not likely yield valid information. The Air District respectfully requests that this portion of the Court of Appeal's decision be reversed.

**II. THE COURT OF APPEAL ERRED IN FINDING THE FRIANT RANCH EIR INADEQUATE FOR FAILING TO ANALYZE THE SPECIFIC HUMAN HEALTH IMPACTS ASSOCIATED CRITERIA AIR POLLUTANTS.**

Although the Air District does not take lightly the amount of air emissions at issue in this case, it submits that the Court of Appeal got it wrong when it required Fresno County to revise the Friant Ranch EIR to include an analysis correlating the criteria air pollutant emissions associated with the project with specific, localized health-impacts. The type of analysis the Court of Appeal has required will not yield reliable information because currently available modeling tools are not well suited for this task. Further, in reviewing this issue de novo, the Court of Appeal failed to appreciate that it lacked the scientific expertise to appreciate the significant differences between a health risk assessment commonly performed for toxic air contaminants and a similar type of analysis it felt should have been conducted for criteria air pollutants.

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**A. Currently Available Modeling Tools are not Equipped to Provide a Meaningful Analysis of the Correlation between an Individual Development Project's Air Emissions and Specific Human Health Impacts.**

In order to appreciate the problematic nature of the Court of Appeals' decision requiring a health risk type analysis for criteria air pollutants, it is important to understand how the relevant criteria pollutants (ozone and particulate matter) are formed, dispersed and regulated.

Ground level ozone (smog) is not directly emitted into the air, but is formed when precursor pollutants such as oxides of nitrogen (NO<sub>x</sub>) and volatile organic compounds (VOCs) are emitted into the atmosphere and undergo complex chemical reactions in the process of sunlight.<sup>1</sup> Once formed, ozone can be transported long distances by wind.<sup>2</sup> Because of the complexity of ozone formation, a specific tonnage amount of NO<sub>x</sub> or VOCs emitted in a particular area does not equate to a particular concentration of ozone in that area. In fact, even rural areas that have relatively low tonnages of emissions of NO<sub>x</sub> or VOCs can have high levels of ozone concentration simply due to wind transport.<sup>3</sup> Conversely, the San Francisco Bay Area has six times more NO<sub>x</sub> and VOC emissions per square mile than the San Joaquin Valley, but experiences lower

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<sup>1</sup> See United States Environmental Protection Agency, *Ground-level Ozone: Basic Information*, available at: <http://www.epa.gov/airquality/ozonepollution/basic.html> (visited March 10, 2015).

<sup>2</sup> *Id.*

<sup>3</sup> *Id.*

concentrations of ozone (and better air quality) simply because sea breezes disperse the emissions.<sup>4</sup>

Particulate matter (“PM”) can be divided into two categories: directly emitted PM and secondary PM.<sup>5</sup> While directly emitted PM can have a localized impact, the tonnage emitted does not always equate to the local PM concentration because it can be transported long distances by wind.<sup>6</sup> Secondary PM, like ozone, is formed via complex chemical reactions in the atmosphere between precursor chemicals such as sulfur dioxides (SO<sub>x</sub>) and NO<sub>x</sub>.<sup>7</sup> Because of the complexity of secondary PM formation, the tonnage of PM-forming precursor emissions in an area does not necessarily result in an equivalent concentration of secondary PM in that area.

The disconnect between the *tonnage* of precursor pollutants (NO<sub>x</sub>, SO<sub>x</sub> and VOCs) and the *concentration* of ozone or PM formed is important because it is not necessarily the tonnage of precursor pollutants that causes human health effects, but the concentration of resulting ozone or PM. Indeed, the national ambient air quality standards (“NAAQS”), which are statutorily required to be set by the United States Environmental Protection

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<sup>4</sup> *San Joaquin Valley Air Pollution Control District 2007 Ozone Plan*, Executive Summary p. ES-6, available at: [http://www.valleyair.org/Air\\_Quality\\_Plans/docs/AQ\\_Ozone\\_2007\\_Adopted/03%20Executive%20Summary.pdf](http://www.valleyair.org/Air_Quality_Plans/docs/AQ_Ozone_2007_Adopted/03%20Executive%20Summary.pdf) (visited March 10, 2015).

<sup>5</sup> United States Environmental Protection Agency, *Particulate Matter: Basic Information*, available at: <http://www.epa.gov/airquality/particlepollution/basic.html> (visited March 10, 2015).

<sup>6</sup> *Id.*

<sup>7</sup> *Id.*

Agency (“EPA”) at levels that are “requisite to protect the public health,” 42 U.S.C. § 7409(b)(1), are established as concentrations of ozone or particulate matter and not as tonnages of their precursor pollutants.<sup>8</sup>

Attainment of a particular NAAQS occurs when the concentration of the relevant pollutant remains below a set threshold on a consistent basis throughout a particular region. For example, the San Joaquin Valley attained the 1-hour ozone NAAQS when ozone concentrations remained at or below 0.124 parts per million Valley-wide on 3 or fewer days over a 3-year period.<sup>9</sup> Because the NAAQS are focused on achieving a particular concentration of pollution region-wide, the Air District’s tools and plans for attaining the NAAQS are regional in nature.

For instance, the computer models used to simulate and predict an attainment date for the ozone or particulate matter NAAQS in the San Joaquin Valley are based on regional inputs, such as regional inventories of precursor pollutants (NO<sub>x</sub>, SO<sub>x</sub> and VOCs) and the atmospheric chemistry and meteorology of the Valley.<sup>10</sup> At a very basic level, the models simulate future ozone or PM levels based on predicted changes in precursor

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<sup>8</sup> See, e.g., United States Environmental Protection Agency, *Table of National Ambient Air Quality Standards*, available at: <http://www.epa.gov/air/criteria.html#3> (visited March 10, 2015).

<sup>9</sup> *San Joaquin Valley Unified Air Pollution Control District 2013 Plan for the Revoked 1-Hour Ozone Standard*, Ch. 2 p. 2-16, available at: [http://www.valleyair.org/Air\\_Quality\\_Plans/OzoneOneHourPlan2013/02Chapter2ScienceTrendsModeling.pdf](http://www.valleyair.org/Air_Quality_Plans/OzoneOneHourPlan2013/02Chapter2ScienceTrendsModeling.pdf) (visited March 10, 2015).

<sup>10</sup> *Id.* at Ch. 2 p. 2-19 (visited March 12, 2015); *San Joaquin Valley Unified Air Pollution Control District 2008 PM<sub>2.5</sub> Plan*, Appendix F, pp. F-2 – F-5, available at: [http://www.valleyair.org/Air\\_Quality\\_Plans/docs/AQ\\_Final\\_Adopted\\_PM2.5/20%20Appendix%20F.pdf](http://www.valleyair.org/Air_Quality_Plans/docs/AQ_Final_Adopted_PM2.5/20%20Appendix%20F.pdf) (visited March 19, 2015).

emissions Valley wide.<sup>11</sup> Because the NAAQS are set levels necessary to protect human health, the closer a region is to attaining a particular NAAQS, the lower the human health impact is from that pollutant.

The goal of these modeling exercises is not to determine whether the emissions generated by a particular factory or development project will affect the date that the Valley attains the NAAQS. Rather, the Air District's modeling and planning strategy is regional in nature and based on the extent to which *all* of the emission-generating sources in the Valley (current and future) must be controlled in order to reach attainment.<sup>12</sup>

Accordingly, the Air District has based its thresholds of significance for CEQA purposes on the levels that scientific and factual data demonstrate that the Valley can accommodate without affecting the attainment date for the NAAQS.<sup>13</sup> The Air District has tied its CEQA significance thresholds to the level at which stationary pollution sources permitted by the Air District must "offset" their emissions.<sup>14</sup> This "offset"

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<sup>11</sup> *Id.*

<sup>12</sup> Although the Air District does have a dispersion modeling tool used during its air permitting process that is used to predict whether a particular project's directly emitted PM will either cause an exceedance of the PM NAAQS or contribute to an existing exceedance, this model bases the prediction on a worst case scenario of emissions and meteorology and has no provision for predicting any associated human health impacts. Further, this analysis is only performed for stationary sources (factories, oil refineries, etc.) that are required to obtain a New Source Review permit from the Air District and not for development projects such as Friant Ranch over which the Air District has no preconstruction permitting authority. See San Joaquin Valley Unified Air Pollution Control District Rule 2201 §§ 2.0; 3.3.9; 4.14.1, available at: <http://www.valleyair.org/rules/currntrules/Rule22010411.pdf> (visited March 19, 2015).

<sup>13</sup> *San Joaquin Valley Unified Air Pollution Control District Guide to Assessing and Mitigating Air Quality Impacts*, (March 19, 2015) p. 22, available at: <http://www.valleyair.org/transportation/CEQA%20Rules/GAMAQI%20Jan%202002%20Rev.pdf> (visited March 30, 2015).

<sup>14</sup> *Id.* at pp. 22, 25.

level allows for growth while keeping the cumulative effects of all new sources at a level that will not impede attainment of the NAAQS.<sup>15</sup> In the Valley, these thresholds are 15 tons per year of PM, and 10 tons of NOx or VOC per year. *Sierra Club, supra*, 172 Cal.Rptr.3d at 303; AR 4554. Thus, the CEQA air quality analysis for criteria pollutants is not really a localized, project-level impact analysis but one of regional, “cumulative impacts.”

Accordingly, the significance thresholds applied in the Friant Ranch EIR (15 tons per year of PM and 10 tons of NOx or VOCs) are not intended to be indicative of any localized human health impact that the project may have. While the health effects of air pollution are of primary concern to the Air District (indeed, the NAAQS are established to protect human health), the Air District is simply not equipped to analyze whether and to what extent the criteria pollutant emissions of an individual CEQA project directly impact human health in a particular area. This is true even for projects with relatively high levels of emissions of criteria pollutant precursor emissions.

For instance, according to the EIR, the Friant Ranch project is estimated to emit 109.52 tons per year of ROG (VOC), 102.19 tons per year of NOx, and 117.38 tons per year of PM. Although these levels well

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<sup>15</sup> *San Joaquin Valley Unified Air Pollution Control District Environmental Review Guidelines* (Aug. 2000) p. 4-11, available at: [http://www.valleyair.org/transportation/CEQA%20Rules/ERG%20Adopted%20August%202000\\_.pdf](http://www.valleyair.org/transportation/CEQA%20Rules/ERG%20Adopted%20August%202000_.pdf) (visited March 12, 2015).

exceed the Air District's CEQA significance thresholds, this does not mean that one can easily determine the concentration of ozone or PM that will be created at or near the Friant Ranch site on a particular day or month of the year, or what specific health impacts will occur. Meteorology, the presence of sunlight, and other complex chemical factors all combine to determine the ultimate concentration and location of ozone or PM. This is especially true for a project like Friant Ranch where most of the criteria pollutant emissions derive not from a single "point source," but from area wide sources (consumer products, paint, etc.) or mobile sources (cars and trucks) driving to, from and around the site.

In addition, it would be extremely difficult to model the impact on NAAQS attainment that the emissions from the Friant Ranch project may have. As discussed above, the currently available modeling tools are equipped to model the impact of *all* emission sources in the Valley on attainment. According to the most recent EPA-approved emission inventory, the NO<sub>x</sub> inventory for the Valley is for the year 2014 is 458.2 tons per day, or 167,243 tons per year and the VOC (or ROG) inventory is 361.7 tons per day, or 132,020.5 tons per year.<sup>16</sup> Running the photochemical grid model used for predicting ozone attainment with the

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<sup>16</sup> *San Joaquin Valley Unified Air Pollution Control District 2007 Ozone Plan*, Appendix B pp. B-6, B-9, available at: [http://www.valleyair.org/Air\\_Quality\\_Plans/docs/AO\\_Ozone\\_2007\\_Adopted/19%20Appendix%20B%20April%202007.pdf](http://www.valleyair.org/Air_Quality_Plans/docs/AO_Ozone_2007_Adopted/19%20Appendix%20B%20April%202007.pdf) (visited March 12, 2015).



emissions solely from the Friant Ranch project (which equate to less than one-tenth of one percent of the total NOx and VOC in the Valley) is not likely to yield valid information given the relative scale involved.

Finally, even once a model is developed to accurately ascertain local increases in concentrations of photochemical pollutants like ozone and some particulates, it remains impossible, using today's models, to correlate that increase in concentration to a specific health impact. The reason is the same: such models are designed to determine regional, population-wide health impacts, and simply are not accurate when applied at the local level.

For these reasons, it is not the norm for CEQA practitioners, including the Air District, to conduct an analysis of the localized health impacts associated with a project's criteria air pollutant emissions as part of the EIR process. When the accepted scientific method precludes a certain type of analysis, "the court cannot impose a legal standard to the contrary." *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 717 n. 8. However, that is exactly what the Court of Appeal has done in this case. Its decision upends the way CEQA air quality analysis of criteria pollutants occurs and should be reversed.

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**B. The Court of Appeal Improperly Extrapolated a Request for a Health Risk Assessment for Toxic Air Contaminants into a Requirement that the EIR contain an Analysis of Localized Health Impacts Associated with Criteria Air Pollutants.**

The Court of Appeal's error in requiring the new health impact analysis for criteria air pollutants clearly stems from a misunderstanding of terms of art commonly used in the air pollution field. More specifically, the Court of Appeal (and Appellants Sierra Club et al.) appear to have confused the health risk analysis ("HRA") performed to determine the health impacts associated with a project's toxic air contaminants ("TACs"), with an analysis correlating a project's criteria air pollutants (ozone, PM and the like) with specific localized health impacts.

The first type of analysis, the HRA, is commonly performed during the Air District's stationary source permitting process for projects that emit TACs and is, thus, incorporated into the CEQA review process. An HRA is a comprehensive analysis to evaluate and predict the dispersion of TACs emitted by a project and the potential for exposure of human populations. It also assesses and quantifies both the individual and population-wide health risks associated with those levels of exposure. There is no similar analysis conducted for criteria air pollutants. Thus, the second type of analysis (required by the Court of Appeal), is not currently part of the Air District's process because, as outlined above, the health risks associated

with exposure to criteria pollutants are evaluated on a regional level based on the region's attainment of the NAAQS.

The root of this confusion between the types of analyses conducted for TACs versus criteria air pollutants appears to stem from a comment that was presented to Fresno County by the City of Fresno during the administrative process.

In its comments on the draft EIR, the City of Fresno (the only party to raise this issue) stated:

[t]he EIR must disclose the human health related effects of the Project's air pollution impacts. (CEQA Guidelines section 15126.2(a).) The EIR fails completely in this area. The EIR should be revised to disclose and determine the significance of TAC impacts, and of human health risks due to exposure to Project-related air emissions.

(AR 4602.)

In determining that the issue regarding the correlation between the Friant Ranch project's criteria air pollutants and adverse health impacts was adequately exhausted at the administrative level, the Court of Appeal improperly read the first two sentences of the City of Fresno's comment in isolation rather than in the context of the entire comment. *See Sierra Club v. County of Fresno* (2014) 172 Cal.Rptr.3d 271, 306. Although the comment first speaks generally in terms of "human health related effects" and "air pollution," it requests only that the EIR be revised to disclose "the significance of TACs" and the "human health risks due to exposure."

The language of this request in the third sentence of the comment is significant because, to an air pollution practitioner, the language would only have indicated only that a HRA for TACs was requested, and not a separate analysis of the health impacts associated with the project's criteria air pollutants. Fresno County clearly read the comment as a request to perform an HRA for TACs and limited its response accordingly. (AR 4602.)<sup>17</sup> The Air District submits that it would have read the City's comment in the same manner as the County because the City's use of the terms "human health risks" and "TACs" signal that an HRA for TACs is being requested. Indeed, the Air District was also concerned that an HRA be conducted, but understood that it was not possible to conduct such an analysis until the project entered the phase where detailed site specific information, such as the types of emission sources and the proximity of the sources to sensitive receptors became available. (AR 4553.)<sup>18</sup> The City of Fresno was apparently satisfied with the County's discussion of human health risks, as it did not raise the issue again when it commented on the final EIR. (AR 8944 – 8960.)

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<sup>17</sup> Appellants do not challenge the manner in which the County addressed TACs in the EIR. (Appellants' Answer Brief p. 28 fn. 7.)

<sup>18</sup> Appellants rely on the testimony of Air District employee, Dan Barber, as support for their position that the County should have conducted an analysis correlating the project's criteria air pollutant emissions with localized health impacts. (Appellants Answer Brief pp. 10-11; 28.) However, Mr. Barber's testimony simply reinforces the Air District's concern that a risk assessment (HRA) be conducted once the actual details of the project become available. (AR 8863.) As to criteria air pollutants, Mr. Barber's comments are aimed at the Air District's concern about the amount of emissions and the fact that the emissions will make it "more difficult for Fresno County and the Valley to reach attainment which means that the health of Valley residents maybe [sic] adversely impacted." Mr. Barber says nothing about conducting a separate analysis of the localized health impacts the project's emissions may have.

The Court of Appeal's holding, which incorrectly extrapolates a request for an HRA for TACs into a new analysis of the localized health impacts of the project's criteria air pollutants, highlights two additional errors in the Court's decision.

First, the Court of Appeal's holding illustrates why the Court should have applied the deferential substantial evidence standard of review to the issue of whether the EIR's air quality analysis was sufficient. The regulation of air pollution is a technical and complex field and the Court of Appeal lacked the expertise to fully appreciate the difference between TACs and criteria air pollutants and tools available for analyzing each type of pollutant.

Second, it illustrates that the Court likely got it wrong when it held that the issue regarding the criteria pollutant / localized health impact analysis was properly exhausted during the administrative process. In order to preserve an issue for the court, '[t]he "exact issue" must have been presented to the administrative agency....' [Citation.] *Citizens for Responsible Equitable Environmental Development v. City of San Diego*, (2011) 196 Cal.App.4th 515, 527 129 Cal.Rptr.3d 512, 521; *Sierra Club v. City of Orange* (2008) 163 Cal.App.4th 523, 535, 78 Cal.Rptr.3d 1, 13. "[T]he objections must be sufficiently specific so that the agency has the

opportunity to evaluate and respond to them.’ [Citation.]” *Sierra Club v. City of Orange*, 163 Cal.App.4<sup>th</sup> at 536.<sup>19</sup>

As discussed above, the City’s comment, while specific enough to request a commonly performed HRA for TACs, provided the County with no notice that it should perform a new type of analysis correlating criteria pollutant tonnages to specific human health effects. Although the parties have not directly addressed the issue of failure to exhaust administrative remedies in their briefs, the Air District submits that the Court should consider how it affects the issues briefed by the parties since “[e]xhaustion of administrative remedies is a jurisdictional prerequisite to maintenance of a CEQA action.” *Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal.App.4<sup>th</sup> 1184, 1199, 22 Cal.Rptr.3d 203.

### III. CONCLUSION

For all of the foregoing reasons, the Air District respectfully requests that the portion of the Court of Appeal’s decision requiring an analysis correlating the localized human health impacts associated with an individual project’s criteria air pollutant emissions be reversed.

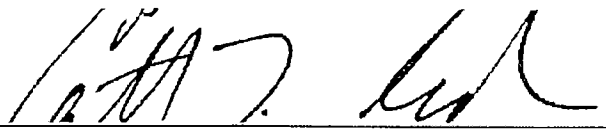
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<sup>19</sup> *Sierra Club v. City of Orange*, is illustrative here. In that case, the plaintiffs challenged an EIR approved for a large planned community on the basis that the EIR improperly broke up the various environmental impacts by separate project components or “piecemealed” the analysis in violation of CEQA. In evaluating the defense that the plaintiffs had failed to adequately raise the issue at the administrative level, the Court held that comments such as “*the use of a single document for both a project-level and a program-level EIR [is] ‘confusing’*,” and “[t]he lead agency should identify any potential adverse air quality impacts that could occur from all phases of the project and all air pollutant sources related to the project,” were too vague to fairly raise the argument of piecemealing before the agency. *Sierra Club v. City of Orange*, 163 Cal.App.4<sup>th</sup> at 537.

correlating the localized human health impacts associated with an individual project's criteria air pollutant emissions be reversed.

Respectfully submitted,

Dated: April 2, 2015



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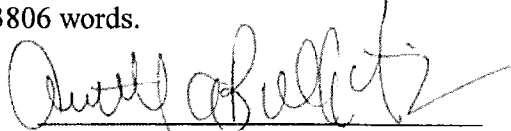
Catherine T. Redmond  
Attorney for Proposed Amicus  
Curiae

SAN JOAQUIN VALLEY  
UNIFIED  
AIR POLLUTION CONTROL  
DISTRICT

## CERTIFICATE OF WORD COUNT

Pursuant to Rule 8.204 of the California Rules of Court, I hereby certify that this document, based on the Word County feature of the Microsoft Word software program used to compose and print this document, contains, exclusive of caption, tables, certificate of word count, signature block and certificate of service, 3806 words.

Dated: April 2, 2015



Annette A. Ballatore-Williamson  
District Counsel (SBN 192176)



*Sierra Club et al, v. County of Fresno, et al*  
**Supreme Court of California Case No.: S219783**  
Fifth District Court of Appeal Case No.: F066798  
Fresno County Superior Court Case No.: 11CECG00726

**PROOF OF SERVICE**

I am over the age of 18 years and not a party to the above-captioned action; that my business address is San Joaquin Valley Unified Air Pollution Control District located at 1990 E. Gettysburg Avenue, Fresno, California 93726.

On April 2, 2015, I served the document described below:

**APPLICATION FOR LEAVE TO FILE AMICUS CURIAE BRIEF OF  
SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT IN  
SUPPORT OF DEFENDANT AND RESPONDENT, COUNTY OF FRESNO**

On all parties to this action at the following addresses and in the following manner:

**PLEASE SEE ATTACHED SERVICE LIST**

- (XX) **(BY MAIL)** I caused a true copy of each document(s) to be laced in a sealed envelope with first-class postage affixed and placed the envelope for collection. Mail is collected daily at my office and placed in a United State Postal Service collection box for pick-up and delivery that same day.
- ( ) **(BY ELECTRONIC MAIL)** I caused a true and correct scanned image (.PDF file) copy to be transmitted via electronic mail transfer system in place at the San Joaquin Valley Unified Air Pollution Control District ("District"), originating from the undersigned at 1990 E. Gettysburg Avenue, Fresno, CA, to the address(es) indicated below.
- ( ) **(BY OVERNIGHT MAIL)** I caused a true and correct copy to be delivered via Federal Express to the following person(s) or their representative at the address(es) listed below.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that I executed this document on April 2, 2015, at Fresno, California.

  
\_\_\_\_\_  
Esthela Soto

**SERVICE LIST**

***Sierra Club et al, v. County of Fresno, et al***

**Supreme Court of California Case No.: S219783**

**Fifth District Court of Appeal Case No.: F066798**

**Fresno County Superior Court Case No.: 11CECG00726**

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<p>Gene Talmadge, President  <b>CALIFORNIA ASSOCIATION OF ENVIRONMENTAL PROFESSIONALS</b>  40747 Baranda Court  Palm Desert, California 92260  Telephone: (760) 340-4499  Facsimile: (760) 674-2479</p>	<p>Attorney for Amicus Curiae, California Association of Environmental Professionals</p>
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SMAQMD

FRIANT RANCH

INTERIM RECOMMENDATION

## Background

The California Supreme Court in the case of *Sierra Club v. County of Fresno* (2018) 6 Cal. 5th 502 regarding the proposed Friant Ranch project determined the air quality analysis in the environmental impact report (EIR) was inadequate because it did not make “a reasonable effort to substantively connect the project’s air quality impacts to likely health consequences.” The Court determined that “the EIR should be revised to relate the expected adverse air quality impacts to likely health consequences or explain in meaningful detail why it is not feasible at the time of drafting to provide such an analysis.”

## Need

Lead agencies and practitioners preparing documents to comply with the California Environmental Quality Act (CEQA) have requested guidance from the Sacramento Metropolitan Air Quality Management District (Sac Metro Air District) on implementing the Friant Ranch decision in the review and analysis of proposed projects in Sacramento County.

## Interim Recommendation

The Sac Metro Air District does not currently have a methodology that would correlate the expected air quality emissions of projects to the likely health consequences of the increased emissions. The Sac Metro Air District is in the process of developing a methodology to assess these impacts, and anticipates releasing it in the fall of 2019. In the interim, agencies should follow the Friant Court’s advice to explain in meaningful detail why this analysis is not yet feasible.

This explanation should describe the background underlying air regulations, the regional nature of the regulatory approach, and why the approach is not amenable to project level assessments. This should include a discussion of the public health impact analyses that form the basis for the state and federal health-based pollutant concentration standards, and the application of the standards to regions that were established based upon a commonality of factors impacting air quality. Air districts, in turn, have focused on reducing regional emissions from all sectors to meet the health-based concentration standards, thereby reducing the pollutant specific health impacts for the entire population. For example, the Sac Metro Air District prepared plans to attain and maintain the ozone and particulate matter ambient air quality standards. These attainment plans include emissions inventories, air monitoring data, control measures, modeling, future pollutant-level estimates, and general health information. Attainment planning models rely on regional inputs to determine ozone and particulate matter formation and concentrations in a regional context, not a project specific context. Because of the complexity of ozone formation, the pounds or tons of emissions from a proposed project in a specific geographical location does not equate to a specific concentration of ozone formation in a given area, because in addition to emission levels, ozone formation is affected by atmospheric chemistry, geography, and weather. Secondary formation of particulate matter is very similar to the complexity of ozone formation, and localized impacts of directly emitted particulate matter do not always equate to local particulate matter concentrations due to transport of emissions. The analysis should explain that because air district attainment plans and supporting air model tools are regional in nature, they do not allow for analysis of the health impacts of specific projects on any given geographic location. More information is included in the threshold justification documents developed by the Sac Metro Air District, and available at our website at [www.airquality.org](http://www.airquality.org).

The analysis should also discuss the current models<sup>1</sup> used in CEQA in air quality analyses, which, in contrast to attainment models, are designed to calculate and disclose the mass emissions expected from the construction and operation of a proposed project (pounds/day and tons/year). The estimated emissions are then compared to significance thresholds, which are in turn keyed to reducing emissions to levels that will not interfere with the region’s ability to attain the health-based standards. The Sac Metro Air District adopted operational emission thresholds for ozone precursors, nitrogen oxides (NOx) and reactive organic gasses (ROG), with the goal of obtaining 0.45 tons/year of NOx and 0.49 tons/year of ROG reductions from new

development projects exceeding the thresholds by including emission reducing design features as mitigation.<sup>ii</sup> More recently, the Sac Metro Air District adopted particulate matter thresholds, PM10 and PM2.5, to align with the new source review permit offset levels, which are designed to prevent new emission sources from affecting attainment progress.<sup>iii</sup> Sac Metro Air District thresholds are set at 65 pounds/day NOx (11.8 tons/year), 65 pounds/day ROG (11.8 tons/year), 80 pounds/day PM10 (14.6 tons/year), and 82 pounds/day PM2.5 (15 tons/year).<sup>iv</sup> CEQA thresholds are a tool Sac Metro Air District uses to obtain emission reductions from development projects to support attainment of the Federal and State ambient air quality standards. This protects public health in the overall region, but there is currently no methodology to determine the impact of emissions on concentration levels in specific geographic areas.

The CEQA analysis should consider the degree to which various other tools, such as CalEEMod, EMFAC, OFFROAD, AERMOD, and HARP and CAMx, could assist in assessing specific health impacts of a project, and, where those tools would not be useful, explain why. For example, while CalEEMod may be useful in comparing emissions to significance thresholds, it is not able to assess transport of pollutants or the impacts of external factors (weather, terrain, etc.) on pollutant concentrations at particular locations.

In Sacramento, concentration modeling of ozone has not been an analytical tool used for project level emissions due to the complex nature of pollution concentration formation and numerous regional influences (multiple emission sources, meteorology, atmospheric chemistry and geography). Although some particulate matter concentration modeling has been conducted for project specific emissions for stationary source permitting purposes, concentration modeling has mainly been used to support ozone attainment demonstration.

Outside of these tools, neither the Sac Metro Air District nor any other air district currently have methodologies that would provide Lead Agencies and CEQA practitioners with a consistent, reliable, and meaningful analysis to correlate specific health impacts that may result from a proposed project's mass emissions.

An expanded discussion of health impacts resulting from specific air pollutants may also be warranted for projects with emissions exceeding the Sac Metro Air District's thresholds of significance. There is an array of information on health impacts related to exposure to ozone<sup>v</sup> and particulate matter<sup>vi</sup> emissions published by the US EPA and the California Air Resources Board. Health studies are used by these agencies to set the Federal and State ambient air quality standards. A more general discussion of health impacts related to air pollution is also available on [www.sparetheair.com](http://www.sparetheair.com) and in the Sac Metro Air District's *Guide to Air Quality Assessment in Sacramento County*.<sup>vii</sup> None of the health-related information can be directly correlated to the pounds/day or tons/year of emissions estimated from a single, proposed project.

## **Developing Guidance**

The interim recommendation is in place to assist lead agencies and practitioners with CEQA document preparation until Sac Metro Air District develops a methodology that provides a consistent, reliable and meaningful analysis to address the Court's direction on correlating health impacts to a project's emissions.

Sac Metro Air District staff have initiated discussions with the other air district's in the Sacramento Federal Ozone Nonattainment area regarding developing guidance in response to Friant Ranch since we share air quality issues and use the same growth assumptions, mobile source emissions, and modeling efforts to support our ozone and particulate matter attainment plans.

One potentially useful tool in developing a methodology is the US EPA's BenMap tool<sup>viii</sup>. According to US EPA's website, BenMap is an "open-source computer program that calculates the number and economic value of air pollution-related deaths and illnesses. The software incorporates a database that includes many of the concentration-response relationships, population files, and health and economic data needed to quantify these impacts." BenMap may be able to provide the detailed health information needed for the guidance under development.

Sac Metro Air District is working with its engineering and environmental technical support consultant, Ramboll USA Corporation, to develop a methodology that will provide a consistent, reliable, efficient, and meaningful analysis that correlates health impacts from proposed projects' emissions for the Sacramento region. The current strategy will analyze how various levels of emissions (the CEQA tonnage estimates) impact attainment pollutant concentration levels, and use BenMap to correlate increases in concentration levels to health impacts. Once a methodology is available, Sac Metro Air District staff will inform interested stakeholders and provide updated guidance in this document and in its *Guide to Air Quality Assessment in Sacramento County*.

## Contact Information

Lead agencies and CEQA practitioners may contact Mr. Paul Philley, CEQA and Land Use Section Program Supervisor at 916-874-4882 or [pphilley@airquality.org](mailto:pphilley@airquality.org) regarding Sac Metro Air District's recommendations.

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<sup>i</sup> CalEEMod, Road Construction Emissions Model, EMFAC, OFFROAD

<sup>ii</sup> Foundation for a Threshold, Justification for Air Quality Thresholds of Significance In the Sacramento Federal Nonattainment Area, August 15, 2001, Adopted March 28, 2002.

<sup>iii</sup> Proposed Particulate Matter CEQA Thresholds of Significance, March 19, 2015, Adopted May 28, 2015.

<sup>iv</sup> Sac Metro Air District, Guide to Air Quality Assessment in Sacramento County, December 2009 (latest update September 2018), Chapter 2, Thresholds of Significance table. <http://www.airquality.org/LandUseTransportation/Documents/CH2ThresholdsTable5-2015.pdf>

<sup>v</sup> <https://www.epa.gov/ozone-pollution-and-your-patients-health/health-effects-ozone-general-population>

<sup>vi</sup> <https://www.arb.ca.gov/research/health/pm-mort/PMmortalityreportFINALR10-24-08.pdf>

<sup>vii</sup> Sac Metro Air District, Guide to Air Quality Assessment in Sacramento County, December 2009 (latest update September 2018), Chapter 1. <http://www.airquality.org/LandUseTransportation/Documents/Ch1IntroAq%20FINAL12-2016.pdf>

<sup>viii</sup> <https://www.epa.gov/benmap>



# Appendix E

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CNDDDB Special-Status Species List

## Citywide Sensitive Species and Habitats

Scientific Name	Status	Habitat Requirements
Common Name		
<b>Plants and Lichens</b>		
<i>Abronia maritima</i> red sand-verbena	None/None G4/S3? 4.2	Perennial herb. Blooms Feb-Nov. Occurs in coastal dunes of central and southern California, as well as the Channel Islands. Formerly fairly widespread, but available habitat has decreased, especially in Southern California. Under 100m (330ft).
<i>Aphanisma blitoides</i> aphanisma	None/None G3G4/S2 1B.2	Coastal bluff scrub, coastal dunes, coastal scrub. On bluffs and slopes near the ocean in sandy or clay soils. 3-305 m. - m. Blooms
<i>Arctostaphylos gabilanensis</i> Gabilan Mountains manzanita	None/None G1/S1 1B.2	Chaparral, cismontane woodland. Granitic substrates. 425-670 m. - m. Blooms
<i>Arctostaphylos glandulosa</i> ssp. <i>gabrielensis</i> San Gabriel manzanita	None/None G5T3/S3 1B.2 USFS S	Chaparral. Rocky outcrops, can be dominant shrub where it occurs. 960-2015 m. - m. Blooms
<i>Arenaria paludicola</i> marsh sandwort	FE/SE G1/S1 1B.1	Occurs in sandy substrates and openings within freshwater or brackish marshes and swamps. This species blooms between May and August, and typically occurs at elevations ranging from 3-170 meters.
<i>Asplenium vespertinum</i> western spleenwort	None/None G4/S4 4.2	Chaparral, cismontane woodland, coastal scrub. Rocky sites. 180-1000 m. - m. Blooms
<i>Astragalus brauntonii</i> Braunton's milk-vetch	FE/None G2/S2 1B.1	Perennial herb. Blooms January to August. Closed-cone coniferous forest, chaparral, coast scrub, valley and foothill grassland. Recent burns or disturbed areas; in saline, somewhat alkaline soils high in Ca, Mg, with some K. Soil specialist; requires shallow soils to defeat pocket gophers and open areas, preferably on hilltops, saddles or bowls between hills. 200-650m (655-2130ft).
<i>Astragalus hornii</i> var. <i>hornii</i> Horn's milk-vetch	None/None GUT1/S1 1B.1 BLM S	Meadows and seeps, playas. Lake margins, alkaline sites. 75-350 m. - m. Blooms
<i>Astragalus pycnostachyus</i> var. <i>lanosissimus</i> Ventura Marsh milk-vetch	FE/SE G2T1/S1 1B.1	Marshes and swamps, coastal dunes, coastal scrub. Within reach of high tide or protected by barrier beaches, more rarely near seeps on sandy bluffs. 1-60 m. - m. Blooms

Scientific Name Common Name	Status	Habitat Requirements
<i>Astragalus tener</i> var. <i>titi</i> coastal dunes milk-vetch	FE/SE G2T1/S1 1B.1	Coastal bluff scrub, coastal dunes, coastal prairie. Moist, sandy depressions of bluffs or dunes along and near the Pacific Ocean; one site on a clay terrace. 1-45 m. - m. Blooms
<i>Atriplex coulteri</i> Coulter's saltbush	None/None G3/S1S2 1B.2	Coastal bluff scrub, coastal dunes, coastal scrub, valley and foothill grassland. Ocean bluffs, ridgetops, as well as alkaline low places. Alkaline or clay soils. 2-460 m. - m. Blooms
<i>Atriplex pacifica</i> south coast saltscale	None/None G4/S2 1B.2	Coastal scrub, coastal bluff scrub, playas, coastal dunes. Alkali soils. 1-400 m. - m. Blooms
<i>Atriplex parishii</i> Parish's brittlescale	None/None G1G2/S1 1B.1 USFS S	Vernal pools, chenopod scrub, playas. Usually on drying alkali flats with fine soils. 4-1420 m. - m. Blooms
<i>Atriplex serenana</i> var. <i>davidsonii</i> Davidson's saltscale	None/None G5T1/S1 1B.2	Annual herb. Blooms April to October. Coastal bluff scrub, coastal scrub. Alkaline soil. 3-250m (10-820ft).
<i>Berberis nevini</i> Nevin's barberry	FE/SE G1/S1 1B.1	Chaparral, cismontane woodland, coastal scrub, riparian scrub. On steep, N-facing slopes or in low grade sandy washes. 90-1590 m. - m. Blooms
<i>Calandrinia breweri</i> Brewer's calandrinia	None/None G4/S4 4.2	Chaparral, coastal scrub. Sandy or loamy soils. Disturbed sites, burns. 10-1200 m. - m. Blooms
<i>Calochortus catalinae</i> Catalina mariposa-lily	None/None G3G4/S3S4 4.2	Valley and foothill grassland, chaparral, coastal scrub, cismontane woodland. In heavy soils, open slopes, openings in brush. 15-700 m. - m. Blooms
<i>Calochortus clavatus</i> var. <i>gracilis</i> slender mariposa-lily	None/None G4T2T3/S2S3 1B.2 USFS S	Perennial bulbiferous herb. Blooms March to June. Chaparral, coastal scrub. Shaded foothill canyons, often on grassy slopes within other habitat. 420-760m (1380-2495ft).
<i>Calochortus palmeri</i> var. <i>palmeri</i> Palmer's mariposa-lily	None/None G3T2/S2 1B.2 BLM S USFS S	Meadows and seeps, chaparral, lower montane coniferous forest. Vernal moist places in yellow-pine forest, chaparral. 195-2530 m. - m. Blooms
<i>Calochortus plummerae</i> Plummer's mariposa-lily	None/None G4/S4 4.2	Coastal scrub, chaparral, valley and foothill grassland, cismontane woodland, lower montane coniferous forest. Occurs on rocky and sandy sites, usually of granitic or alluvial material. Can be very common after fire. 60-2500 m. - m. Blooms

Scientific Name Common Name	Status	Habitat Requirements
<i>Calystegia felix</i> lucky morning-glory	None/None G1Q/S1 1B.1	Meadows and seeps, riparian scrub. Sometimes alkaline, alluvial. 9-205 m. - m. Blooms
<i>Calystegia peirsonii</i> Peirson's morning-glory	None/None G4/S4 4.2	Chaparral, coastal scrub, chenopod scrub, cismontane woodland, lower montane coniferous forest, valley and foothill grassland. Often in disturbed areas or along roadsides or in grassy, open areas. 30-1500 m. - m. Blooms
<i>Camissoniopsis lewisii</i> Lewis' evening-primrose	None/None G4/S4 3	Valley and foothill grassland, coastal bluff scrub, cismontane woodland, coastal dunes, coastal scrub. Sandy or clay soil. 0-300 m. - m. Blooms
<i>Canbya candida</i> white pygmy-poppy	None/None G3G4/S3S4 4.2 USFS S	Joshua tree woodland, Mojavean desert scrub, pinyon and juniper woodland. Gravelly, sandy, granitic places. 600-1460 m. - m. Blooms
<i>Castilleja gleasonii</i> Mt. Gleason paintbrush	None/SR G2/S2 1B.2 USFS S	Lower montane coniferous forest, chaparral, pinyon and juniper woodland. On open flats or slopes in granitic soil. Restricted to the San Gabriel Mountains. 975-1950 m. - m. Blooms
<i>Centromadia parryi</i> ssp. <i>australis</i> southern tarplant	None/None G3T2/S2 1B.1	Marshes and swamps (margins), valley and foothill grassland, vernal pools. Often in disturbed sites near the coast at marsh edges, also in alkaline soils sometimes with saltgrass. Sometimes on vernal pool margins. 0-975 m. - m. Blooms
<i>Centromadia pungens</i> ssp. <i>laevis</i> smooth tarplant	None/None G3G4T2/S2 1B.1	Valley and foothill grassland, chenopod scrub, meadows and seeps, playas, riparian woodland. Alkali meadow, alkali scrub, also in disturbed places. 5-1170 m. - m. Blooms
<i>Cercocarpus betuloides</i> var. <i>blancheae</i> island mountain-mahogany	None/None G5T4/S4 4.3	Chaparral, closed-cone coniferous forest. 30-600 m. - m. Blooms
<i>Chaenactis glabriuscula</i> var. <i>orcuttiana</i> Orcutt's pincushion	None/None G5T1T2/S1 1B.1	Coastal bluff scrub, coastal dunes. Sandy sites. 3-80 m. - m. Blooms
<i>Chenopodium littoreum</i> coastal goosefoot	None/None G1/S1 1B.2	Occurs in coastal dunes. Species blooms between April and August, and typically occurs at elevations ranging from 10-30 meters.
<i>Chloropyron maritimum</i> ssp. <i>maritimum</i> salt marsh bird's-beak	FE/SE G4?T1/S1 1B.2 BLM S	Occurs in coastal dunes and coastal salt marshes and swamps. This species blooms between May and October, and typically occurs at elevations ranging from 0-30 meters.

Scientific Name Common Name	Status	Habitat Requirements
<i>Chorizanthe parryi</i> var. <i>fernandina</i> San Fernando Valley spineflower	None/SE G2T1/S1 1B.1 USFS S	Annual herb. Blooms April to July. Found in washes and sandy areas (alluvial scrub), in the hills and on mesas. Poorly developed soils, mostly in loam or silty clay loam. 3-1035m (10-3395ft).
<i>Chorizanthe parryi</i> var. <i>parryi</i> Parry's spineflower	None/None G3T2/S2 1B.1 BLM S USFS S	Coastal scrub, chaparral, cismontane woodland, valley and foothill grassland. Dry slopes and flats; sometimes at interface of 2 vegetation types, such as chaparral and oak woodland. Dry, sandy soils. 90-1220 m. - m. Blooms
<i>Cistanthe maritima</i> seaside cistanthe	None/None G3G4/S3 4.2	Coastal bluff scrub, coastal scrub, valley and foothill grassland. Sea bluffs; sandy sites. 5-300 m. - m. Blooms
<i>Clinopodium mimuloides</i> monkey-flower savory	None/None G3/S3 4.2	North coast coniferous forest, chaparral. Streambanks, mesic sites. 305-1800 m. - m. Blooms
<i>Convolvulus simulans</i> small-flowered morning-glory	None/None G4/S4 4.2	Chaparral, coastal scrub, valley and foothill grassland. Wet clay, serpentine ridges. 30-700 m. - m. Blooms
<i>Crossosoma californicum</i> Catalina crossosoma	None/None G3/S3 1B.2	Chaparral, coastal scrub. On rocky sea bluffs, wooded canyons, and dry, open sunny spots on rocky clay. 5-535 m. - m. Blooms
<i>Deinandra minthornii</i> Santa Susana tarplant	None/SR G2/S2 1B.2	Perennial deciduous shrub. Blooms July to November. Chaparral, coastal scrub. On sandstone outcrops and crevices, in shrubland. 280-760m (1920-2495ft).
<i>Deinandra paniculata</i> paniculate tarplant	None/None G4/S4 4.2	Coastal scrub, valley and foothill grassland, vernal pools. Usually in vernal mesic sites. Sometimes in vernal pools or on mima mounds near them. 25-940 m. - m. Blooms
<i>Dichondra occidentalis</i> western dichondra	None/None G3G4/S3S4 4.2	Chaparral, cismontane woodland, coastal scrub, valley and foothill grassland. On sandy loam, clay, and rocky soils. 50-500 m. - m. Blooms
<i>Diplacus johnstonii</i> Johnston's monkeyflower	None/None G4/S4 4.3	Lower montane coniferous forest. On scree, in rocky, or gravelly sites, also in disturbed areas. 975-2920 m. - m. Blooms
<i>Dithyrea maritima</i> beach spectaclepod	None/ST G1/S1 1B.1	Occurs in coastal dunes and sandy substrates within coastal scrub sand dunes and other sandy soils near the seashore. This species blooms between March and May, and typically occurs at elevations ranging from 3-50 meters.

Scientific Name Common Name	Status	Habitat Requirements
<i>Dodecahema leptoceras</i> slender-horned spineflower	FE/SE G1/S1 1B.1	Chaparral, cismontane woodland, coastal scrub (alluvial fan sage scrub). Flood deposited terraces and washes; associates include <i>Encelia</i> , <i>Dalea</i> , <i>Lepidospartum</i> , etc. Sandy soils. 200-765 m. - m. Blooms
<i>Dudleya blochmaniae</i> ssp. <i>blochmaniae</i> Blochman's dudleya	None/None G3T2/S2 1B.1	Occurs in rocky, often clay or serpentinite substrates within coastal bluff scrub, chaparral, coastal scrub, and valley and foothill grassland. This species blooms between April and June, and typically occurs at elevations ranging from 5-450 meters.
<i>Dudleya cymosa</i> ssp. <i>ovatifolia</i> Santa Monica dudleya	FT/None G5T1/S1 1B.1	Perennial herb. Blooms March to June. Chaparral, coastal scrub. In canyons on sedimentary conglomerates; primarily north-facing slopes. 210-500m (690-1640ft).
<i>Dudleya densiflora</i> San Gabriel Mountains dudleya	None/None G2/S2 1B.1 USFS S	Chaparral, coastal scrub, cismontane woodland, lower montane coniferous forest, riparian forest. In crevices and on decomposed granite on cliffs and canyon walls. 270-1100 m. - m. Blooms
<i>Dudleya multicaulis</i> many-stemmed dudleya	None/None G2/S2 1B.2 USFS S	Chaparral, coastal scrub, valley and foothill grassland. In heavy, often clayey soils or grassy slopes. 1-910 m. - m. Blooms
<i>Dudleya parva</i> Conejo dudleya	FT/None G1/S1 1B.2	Coastal scrub, valley and foothill grassland. In clay or volcanic soils on rocky slopes and grassy hillsides. 90-380 m. - m. Blooms
<i>Dudleya virens</i> ssp. <i>insularis</i> island green dudleya	None/None G3T3/S3 1B.2	Coastal bluff scrub, coastal scrub. Rocky soils. 0-275 m. - m. Blooms
<i>Eryngium aristulatum</i> var. <i>parishii</i> San Diego button-celery	FE/SE G5T1/S1 1B.1	Vernal pools, coastal scrub, valley and foothill grassland. San Diego mesa hardpan & claypan vernal pools & southern interior basalt flow vernal pools; usually surrounded by scrub. 15-880 m. - m. Blooms
<i>Erysimum insulare</i> island wallflower	None/None G3/S3 1B.3	Coastal bluff scrub, coastal dunes, chaparral. Mesas and cliffs. 15-230 m. - m. Blooms
<i>Erysimum suffrutescens</i> suffrutescent wallflower	None/None G3/S3 4.2	Coastal dunes, coastal scrub, coastal bluff scrub, chaparral. Coastal dunes and bluffs. 0-150 m. - m. Blooms
<i>Galium angustifolium</i> ssp. <i>gracillimum</i> slender bedstraw	None/None G5T4/S4 4.2	Sonoran desert scrub, Joshua tree woodland. Shaded places among granite boulders in canyons, and on outcrops. 130-1550 m. - m. Blooms

Scientific Name Common Name	Status	Habitat Requirements
<i>Galium cliftonsmithii</i> Santa Barbara bedstraw	None/None G4/S4 4.3	Cismontane woodland, chaparral. Light shade, coastal canyons, dry banks. 200-1220 m. - m. Blooms
<i>Galium jepsonii</i> Jepson's bedstraw	None/None G3/S3 4.3	Upper montane coniferous forest, lower montane coniferous forest. On granite; gravelly hillsides and slopes. 1540-2500 m. - m. Blooms
<i>Galium johnstonii</i> Johnston's bedstraw	None/None G4/S4 4.3	Chaparral, lower montane coniferous forest, pinyon and juniper woodland, riparian woodland. Open, mixed forest. 1650-2300 m. - m. Blooms
<i>Harpagonella palmeri</i> Palmer's grapplinghook	None/None G4/S3 4.2	Chaparral, coastal scrub, valley and foothill grassland. Clay soils; open grassy areas within shrubland. 20-955 m. - m. Blooms
<i>Helianthus nuttallii</i> ssp. <i>parishii</i> Los Angeles sunflower	None/None G5TX/SX 1A	Marshes and swamps (coastal salt and freshwater). 35-1525 m. - m. Blooms
<i>Hordeum intercedens</i> vernal barley	None/None G3G4/S3S4 3.2	Valley and foothill grassland, vernal pools, coastal dunes, coastal scrub. Vernal pools, dry, saline streambeds, alkaline flats. 5-1000 m. - m. Blooms
<i>Horkelia cuneata</i> var. <i>puberula</i> mesa horkelia	None/None G4T1/S1 1B.1 USFS S	Perennial herb. Blooms February to September. Chaparral, cismontane woodland, coastal scrub. Sandy or gravelly sites. 70-810m (230-2655ft).
<i>Hulsea vestita</i> ssp. <i>gabrielensis</i> San Gabriel Mountains hulsea	None/None G5T3/S3 4.3 USFS S	Lower montane coniferous forest, upper montane coniferous forest. Rocky sites. 1500-2500 m. - m. Blooms
<i>Imperata brevifolia</i> California satintail	None/None G4/S3 2B.1 USFS S	Coastal scrub, chaparral, riparian scrub, Mojavean desert scrub, meadows and seeps (alkali), riparian scrub. Mesic sites, alkali seeps, riparian areas. 3-1495 m. - m. Blooms
<i>Isocoma menziesii</i> var. <i>decumbens</i> decumbent goldenbush	None/None G3G5T2T3/S2 1B.2 BLM S	Perennial shrub. Blooms April to November. Coastal scrub. Sandy soils; often in disturbed sites. 10-910m (30-2985ft).
<i>Juglans californica</i> southern California black walnut	None/None G4/S4 4.2	Chaparral, coastal scrub, cismontane woodland, riparian woodland. Slopes, canyons, alluvial habitats. 50-900 m. - m. Blooms
<i>Juncus acutus</i> ssp. <i>leopardii</i> southwestern spiny rush	None/None G5T5/S4 4.2	Salt marshes, alkaline seeps, coastal dunes (mesic sites). Moist saline places. 3-900 m. - m. Blooms

Scientific Name Common Name	Status	Habitat Requirements
<i>Lasthenia glabrata</i> ssp. <i>coulteri</i> Coulter's goldfields	None/None G4T2/S2 1B.1 BLM S	Annual herb. Blooms February to June. Coastal salt marshes, playas, valley and foothill grassland, vernal pools. Usually found on alkaline soils in playas, sinks, and grasslands. 1-1400m (3-4595ft).
<i>Lepechinia fragrans</i> fragrant pitcher sage	None/None G3/S3 4.2 USFS S	Chaparral. 20-1310 m. - m. Blooms
<i>Lepidium virginicum</i> var. <i>robinsonii</i> Robinson's pepper-grass	None/None G5T3/S3 4.3	Chaparral, coastal scrub. Dry soils, shrubland. 4-1435 m. - m. Blooms
<i>Lilium humboldtii</i> ssp. <i>ocellatum</i> ocellated humboldt lily	None/None G4T4?/S4? 4.2	Chaparral, coastal scrub, cismontane woodland, lower montane coniferous forest, riparian forest. Yellow-pine forest or openings, oak canyons. 30-1800 m. - m. Blooms
<i>Linanthus concinnus</i> San Gabriel linanthus	None/None G2/S2 1B.2 USFS S	Lower montane coniferous forest, upper montane coniferous forest, chaparral. Dry rocky slopes, often in Jeffrey pine/canyon oak forest. 1310-2560 m. - m. Blooms
<i>Lupinus paynei</i> Payne's bush lupine	None/None G1Q/S1 1B.1	Coastal scrub, riparian scrub, valley and foothill grassland. Sandy. 220-425 m. - m. Blooms
<i>Lycium brevipes</i> var. <i>hassei</i> Santa Catalina Island desert-thorn	None/None G5T1Q/S1 3.1	Coastal bluff scrub, coastal scrub. Coastal bluffs and slopes. 30-95 m. - m. Blooms
<i>Lycium californicum</i> California box-thorn	None/None G4/S4 4.2	Coastal bluff scrub, coastal scrub. 5-150 m. - m. Blooms
<i>Malacothamnus davidsonii</i> Davidson's bush-mallow	None/None G2/S2 1B.2	Coastal scrub, riparian woodland, chaparral, cismontane woodland. Sandy washes. 150-1525 m. - m. Blooms
<i>Monardella hypoleuca</i> ssp. <i>hypoleuca</i> white-veined monardella	None/None G4T3/S3 1B.3	Perennial herb. Blooms April to December. Chaparral, cismontane woodland. Dry slopes. 50-1525m (165-5005ft).
<i>Mucronea californica</i> California spineflower	None/None G3/S3 4.2	Chaparral, cismontane woodland, coastal dunes, coastal scrub, valley and foothill grassland. Sandy soil. 0-1400 m. - m. Blooms
<i>Muhlenbergia californica</i> California muhly	None/None G4/S4 4.3	Coastal scrub, chaparral, lower montane coniferous forest, meadows and seeps. Usually found near streams or seeps. 100-2000 m. - m. Blooms
<i>Nama stenocarpa</i> mud nama	None/None G4G5/S1S2 2B.2	Marshes and swamps. Lake shores, riverbanks, intermittently wet areas. 15-815 m. - m. Blooms



Scientific Name Common Name	Status	Habitat Requirements
<i>Nasturtium gambelii</i> Gambel's water cress	FE/ST G1/S1 1B.1	Marshes and swamps. Freshwater and brackish marshes at the margins of lakes and along streams, in or just above the water level. 5-305 m. - m. Blooms
<i>Navarretia fossalis</i> spreading navarretia	FT/None G2/S2 1B.1	Vernal pools, chenopod scrub, marshes and swamps, playas. San Diego hardpan and San Diego claypan vernal pools; in swales & vernal pools, often surrounded by other habitat types. 15-850 m. - m. Blooms
<i>Navarretia ojaiensis</i> Ojai navarretia	None/None G2/S2 1B.1 USFS S	Annual herb. Blooms May to July. Chaparral, coastal scrub, valley and foothill grassland. Openings in shrublands or grasslands. Typically occurs on clay soils. 275-620m (900-2035ft).
<i>Navarretia prostrata</i> prostrate vernal pool navarretia	None/None G2/S2 1B.2	Coastal scrub, valley and foothill grassland, vernal pools, meadows and seeps. Alkaline soils in grassland, or in vernal pools. Mesic, alkaline sites. 3-1235 m. - m. Blooms
<i>Nemacaulis denudata</i> var. <i>denudata</i> coast woolly-heads	None/None G3G4T2/S2 1B.2	Coastal dunes. 0-5 m. - m. Blooms
<i>Nolina cismontana</i> chaparral nolina	None/None G3/S3 1B.2 USFS S	Chaparral, coastal scrub. Primarily on sandstone and shale substrates; also known from gabbro. 140-1100 m. - m. Blooms
<i>Orcuttia californica</i> California Orcutt grass	FE/SE G1/S1 1B.1	Vernal pools. 10-660 m. - m. Blooms
<i>Orobanche valida</i> ssp. <i>valida</i> Rock Creek broomrape	None/None G4T2/S2 1B.2 USFS S	Chaparral, pinyon and juniper woodland. On slopes of loose decomposed granite; parasitic on various chaparral shrubs. 975-1985 m. - m. Blooms
<i>Pentachaeta lyonii</i> Lyon's pentachaeta	FE/SE G1/S1 1B.1	Annual herb. Blooms March to August. Chaparral, valley and foothill grassland, coastal scrub. Edges of clearing in chaparral, usually at the ecotone between grassland and chaparral or edges of firebreaks. 30-630m (100-2065ft).
<i>Phacelia hubbyi</i> Hubby's phacelia	None/None G4/S4 4.2	Chaparral, coastal scrub, valley and foothill grassland. Gravelly, rocky areas and talus slopes. 0-1000 m. - m. Blooms
<i>Phacelia ramosissima</i> var. <i>austrolitoralis</i> south coast branching phacelia	None/None G5?T3Q/S3 3.2	Chaparral, coastal scrub, coastal dunes, coastal salt marsh. Sandy, sometimes rocky sites. 5-300 m. - m. Blooms
<i>Phacelia stellaris</i> Brand's star phacelia	None/None G1/S1 1B.1	Coastal scrub, coastal dunes. Open areas. 3-370 m. - m. Blooms

Scientific Name Common Name	Status	Habitat Requirements
<i>Physalis lobata</i> lobed ground-cherry	None/None G5/S1S2 2B.3	Mojavean desert scrub, playas. Decomposed granite soil, alkaline dry lakes. 540-1310 m. - m. Blooms
<i>Potentilla multijuga</i> Ballona cinquefoil	None/None GX/SX 1A	Meadows and seeps. Brackish meadows. 0-2 m. - m. Blooms
<i>Pseudognaphalium leucocephalum</i> white rabbit-tobacco	None/None G4/S2 2B.2	Riparian woodland, cismontane woodland, coastal scrub, chaparral. Sandy, gravelly sites. 35-515 m. - m. Blooms
<i>Quercus dumosa</i> Nuttall's scrub oak	None/None G3/S3 1B.1 BLM S USFS S	Closed-cone coniferous forest, chaparral, coastal scrub. Generally, on sandy soils near the coast; sometimes on clay loam. 15-640 m. - m. Blooms
<i>Quercus durata</i> var. <i>gabrielensis</i> San Gabriel oak	None/None G4T3/S3 4.2	Chaparral, cismontane woodland. 450-1000 m. - m. Blooms
<i>Quercus engelmannii</i> Engelmann oak	None/None G3/S3 4.2	Cismontane woodland, chaparral, riparian woodland, valley and foothill grassland. 50-1300 m. - m. Blooms
<i>Ribes divaricatum</i> var. <i>parishii</i> Parish's gooseberry	None/None G5TX/SX 1A	Riparian woodland. Salix swales in riparian habitats. 65-300 m. - m. Blooms
<i>Romneya coulteri</i> Coulter's matilija poppy	None/None G4/S4 4.2	Coastal scrub, chaparral. In washes and on slopes, also after burns. 20-1200 m. - m. Blooms
<i>Rupertia rigida</i> Parish's rupertia	None/None G4/S4 4.3	Chaparral, lower montane coniferous forest, cismontane woodland, meadows and seeps, pebble plain, valley and foothill grassland. 700-2500 m. - m. Blooms
<i>Senecio astephanus</i> San Gabriel ragwort	None/None G3/S3 4.3	Chaparral, coastal bluff scrub. Rocky slopes. 400-1500 m. - m. Blooms
<i>Sidalcea neomexicana</i> salt spring checkerbloom	None/None G4/S2 2B.2 USFS S	Playas, chaparral, coastal scrub, lower montane coniferous forest, Mojavean desert scrub. Alkali springs and marshes. 3-2380 m. - m. Blooms
<i>Spermolepis lateriflora</i> western bristly scaleseed	None/None G5/SH 2A	Sonoran desert scrub. Rocky or sandy. 365-670 m. - m. Blooms
<i>Suaeda esteroa</i> estuary seablite	None/None G3/S2 1B.2	Marshes and swamps. Coastal salt marshes in clay, silt, and sand substrates. 0-80 m. - m. Blooms

Scientific Name Common Name	Status	Habitat Requirements
<i>Suaeda taxifolia</i> woolly seablite	None/None G4/S4 4.2	Coastal bluff scrub, coastal dunes, marshes and swamps. Margins of salt marshes. 0-50 m. - m. Blooms
<i>Symphotrichum defoliatum</i> San Bernardino aster	None/None G2/S2 1B.2 USFS S	Meadows and seeps, cismontane woodland, coastal scrub, lower montane coniferous forest, marshes and swamps, valley and foothill grassland. Vernal mesic grassland or near ditches, streams and springs; disturbed areas. 3-2045 m. - m. Blooms
<i>Symphotrichum greatae</i> Greata's aster	None/None G2/S2 1B.3	Chaparral, cismontane woodland, broadleaved upland forest, lower montane coniferous forest, riparian woodland. Mesic canyons. 335-2015 m. - m. Blooms
<i>Thelypteris puberula</i> var. <i>sonorensis</i> Sonoran maiden fern	None/None G5T3/S2 2B.2 USFS S	Meadows and seeps. Along streams, seepage areas. 60-930 m. - m. Blooms
<b>Invertebrates</b>		
<i>Aglaothorax longipennis</i> Santa Monica shieldback katydid	None/None G1G2/S1S2	Occur nocturnally in chaparral and canyon stream bottom vegetation, in the Santa Monica Mtns of Southern California. Inhabit introduced iceplant and native chaparral plants.
<i>Bombus crotchii</i> Crotch bumble bee	None/SCE G3G4/S1S2	Coastal California east to the Sierra-Cascade crest and south into Mexico. Food plant genera include <i>Antirrhinum</i> , <i>Phacelia</i> , <i>Clarkia</i> , <i>Dendromecon</i> , <i>Eschscholzia</i> , and <i>Eriogonum</i> .
<i>Brennania belkini</i> Belkin's dune tabanid fly	None/None G1G2/S1S2	Inhabits coastal sand dunes of Southern California.
<i>Cicindela hirticollis gravida</i> sandy beach tiger beetle	None/None G5T2/S2	Inhabits areas adjacent to non-brackish water along the coast of California from San Francisco Bay to northern Mexico. Clean, dry, light-colored sand in the upper zone. Subterranean larvae prefer moist sand not affected by wave action.
<i>Cicindela latesignata latesignata</i> western beach tiger beetle	None/None G2G4T1T2/S1	Mudflats and beaches in coastal Southern California.
<i>Cicindela senilis frosti</i> senile tiger beetle	None/None G2G3T1T3/S1	Inhabits marine shoreline, from Central California coast south to salt marshes of San Diego. Also found at Lake Elsinore. Inhabits dark-colored mud in the lower zone and dried salt pans in the upper zone.

Scientific Name Common Name	Status	Habitat Requirements
<i>Coelus globosus</i> globose dune beetle	None/None G1G2/S1S2	Inhabitant of coastal sand dune habitat; erratically distributed from Ten Mile Creek in Mendocino County south to Ensenada, Mexico. Inhabits foredunes and sand hummocks; it burrows beneath the sand surface and is most common beneath dune vegetation.
<i>Danaus plexippus pop. 1</i> monarch - California overwintering population	FC/None G4T2T3/S2S3 USFS S	Winter roost sites extend along the coast from northern Mendocino to Baja California, Mexico. Roosts located in wind-protected tree groves (eucalyptus, Monterey pine, cypress), with nectar and water sources nearby.
<i>Eucosma hennei</i> Henne's eucosman moth	None/None G1/S1	Endemic to the El Segundo Dunes (type locality), Los Angeles County. Larval foodplant is <i>Phacelia ramosissima</i> var. <i>austrolitoralis</i> ; larvae can be found on woody stems and upper root parts.
<i>Eugnosta busckana</i> Busck's gallmoth	None/None G1G3/SH	
<i>Euphilotes battoides allyni</i> El Segundo blue butterfly	FE/None G5T1/S1	Restricted to remnant coastal dune habitat in Southern California. Host plant is <i>Eriogonum parvifolium</i> ; larvae feed only on the flowers and seeds; used by adults as major nectar source.
<i>Glaucopsyche lygdamus palosverdesensis</i> Palos Verdes blue butterfly	FE/None G5T1/S1	Restricted to the cool, fog-shrouded, seaward side of Palos Verdes Hills, Los Angeles County. Host plant is <i>Astragalus trichopodus</i> var. <i>lonchus</i> (locoweed).
<i>Glyptostoma gabrielense</i> San Gabriel chestnut	None/None G2/S2	Terrestrial.
<i>Gonidea angulata</i> western ridged mussel	None/None G3/S1S2	Primarily creeks & rivers & less often lakes. Originally in most of state, now extirpated from Central & Southern Calif.
<i>Habroscelimorpha gabbii</i> western tidal-flat tiger beetle	None/None G2G4/S1	Inhabits estuaries and mudflats along the coast of Southern California. Generally found on dark-colored mud in the lower zone; occasionally found on dry saline flats of estuaries.
<i>Onychobaris langei</i> Lange's El Segundo Dune weevil	None/None G1/S1	Known from El Segundo Dunes.
<i>Panoquina errans</i> wandering (=saltmarsh) skipper	None/None G4G5/S2	Southern California coastal salt marshes. Requires moist saltgrass for larval development.
<i>Socalchemmis gertschi</i> Gertsch's socialchemmis spider	None/None G1/S1	Known from only 2 localities in Los Angeles County: Brentwood (type locality) and Topanga Canyon.

Scientific Name Common Name	Status	Habitat Requirements
<i>Streptocephalus woottoni</i> Riverside fairy shrimp	FE/None G1G2/S1S2	Endemic to Western Riverside, Orange, and San Diego counties in areas of tectonic swales/earth slump basins in grassland and coastal sage scrub. Inhabit seasonally astatic pools filled by winter/spring rains. Hatch in warm water later in the season.
<i>Trigonoscuta dorothea dorothea</i> Dorothy's El Segundo Dune weevil	None/None G1T1/S1	Coastal sand dunes in Los Angeles County.
<i>Tryonia imitator</i> mimic tryonia (=California brackishwater snail)	None/None G2/S2	Inhabits coastal lagoons, estuaries and salt marshes, from Sonoma County south to San Diego County. Found only in permanently submerged areas in a variety of sediment types; able to withstand a wide range of salinities.
<b>Fish</b>		
<i>Catostomus santaanae</i> Santa Ana sucker	FT/None G1/S1	Endemic to Los Angeles Basin south coastal streams. Habitat generalists, but prefer sand-rubble-boulder bottoms, cool, clear water, and algae.
<i>Gila orcuttii</i> arroyo chub	None/None G2/S2 SSC USFS S	Native to streams from Malibu Creek to San Luis Rey River basin. Introduced into streams in Santa Clara, Ventura, Santa Ynez, Mojave & San Diego river basins. Slow water stream sections with mud or sand bottoms. Feeds heavily on aquatic vegetation and associated invertebrates.
<i>Oncorhynchus mykiss irideus pop. 10</i> steelhead - southern California DPS	FE/None G5T1Q/S1	Federal listing refers to populations from Santa Maria River south to southern extent of range (San Mateo Creek in San Diego County). Southern steelhead likely have greater physiological tolerances to warmer water and more variable conditions.
<i>Rhinichthys osculus ssp. 3</i> Santa Ana speckled dace	None/None G5T1/S1 SSC USFS S	Headwaters of the Santa Ana and San Gabriel rivers. May be extirpated from the Los Angeles River system. Requires permanent flowing streams with summer water temps of 17-20 C. Usually inhabits shallow cobble and gravel riffles.
<i>Siphateles bicolor mohavensis</i> Mohave tui chub	FE/SE G4T1/S1 FP	Endemic to the Mojave River basin, adapted to alkaline, mineralized waters. Needs deep pools, ponds, or slough-like areas. Needs vegetation for spawning.

Scientific Name Common Name	Status	Habitat Requirements
<b>Amphibians</b>		
<i>Anaxyrus californicus</i> arroyo toad	FE/None G2G3/S2S3 SSC	Semi-arid regions near washes or intermittent streams, including valley-foothill and desert riparian, desert wash, etc. Rivers with sandy banks, willows, cottonwoods, and sycamores; loose, gravelly areas of streams in drier parts of range.
<i>Rana draytonii</i> California red-legged frog	FT/None G2G3/S2S3 SSC	Lowlands and foothills in or near permanent sources of deep water with dense, shrubby or emergent riparian vegetation. Requires 11-20 weeks of permanent water for larval development. Must have access to estivation habitat.
<i>Rana muscosa</i> southern mountain yellow-legged frog	FE/SE G1/S1 WL USFS S	Federal listing refers to populations in the San Gabriel, San Jacinto and San Bernardino mountains (southern DPS). Northern DPS was determined to warrant listing as endangered, Apr 2014, effective Jun 30, 2014. Always encountered within a few feet of water. Tadpoles may require 2 - 4 years to complete their aquatic development.
<i>Spea hammondi</i> western spadefoot	None/None G2G3/S3 SSC BLM S	Occurs primarily in grassland habitats but can be found in valley-foothill hardwood woodlands. Vernal pools are essential for breeding and egg-laying.
<i>Taricha torosa</i> Coast Range newt	None/None G4/S4 SSC	Coastal drainages from Mendocino County to San Diego County. Lives in terrestrial habitats & will migrate over 1 km to breed in ponds, reservoirs & slow-moving streams.
<b>Reptiles</b>		
<i>Anniella spp.</i> California legless lizard	None/None G3G4/S3S4 SSC	Contra Costa County south to San Diego, within a variety of open habitats. This element represents California records of <i>Anniella</i> not yet assigned to new species within the <i>Anniella pulchra</i> complex. Variety of habitats; generally, in moist, loose soil. They prefer soils with a high moisture content.
<i>Anniella stebbinsi</i> Southern California legless lizard	None/None G3/S3 SSC USFS S	Generally south of the Transverse Range, extending to northwestern Baja California. Occurs in sandy or loose loamy soils under sparse vegetation. Disjunct populations in the Tehachapi and Piute Mountains in Kern County. Variety of habitats; generally, in moist, loose soil. They prefer soils with a high moisture content.

Scientific Name Common Name	Status	Habitat Requirements
<i>Arizona elegans occidentalis</i> California glossy snake	None/None G5T2/S2 SSC	Patchily distributed from the eastern portion of San Francisco Bay, southern San Joaquin Valley, and the Coast, Transverse, and Peninsular ranges, south to Baja California. Generalist reported from a range of scrub and grassland habitats, often with loose or sandy soils.
<i>Aspidoscelis tigris stejnegeri</i> coastal whiptail	None/None G5T5/S3 SSC	Found in deserts and semi-arid areas with sparse vegetation and open areas. Also found in woodland & riparian areas. Ground may be firm soil, sandy, or rocky.
<i>Diadophis punctatus modestus</i> San Bernardino ringneck snake	None/None G5T2T3/S2? USFS S	Most common in open, relatively rocky areas. Often in somewhat moist microhabitats near intermittent streams. Avoids moving through open or barren areas by restricting movements to areas of surface litter or herbaceous veg.
<i>Emys marmorata</i> western pond turtle	None/None G3G4/S3 SSC BLM S USFS S	A thoroughly aquatic turtle of ponds, marshes, rivers, streams and irrigation ditches, usually with aquatic vegetation, below 6000 ft elevation. Needs basking sites and suitable (sandy banks or grassy open fields) upland habitat up to 0.5 km from water for egg-laying.
<i>Phrynosoma blainvillii</i> coast horned lizard	None/None G3G4/S3S4 SSC BLM S	Frequents a wide variety of habitats, most common in lowlands along sandy washes with scattered low bushes. Open areas for sunning, bushes for cover, patches of loose soil for burial, and abundant supply of ants and other insects.
<i>Thamnophis hammondi</i> two-striped gartersnake	None/None G4/S3S4 SSC BLM S USFS S	Coastal California from vicinity of Salinas to northwest Baja California. From sea to about 7,000 ft elevation. Highly aquatic, found in or near permanent fresh water. Often along streams with rocky beds and riparian growth.
<b>Birds</b>		
<i>Agelaius tricolor</i> tricolored blackbird	None/ST G1G2/S1S2 SSC BLM S USFWS BCC	Historically nested in wetlands with cattails, bulrushes, and willows; now nesting in agricultural fields. Continue to use wetlands for nesting and foraging where available. Found nesting in patches of Himalayan blackberry near stock ponds or irrigated pastures in the foothills of the Sierra Nevada, California. Foraging habitats include cultivated fields, feedlots associated with dairy farms, and wetlands.

Scientific Name Common Name	Status	Habitat Requirements
<i>Aimophila ruficeps canescens</i> southern California rufous-crowned sparrow	None/None G5T3/S3 WL	Resident in Southern California coastal sage scrub and sparse mixed chaparral. Frequents relatively steep, often rocky hillsides with grass and forb patches.
<i>Aquila chrysaetos</i> golden eagle	None/None G5/S3 FP WL BLM S USFWS BCC	Rolling foothills, mountain areas, sage-juniper flats, and desert. Cliff-walled canyons provide nesting habitat in most parts of range; also, large trees in open areas.
<i>Artemisiospiza belli belli</i> Bell's sage sparrow	None/None G5T2T3/S3 WL USFWS BCC	Nests in chaparral dominated by fairly dense stands of chamise. Found in coastal sage scrub in south of range. Nest located on the ground beneath a shrub or in a shrub 6-18 inches above ground. Territories about 50 yds apart.
<i>Athene cunicularia</i> burrowing owl	None/None G4/S3 SSC BLM S USFWS BCC	Open, dry annual or perennial grasslands, deserts, and scrublands characterized by low-growing vegetation. Subterranean nester, dependent upon burrowing mammals, most notably, the California ground squirrel.
<i>Buteo swainsoni</i> Swainson's hawk	None/ST G5/S3 BLM S USFWS BCC	Favor open habitats for foraging for prey; typically, in hay and alfalfa fields, pastures, grain crops, and row crops, or perched atop adjacent fence posts and overhead sprinkler systems. They rely on scattered stands of trees near agricultural fields and grasslands for nesting sites.
<i>Charadrius nivosus nivosus</i> western snowy plover	FT/None G3T3/S2 SSC USFWS BCC	Sandy beaches, salt pond levees & shores of large alkali lakes. Needs sandy, gravelly or friable soils for nesting.
<i>Coccyzus americanus occidentalis</i> western yellow-billed cuckoo	FT/SE G5T2T3/S1 BLM S USFS S USFWS BCC	Riparian forest nester, along the broad, lower flood-bottoms of larger river systems. Nests in riparian jungles of willow, often mixed with cottonwoods, with lower story of blackberry, nettles, or wild grape.
<i>Coturnicops noveboracensis</i> yellow rail	None/None G4/S1S2 SSC USFS S USFWS BCC	Summer resident in eastern Sierra Nevada in Mono County. Freshwater marshlands.
<i>Elanus leucurus</i> white-tailed kite	None/None G5/S3S4 FP BLM S	Rolling foothills and valley margins with scattered oaks & river bottomlands or marshes next to deciduous woodland. Open grasslands, meadows, or marshes for foraging close to isolated, dense-topped trees for nesting and perching.



Scientific Name Common Name	Status	Habitat Requirements
<i>Empidonax traillii extimus</i> southwestern willow flycatcher	FE/SE G5T2/S1	Riparian woodlands in Southern California.
<i>Falco peregrinus anatum</i> American peregrine falcon	FD/SD G4T4/S3S4 FP USFWS BCC	Near wetlands, lakes, rivers, or other water; on cliffs, banks, dunes, mounds; also, human-made structures. Nest consists of a scrape or a depression or ledge in an open site.
<i>Laterallus jamaicensis coturniculus</i> California black rail	None/ST G3G4T1/S1 FP BLM S USFWS BCC	Inhabits freshwater marshes, wet meadows and shallow margins of saltwater marshes bordering larger bays. Needs water depths of about 1 inch that do not fluctuate during the year and dense vegetation for nesting habitat.
<i>Passerculus sandwichensis beldingi</i> Belding's savannah sparrow	None/SE G5T3/S3	Inhabits coastal salt marshes, from Santa Barbara south through San Diego County. Nests in Salicornia on and about margins of tidal flats.
<i>Pelecanus occidentalis californicus</i> California brown pelican	FD/SD G4T3T4/S3 FP BLM S USFS S	Colonial nester on coastal islands just outside the surf line. Nests on coastal islands of small to moderate size which afford immunity from attack by ground-dwelling predators. Roosts communally.
<i>Polioptila californica californica</i> coastal California gnatcatcher	FT/None G4G5T3Q/S2 SSC	Obligate, permanent resident of coastal sage scrub below 2500 ft in Southern California. Low, coastal sage scrub in arid washes, on mesas and slopes. Not all areas classified as coastal sage scrub are occupied.
<i>Riparia riparia</i> bank swallow	None/ST G5/S2 BLM S	Colonial nester; nests primarily in riparian and other lowland habitats west of the desert. Requires vertical banks/cliffs with fine-textured/sandy soils near streams, rivers, lakes, ocean to dig nesting hole.
<i>Setophaga petechia</i> yellow warbler	None/None G5/S3S4 SSC USFWS BCC	Riparian plant associations in close proximity to water. Also nests in montane shrubbery in open conifer forests in Cascades and Sierra Nevada. Frequently found nesting and foraging in willow shrubs and thickets, and in other riparian plants including cottonwoods, sycamores, ash, and alders.
<i>Sternula antillarum browni</i> California least tern	FE/SE G4T2T3Q/S2 FP	Nests along the coast from San Francisco Bay south to northern Baja California. Colonial breeder on bare or sparsely vegetated, flat substrates: sand beaches, alkali flats, landfills, or paved areas.

Scientific Name Common Name	Status	Habitat Requirements
<i>Vireo bellii pusillus</i> least Bell's vireo	FE/SE G5T2/S2	Summer resident of Southern California in low riparian in vicinity of water or in dry river bottoms; below 2000 ft. Nests placed along margins of bushes or on twigs projecting into pathways, usually willow, Baccharis, mesquite.
<b>Mammals</b>		
<i>Antrozous pallidus</i> pallid bat	None/None G4/S3 SSC BLM S USFS S WBWG H	Found in a variety of habitats including deserts, grasslands, shrublands, woodlands, and forests. Most common in open, dry habitats with rocky areas for roosting. Roosts in crevices of rock outcrops, caves, mine tunnels, buildings, bridges, and hollows of live and dead trees which must protect bats from high temperatures. Very sensitive to disturbance of roosting sites.
<i>Corynorhinus townsendii</i> Townsend's big-eared bat	None/None G4/S2 SSC BLM S USFS S WBWG H	Occurs throughout California in a wide variety of habitats. Most common in mesic sites, typically coniferous or deciduous forests. Roosts in the open, hanging from walls & ceilings in caves, lava tubes, bridges, and buildings. This species is extremely sensitive to human disturbance.
<i>Eumops perotis californicus</i> western mastiff bat	None/None G4G5T4/S3S4 SSC BLM S WBWG H	Occurs in open, semi-arid to arid habitats, including coniferiferous and deciduous woodlands, coastal scrub, grasslands, and chaparral. Roosts in crevices in cliff faces and caves, and buildings. Roosts typically occur high above ground.
<i>Lasionycteris noctivagans</i> silver-haired bat	None/None G3G4/S3S4 WBWG M	Primarily a coastal and montane forest dweller, feeding over streams, ponds & open brushy areas. Roosts in hollow trees, beneath exfoliating bark, abandoned woodpecker holes, and rarely under rocks. Needs drinking water.
<i>Lasiurus cinereus</i> hoary bat	None/None G3G4/S4 WBWG M	Typically roosts in trees in deciduous and coniferous forests and woodlands but occasionally roosts in rocks crevices. Forages in open areas, typically along riparian corridors or over water. Diet primarily consists of moths.
<i>Lasiurus xanthinus</i> western yellow bat	None/None G4G5/S3 SSC WBWG H	Occurs in arid regions of the southwestern United States. Typically found in riparian woodlands, oak or pinyon-juniper woodland, desert wash, palm oasis habitats, and urban or suburban areas. Roosts in trees, often between palm fronds.

Scientific Name Common Name	Status	Habitat Requirements
<i>Lepus californicus bennettii</i> San Diego black-tailed jackrabbit	None/None G5T3T4/S3S4 SSC	Occurs in Los Angeles, San Bernardino, Riverside, and San Diego Counties of southern California. Typically found in open shrub habitats. Will also occur in woodland habitats with open understory adjacent to shrublands.
<i>Macrotus californicus</i> California leaf-nosed bat	None/None G3G4/S3 SSC BLM S WBWG H	Occurs in desert riparian, desert wash, desert scrub, desert succulent scrub, alkali scrub and palm oasis habitats. Needs rocky, rugged terrain with abandoned mines or caves for roosting.
<i>Microtus californicus stephensi</i> south coast marsh vole	None/None G5T2T3/S1S2 SSC	Occurs in tidal marshes of Orange, Los Angeles, and Ventura Counties.
<i>Neotoma lepida intermedia</i> San Diego desert woodrat	None/None G5T3T4/S3S4 SSC	Occurs in scrub habitats of southern California from San Luis Obispo County to San Diego County.
<i>Nyctinomops femorosaccus</i> pocketed free-tailed bat	None/None G5/S3 SSC WBWG M	Variety of arid areas in Southern California; pine-juniper woodlands, desert scrub, palm oasis, desert wash, desert riparian, etc. Rocky areas with high cliffs.
<i>Nyctinomops macrotis</i> big free-tailed bat	None/None G5/S3 SSC WBWG MH	Low-lying arid areas in Southern California. Need high cliffs or rocky outcrops for roosting sites. Feeds principally on large moths.
<i>Onychomys torridus ramona</i> southern grasshopper mouse	None/None G5T3/S3 SSC	Desert areas, especially scrub habitats with friable soils for digging. Prefers low to moderate shrub cover. Feeds almost exclusively on arthropods, especially scorpions and orthopteran insects.
<i>Perognathus longimembris brevinasus</i> Los Angeles pocket mouse	None/None G5T2/S1S2 SSC	Lower elevation grasslands and coastal sage communities in and around the Los Angeles Basin. Open ground with fine, sandy soils. May not dig extensive burrows, hiding under weeds and dead leaves instead.
<i>Perognathus longimembris pacificus</i> Pacific pocket mouse	FE/None G5T1/S1 SSC	Inhabits the narrow coastal plains from the Mexican border north to El Segundo, Los Angeles County. Seems to prefer soils of fine alluvial sands near the ocean, but much remains to be learned.
<i>Sorex ornatus salicornicus</i> southern California saltmarsh shrew	None/None G5T1?/S1 SSC	Coastal marshes in Los Angeles, Orange and Ventura counties. Requires dense vegetation and woody debris for cover.

Scientific Name Common Name	Status	Habitat Requirements
<i>Taxidea taxus</i> American badger	None/None G5/S3 SSC	Most abundant in drier open stages of most shrub, forest, and herbaceous habitats, with friable soils. Needs sufficient food, friable soils and open, uncultivated ground. Preys on burrowing rodents. Digs burrows.
<b>Sensitive Natural Communities</b>		
California Walnut Woodland	None/None G2/S2.1	
Riversidian Alluvial Fan Sage Scrub	None/None G1/S1.1	
Southern California Arroyo Chub/Santa Ana Sucker Stream	None/None GNR/SNR	
Southern Coast Live Oak Riparian Forest	None/None G4/S4	
Southern Coastal Bluff Scrub	None/None G1/S1.1	
Southern Coastal Salt Marsh	None/None G2/S2.1	
Southern Cottonwood Willow Riparian Forest	None/None G3/S3.2	
Southern Dune Scrub	None/None G1/S1.1	
Southern Mixed Riparian Forest	None/None G2/S2.1	
Southern Riparian Scrub	None/None G3/S3.2	
Southern Sycamore Alder Riparian Woodland	None/None G4/S4	
Southern Willow Scrub	None/None G3/S2.1	
Valley Needlegrass Grassland	None/None G3/S3.1	
Valley Oak Woodland	None/None G3/S2.1	
Walnut Forest	None/None G1/S1.1	

## Notes:

United States legal status under the Federal Endangered Species Act.

FT – Federally Threatened; FE – Federally Endangered; FD – Federally Delisted

State of California legal status.

ST – State Threatened; SE – State Endangered; SCE – State Candidate Endangered; SD – State Delisted

California Department of Fish and Wildlife designation and applies to animals only.

SSC - species of special concern; FP – Fully Protected

Scientific Name	Status	Habitat Requirements
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Common Name

California Native Plant Society rare plant rank status applies to plants only. A conservation status rank (also known as “rarity rank”) or a “high inventory priority” designation is used to determine the significance of project impacts to plant communities. The conservation status ranking system consists of a geographic scale (G=Global; S=State) and a degree of threat (1=critically imperiled; 2=imperiled; 3=vulnerable to extirpation or extinction; 4=apparently secure; and 5=demonstrably widespread, abundant, or secure). Plant community alliances with global or state conservation status ranks of G1 through G3, or S1 through S3, respectively, are considered to be “natural communities of special concern.

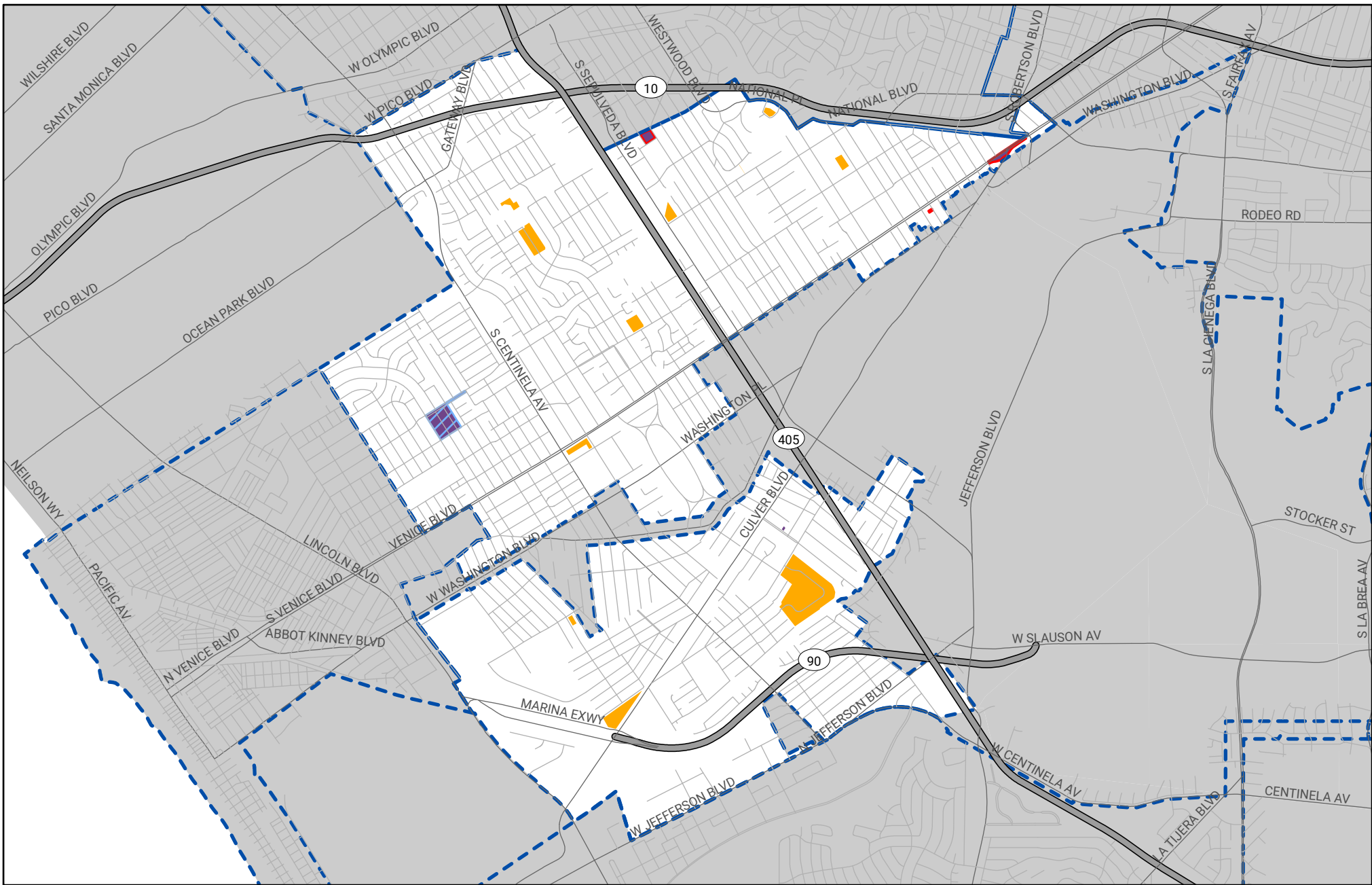
Source: California Department of Fish and Wildlife, California Natural Diversity Database (CNDDDB), <https://www.wildlife.ca.gov/Data/CNDDDB/Mapsand-Data>, February 2021.

# Appendix F

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Historic Resources Figures by Community Plan Area





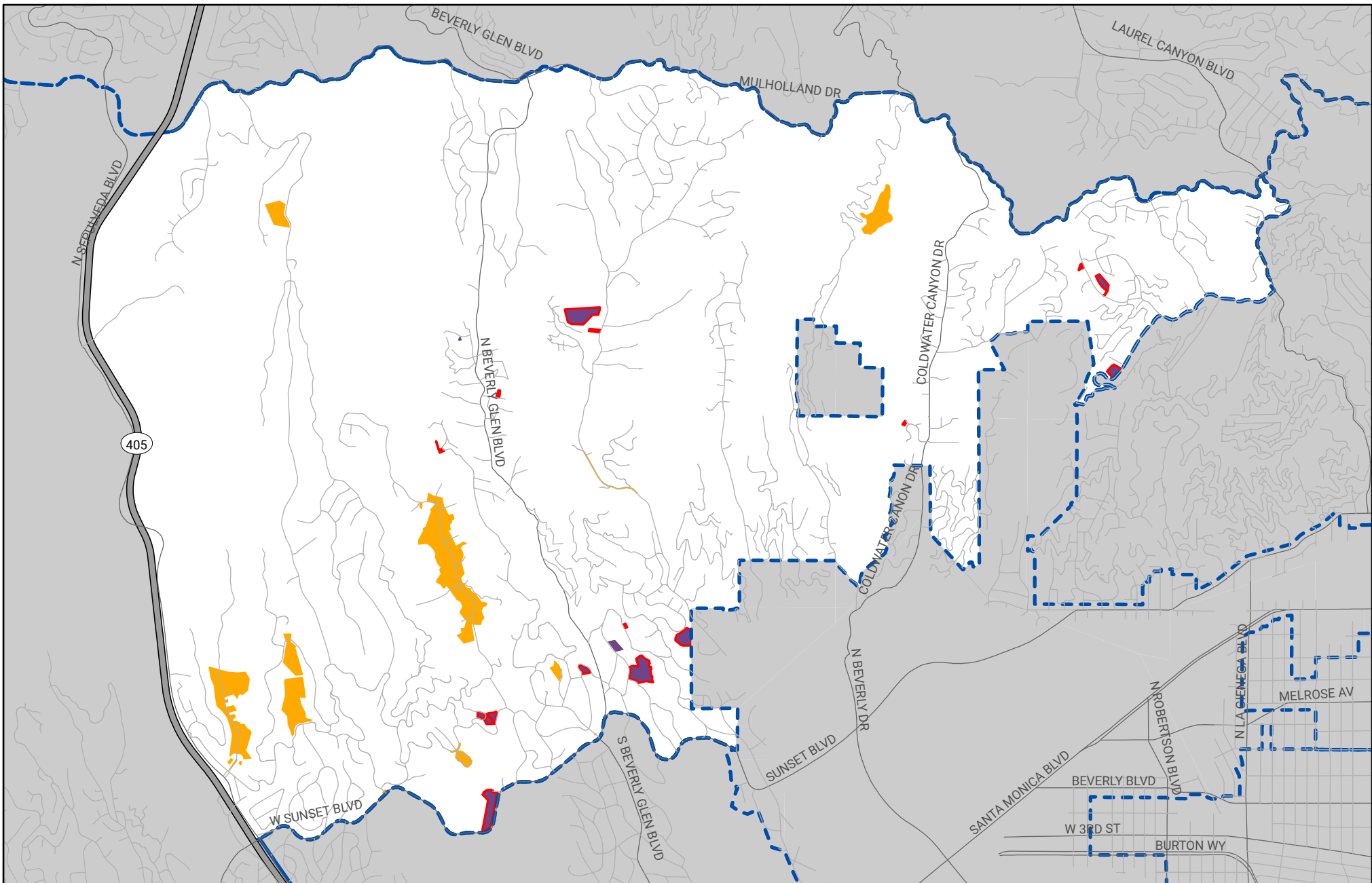
- Legend**
- CPA Boundary
  - HPOZ
  - HCM Demolished
  - HCM
  - Designated Resources
  - Eligible Resources



**Palms - Mar Vista - Del Rey - Community Plan Area**  
 City of Los Angeles







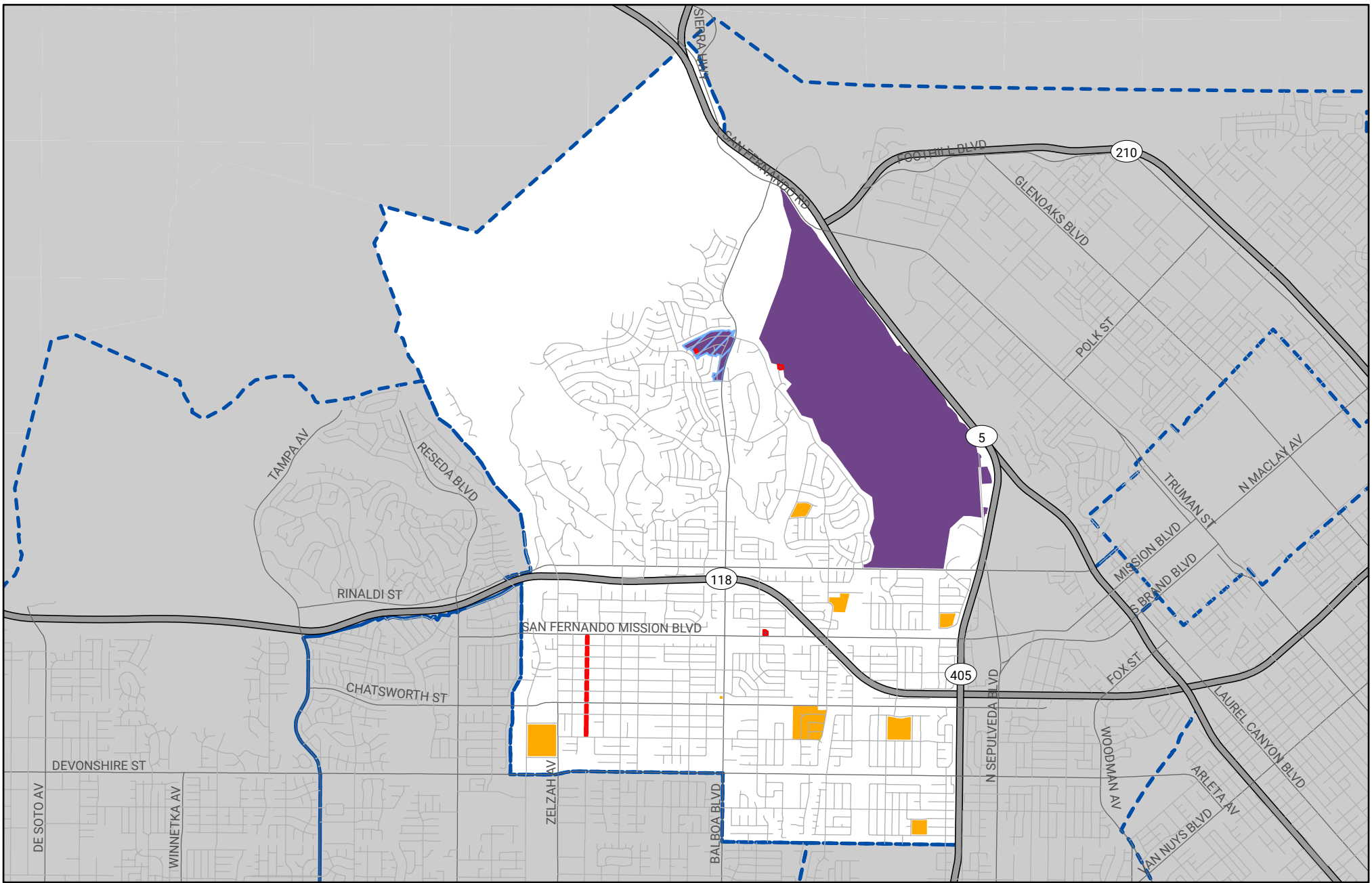
**Legend**

- CPA Boundary
- HCM Demolished
- Designated Resources
- HPOZ
- HCM
- Eligible Resources



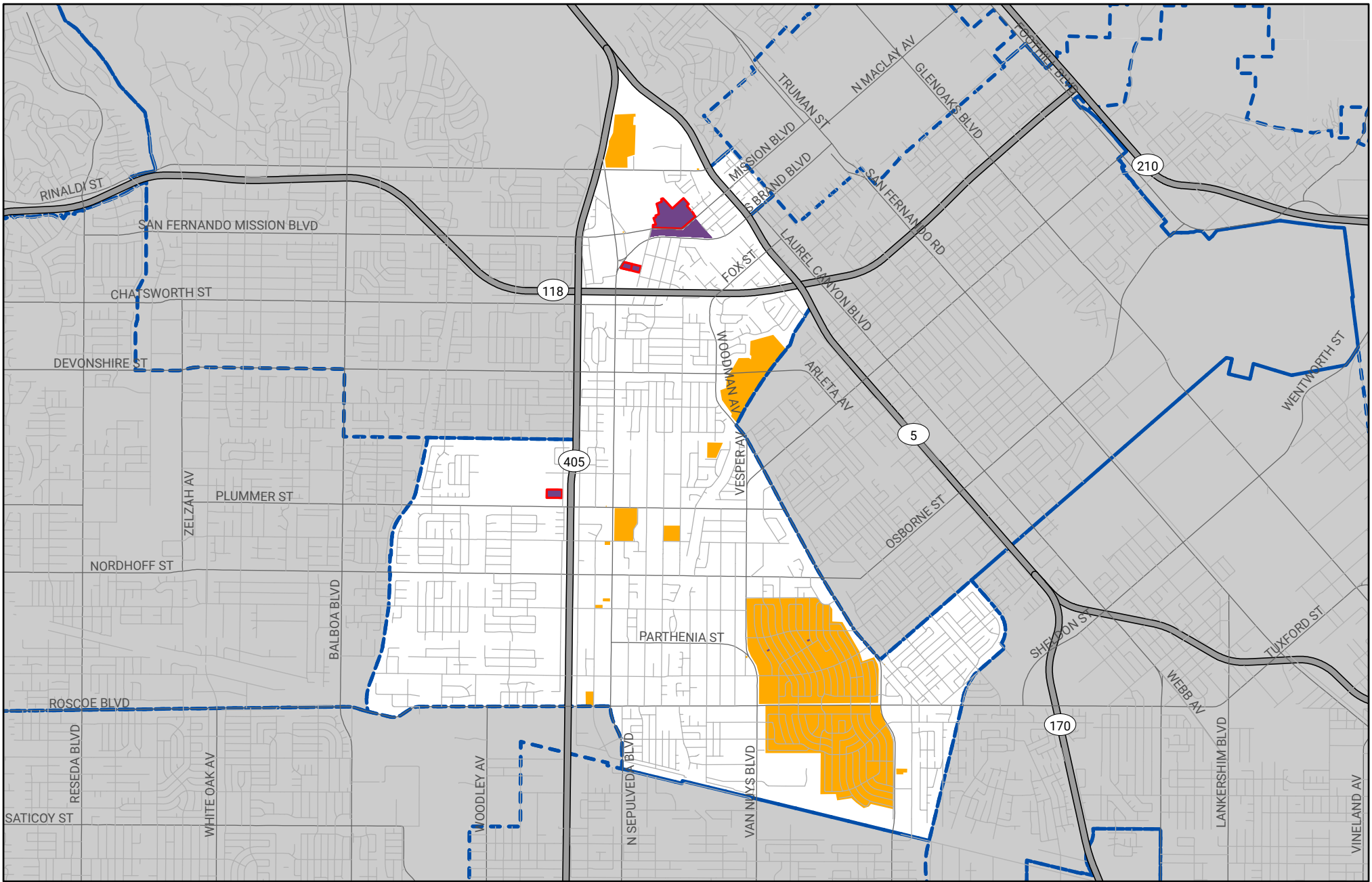
**Bel Air - Beverly Crest - Community Plan Area**  
City of Los Angeles





- Legend**
- CPA Boundary
  - HCM Demolished
  - Designated Resources
  - HPOZ
  - HCM
  - Eligible Resources

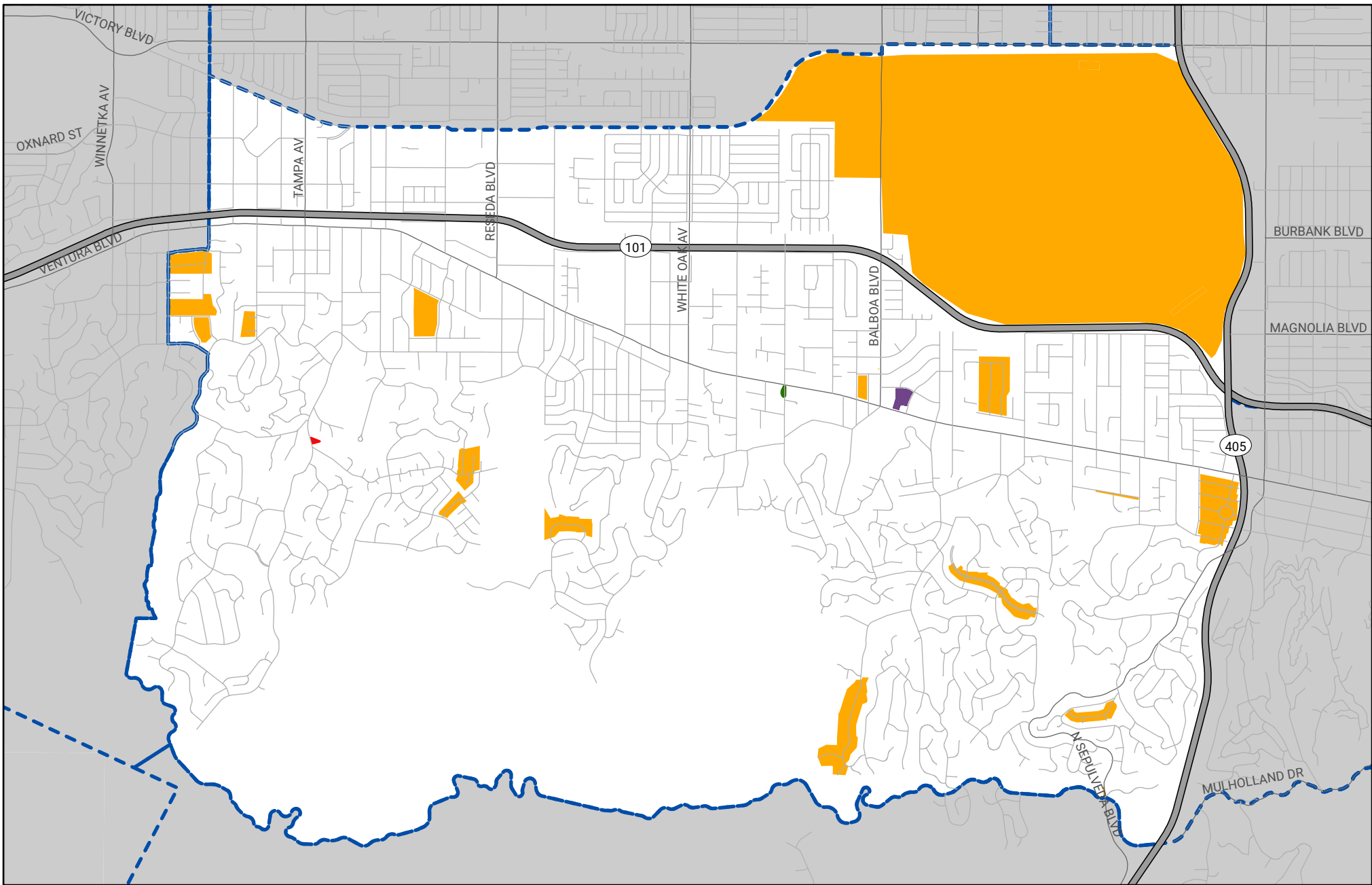




- Legend**
- CPA Boundary
  - HCM Demolished
  - Designated Resources
  - HPOZ
  - HCM
  - Eligible Resources

**Mission Hills - Panorama City - North Hills - Community Plan Area**



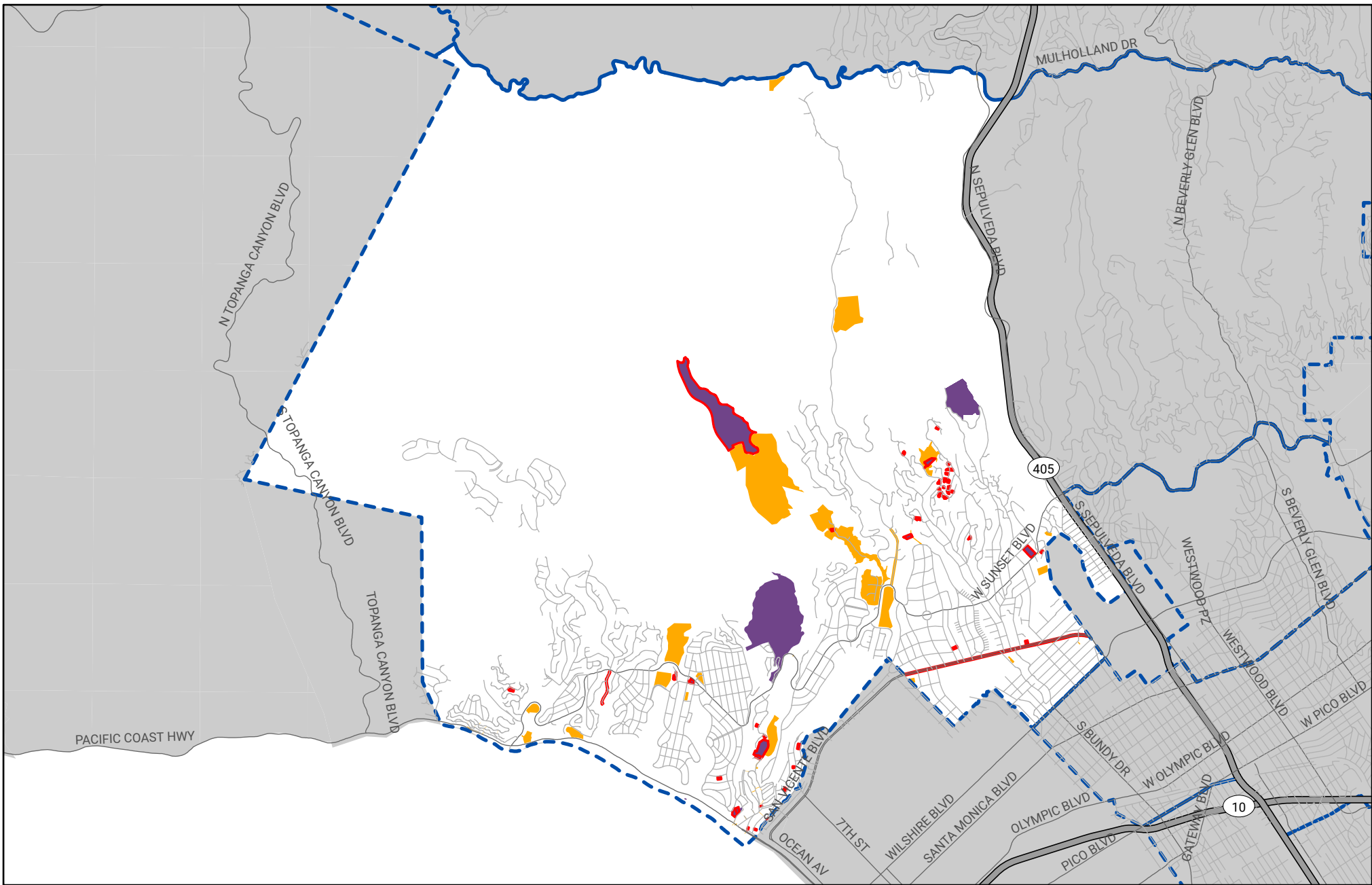


- Legend**
- CPA Boundary
  - HCM Demolished
  - Designated Resources
  - HCM
  - HPOZ
  - Eligible Resources



**Encino - Tarzana - Community Plan Area**  
City of Los Angeles



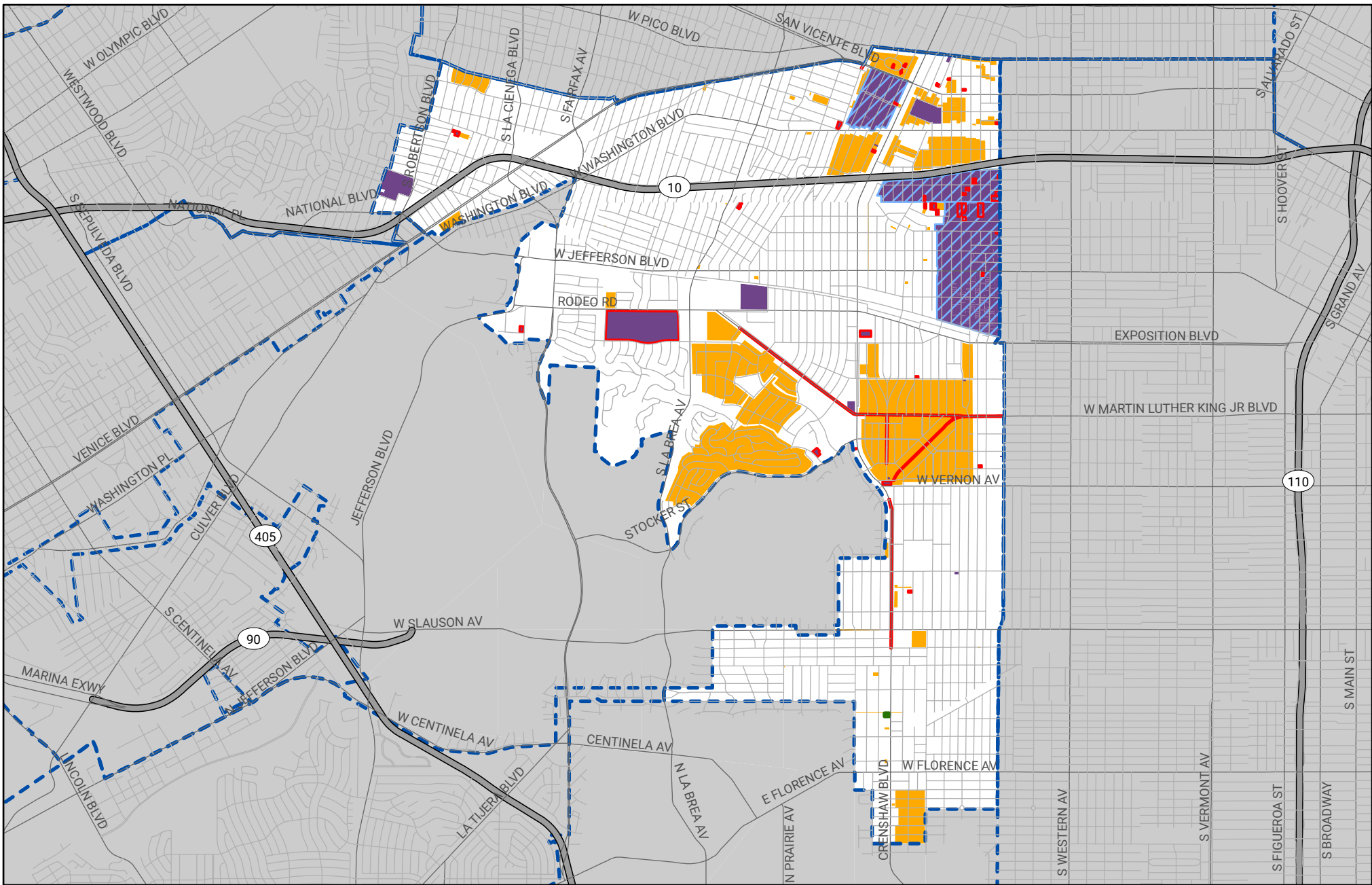








- Legend**
- CPA Boundary
  - HCM Demolished
  - Designated Resources
  - HCM
  - Eligible Resources
  - HPOZ



**Brentwood - Pacific Palisades - Community Plan Area**  
 City of Los Angeles



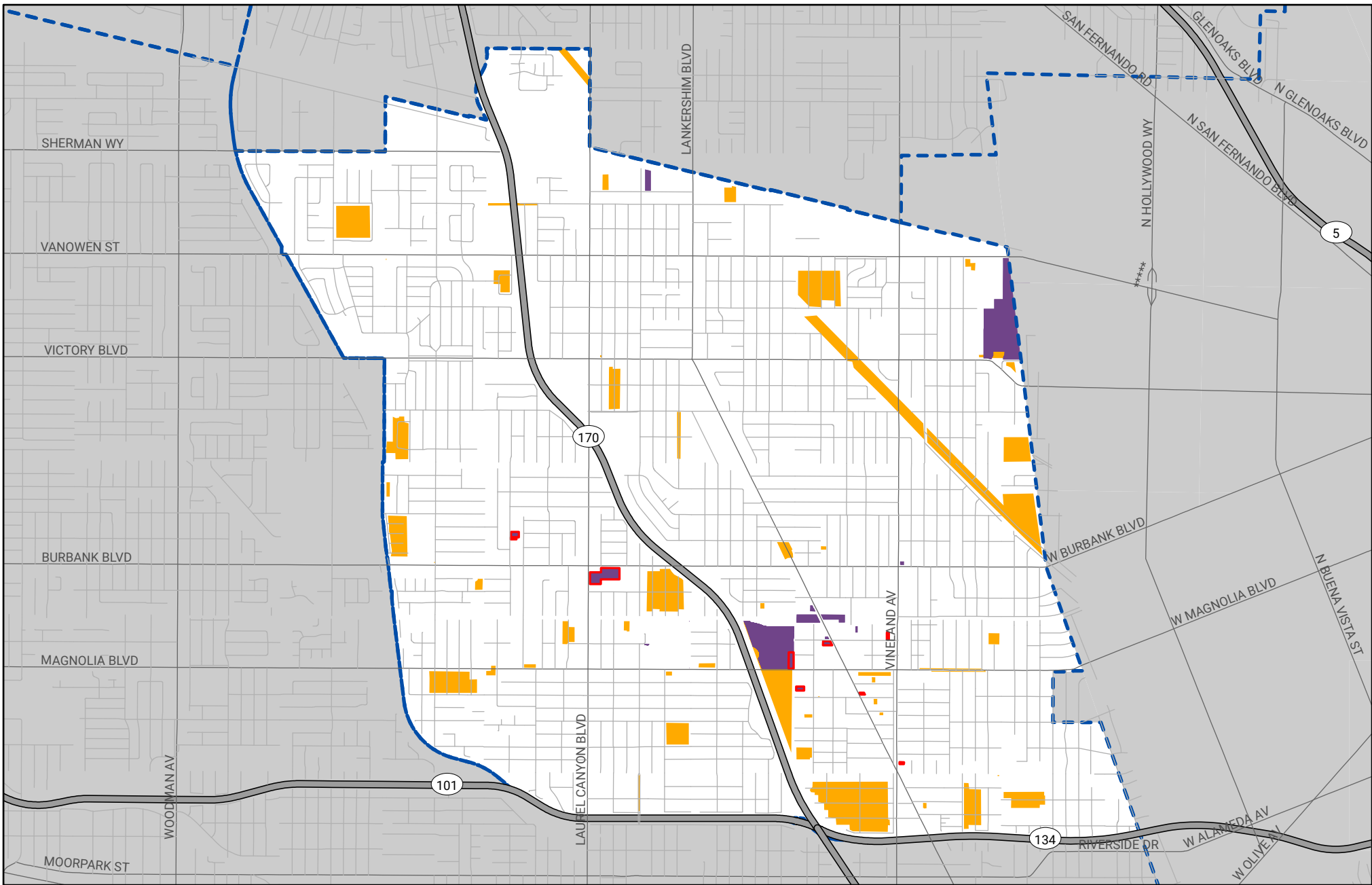


- Legend**
-  CPA Boundary
  -  HCM Demolished
  -  Designated Resources
  -  HPOZ
  -  HCM
  -  Eligible Resources

**West Adams - Baldwin Hills - Leimert - Community Plan Area**

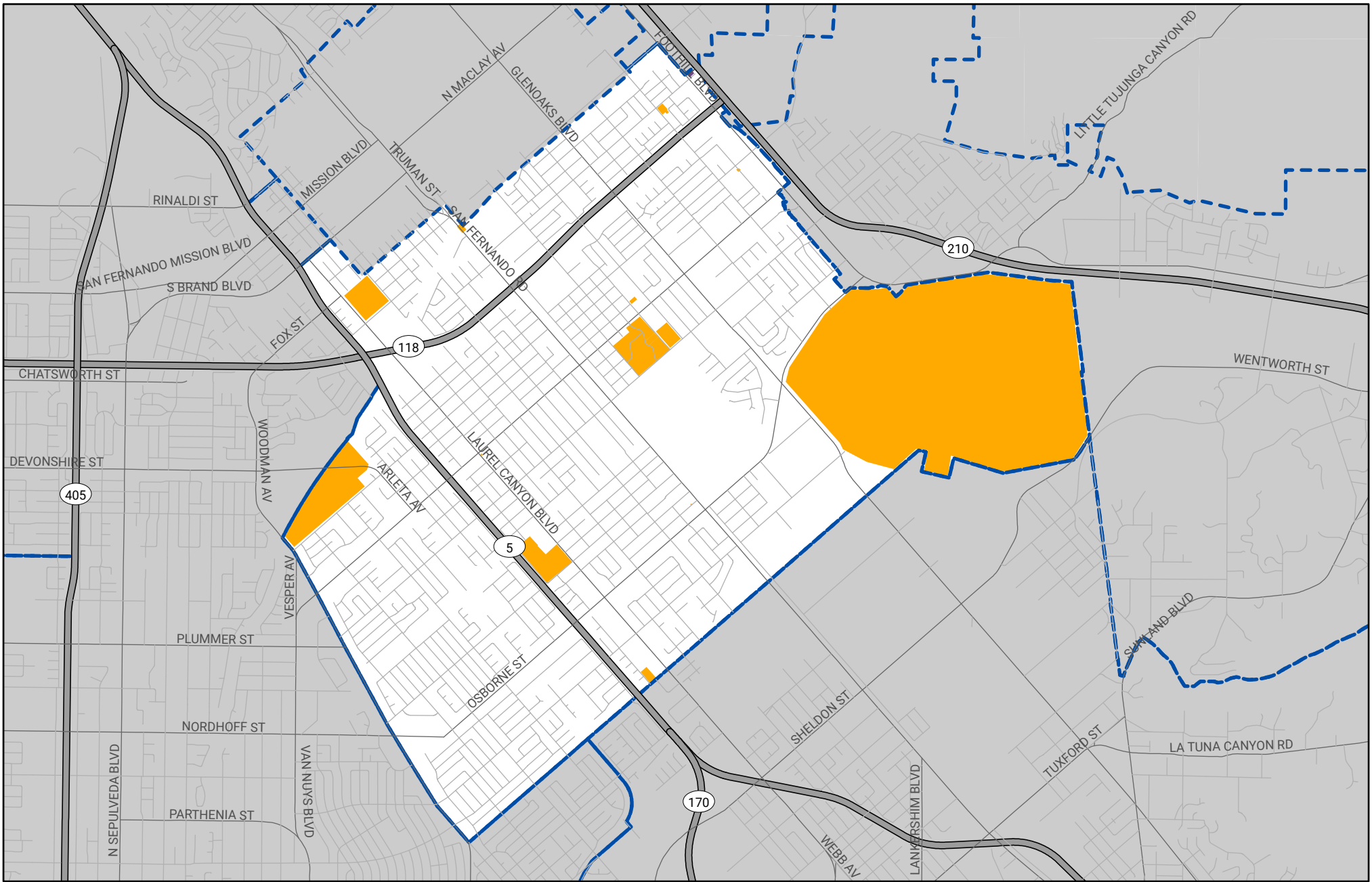
City of Los Angeles





- Legend**
- CPA Boundary
  - HCM Demolished
  - Designated Resources
  - HCM
  - Eligible Resources
  - HPOZ

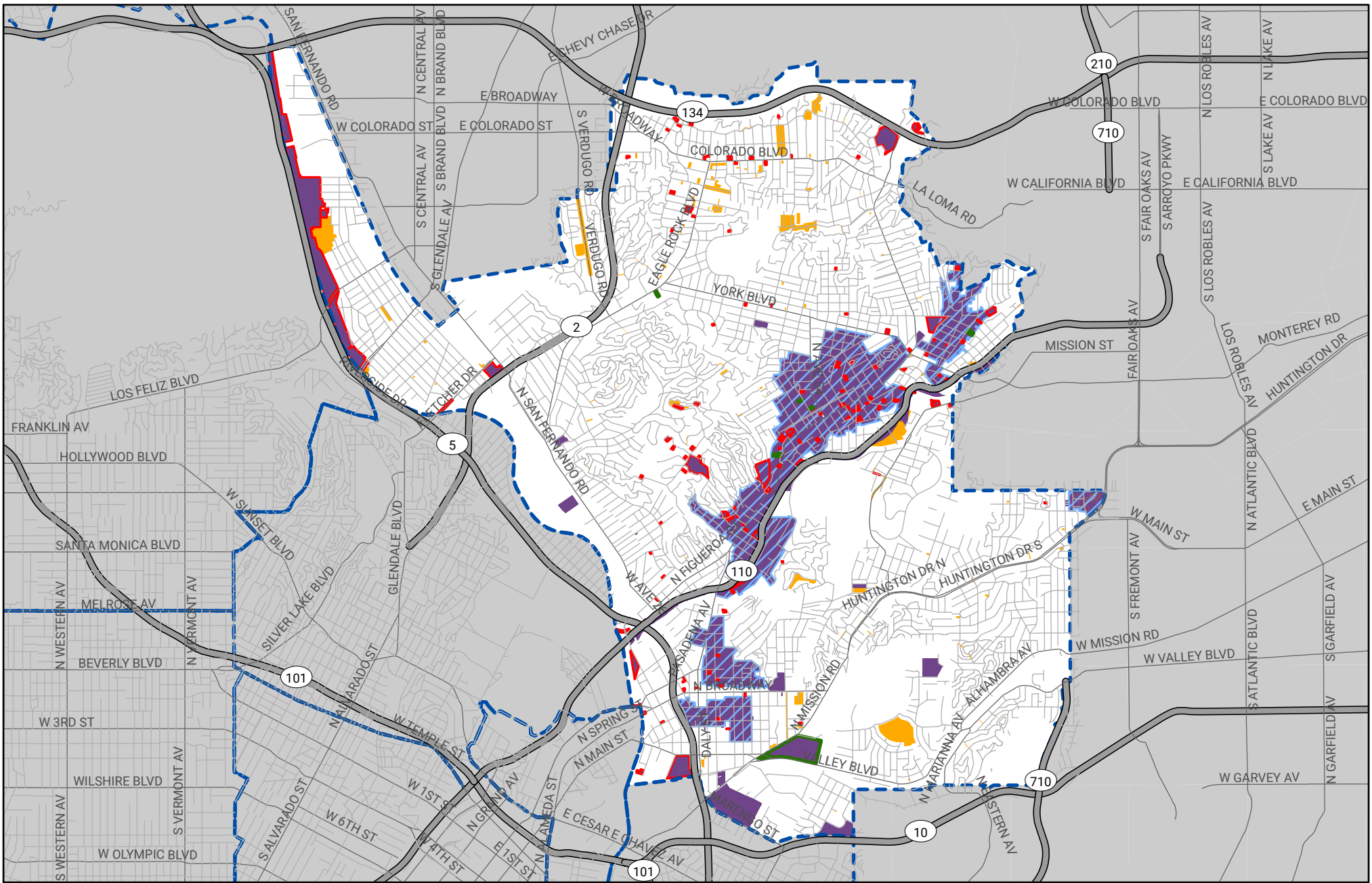




- Legend**
- CPA Boundary
  - HCM Demolished
  - Designated Resources
  - HPOZ
  - HCM
  - Eligible Resources





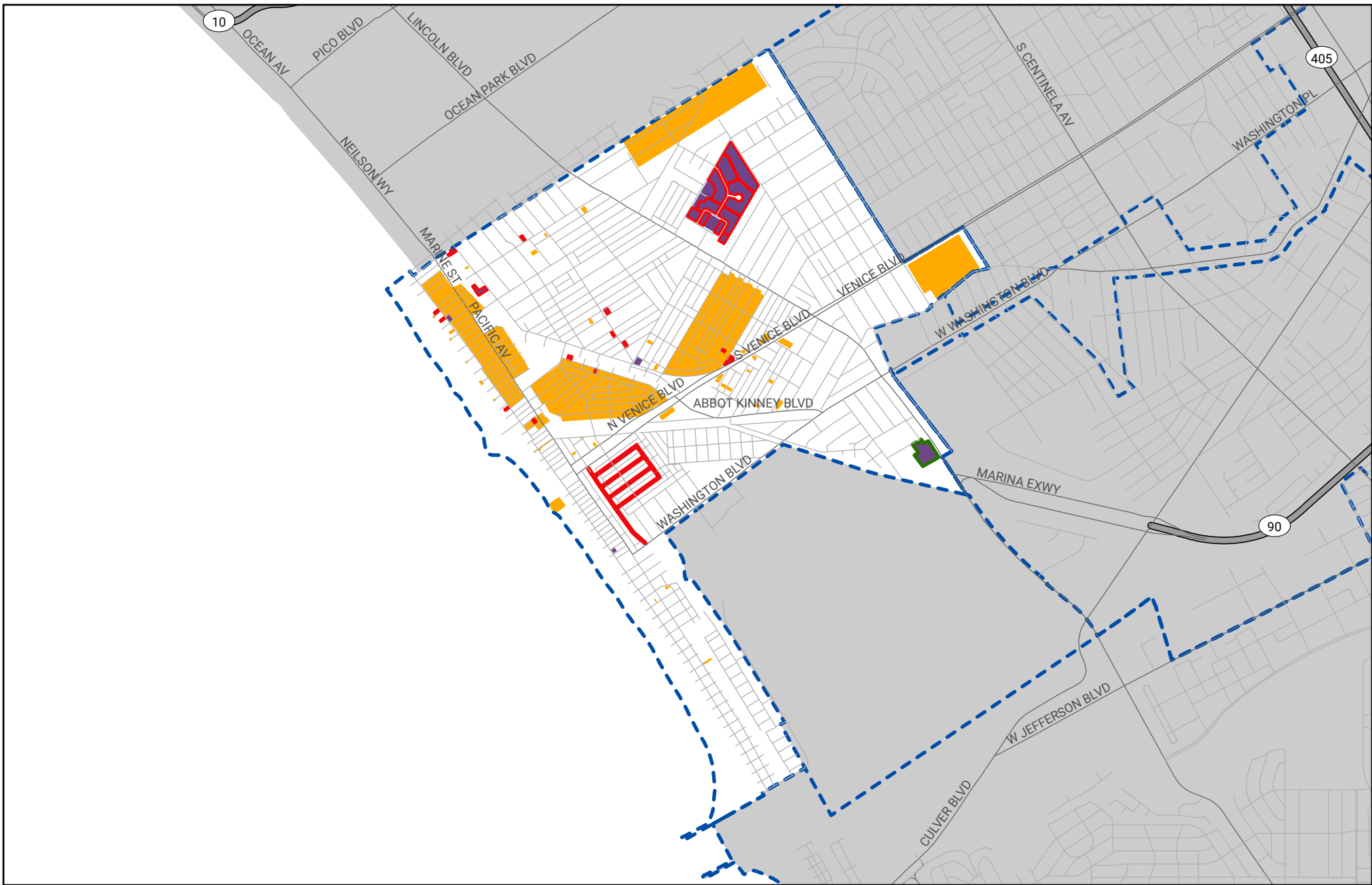


- Legend**
- CPA Boundary
  - HCM Demolished
  - Designated Resources
  - HCM
  - HPOZ
  - Eligible Resources



**Northeast Los Angeles - Community Plan Area**  
City of Los Angeles





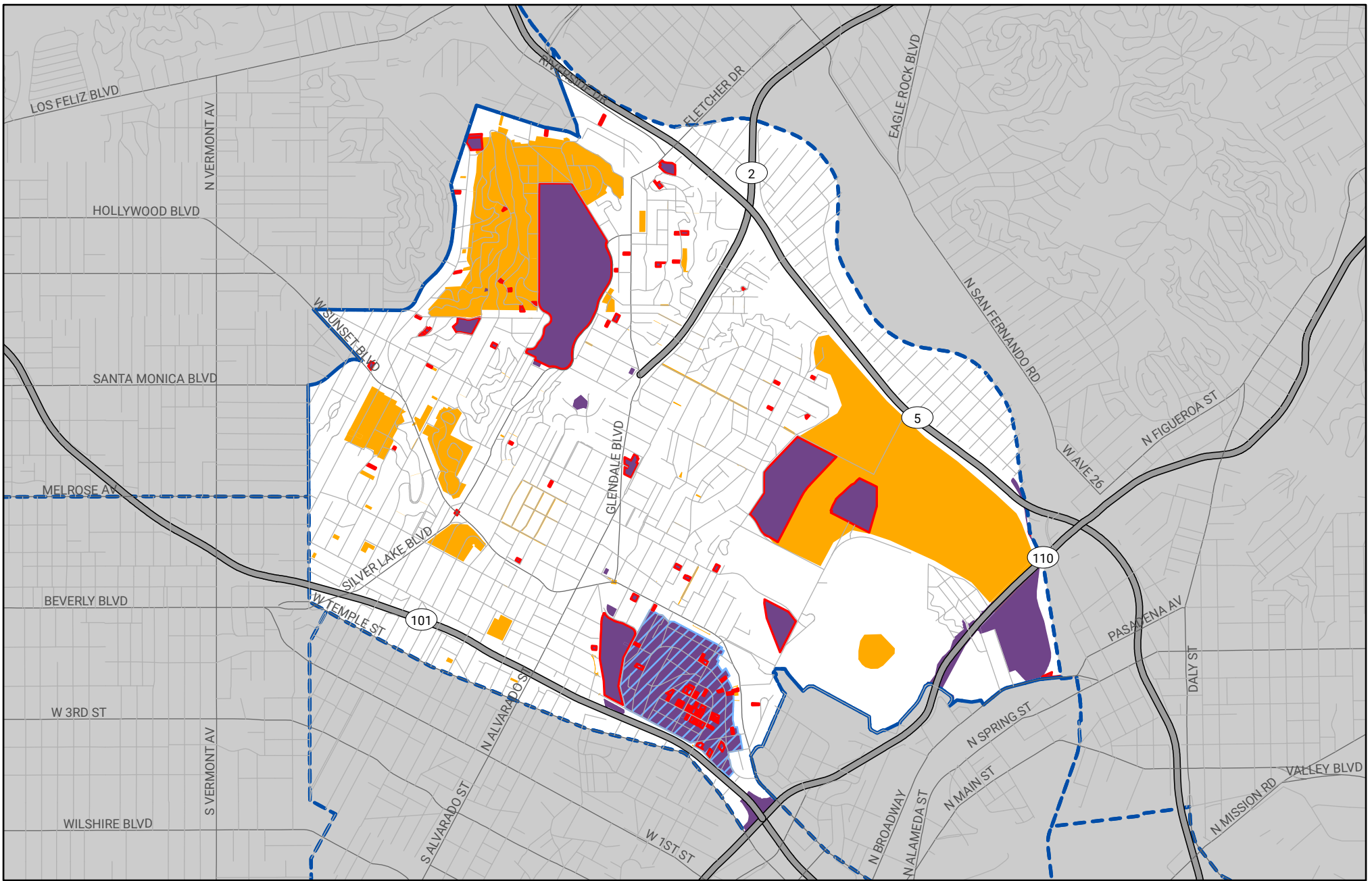
**Legend**

- CPA Boundary
- HCM Demolished
- Designated Resources
- HCM
- Eligible Resources
- HPOZ



**Venice - Community Plan Area**  
City of Los Angeles





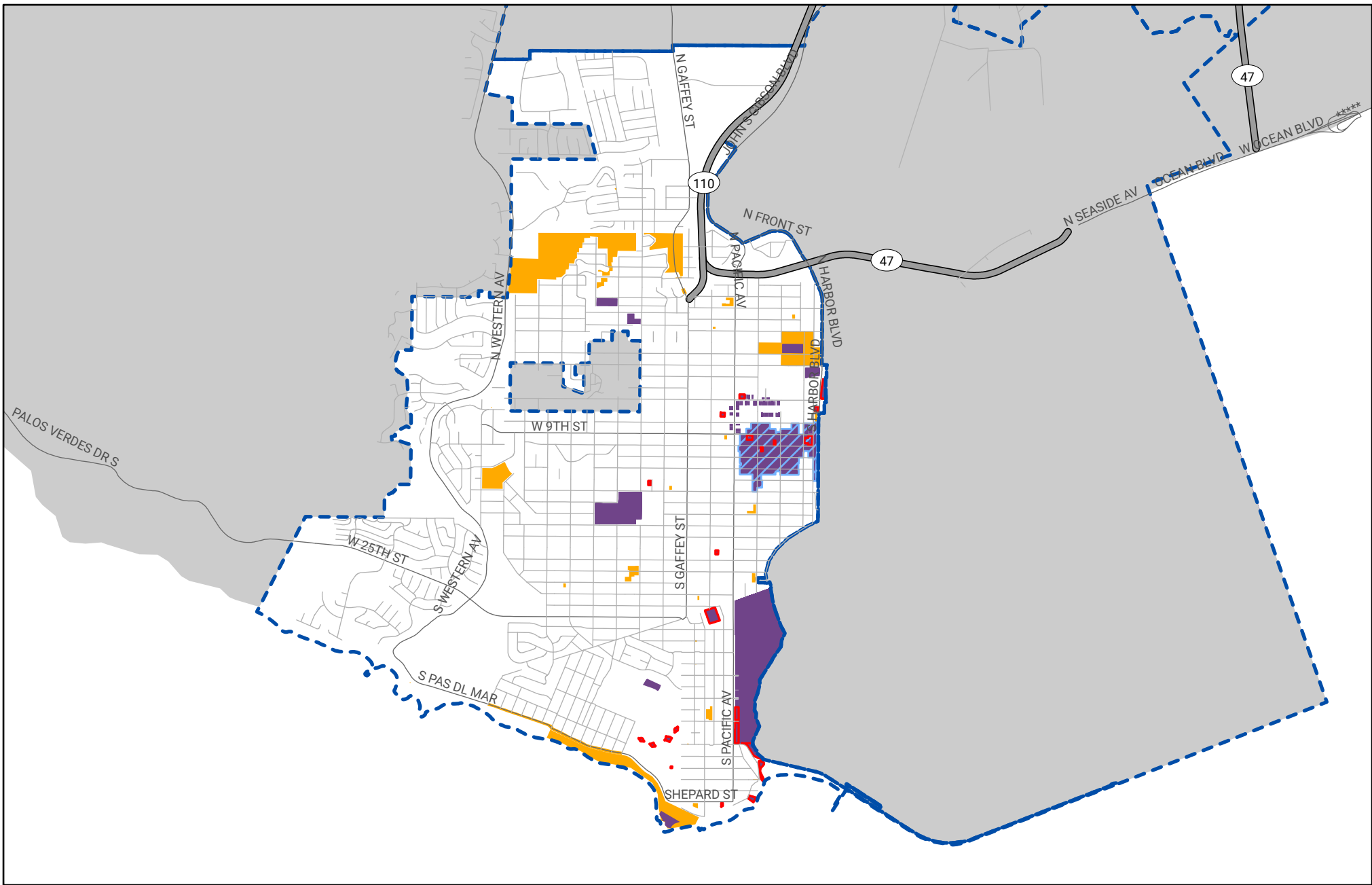
**Legend**

- CPA Boundary
- HCM Demolished
- Designated Resources
- HCM
- Eligible Resources
- HPOZ



**Silver Lake - Echo Park - Elysian Valley - Community Plan Area**  
 City of Los Angeles





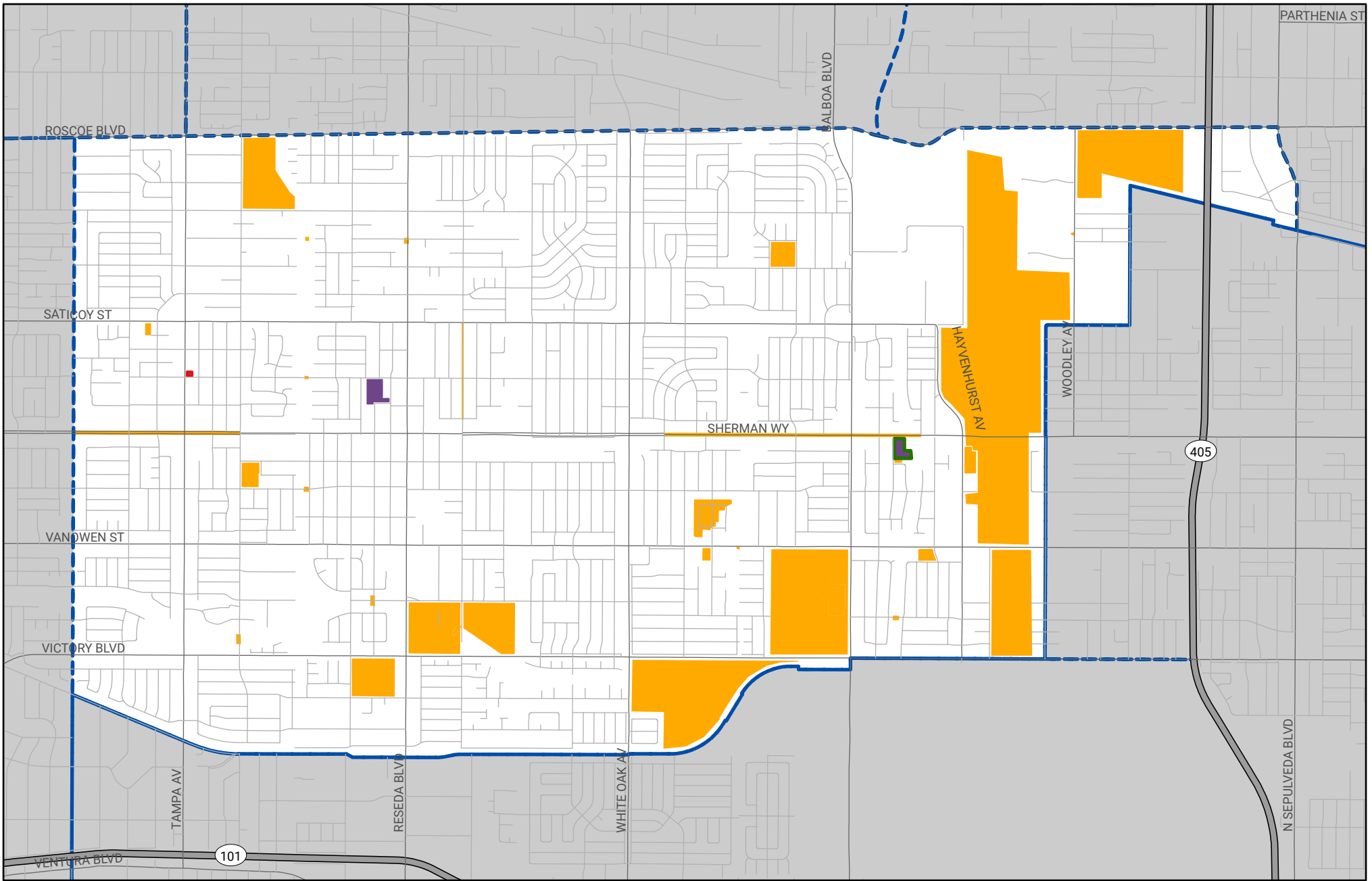
**Legend**

- CPA Boundary
- HCM Demolished
- Designated Resources
- HCM
- Eligible Resources
- HPOZ



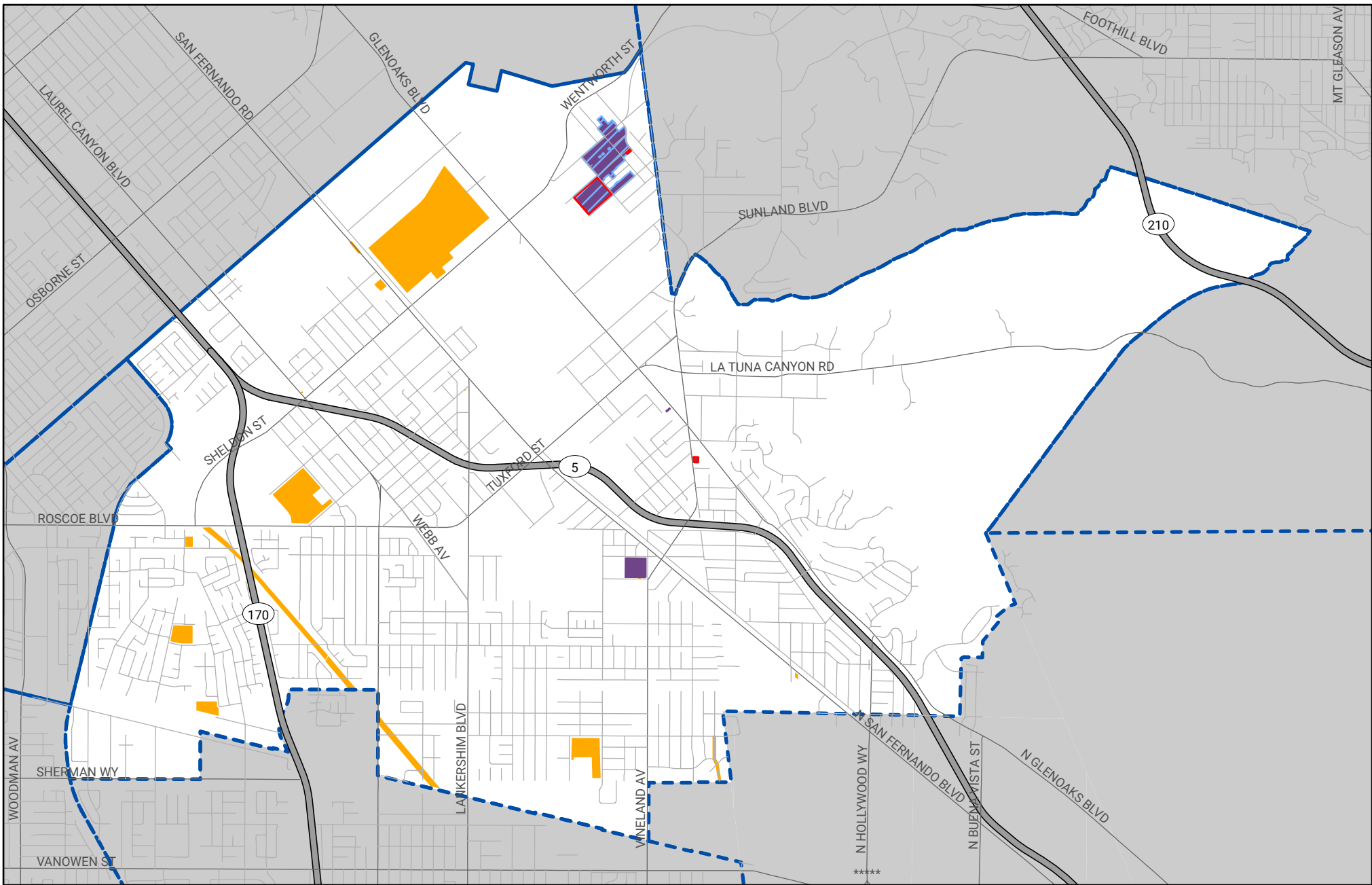
**San Pedro - Community Plan Area**  
City of Los Angeles





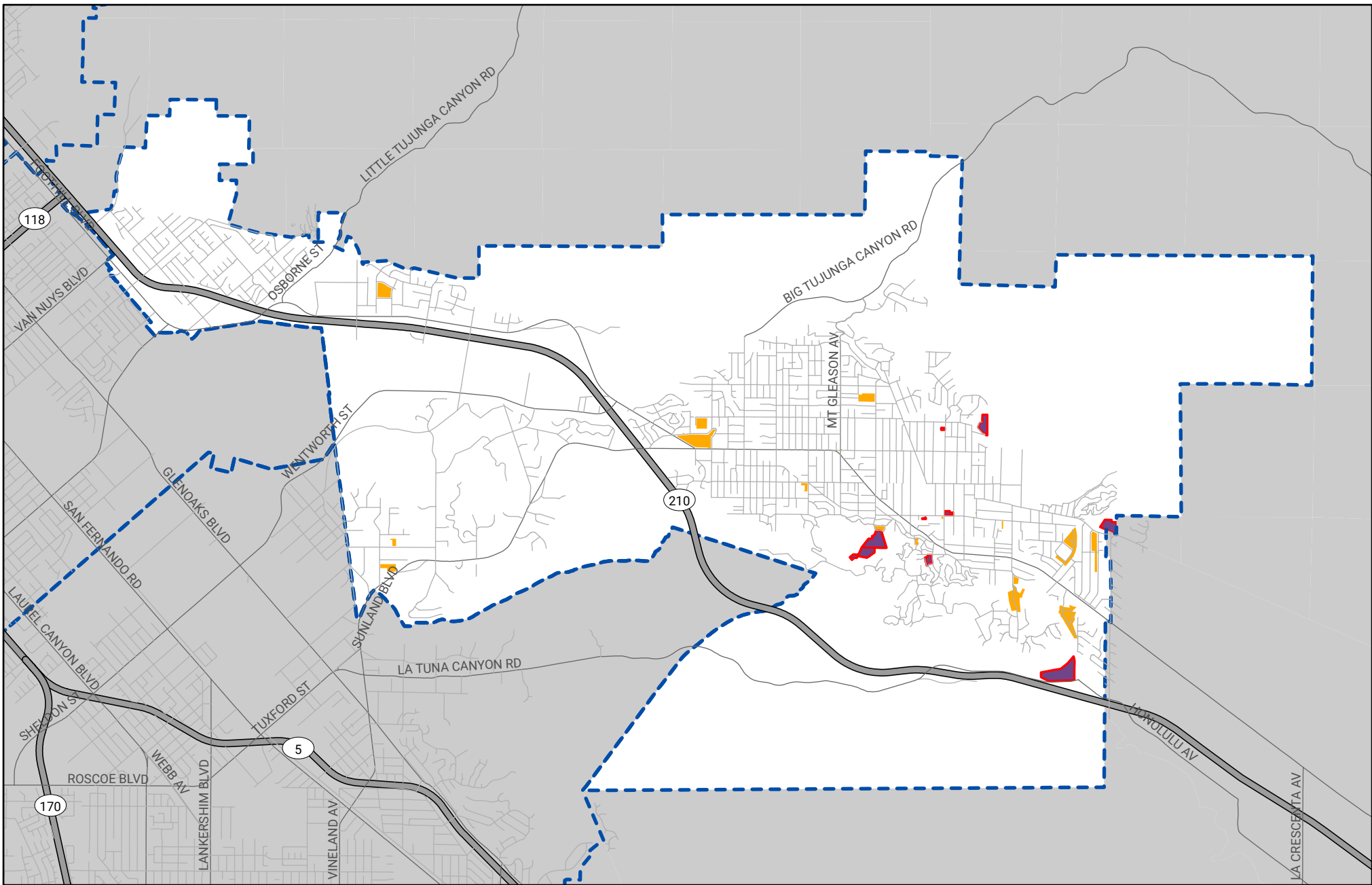
- Legend**
- CPA Boundary
  - HCM
  - HCM Demolished
  - Designated Resources
  - Eligible Resources
  - HPOZ





- Legend**
- CPA Boundary
  - HCM Demolished
  - Designated Resources
  - HPOZ
  - HCM
  - Eligible Resources



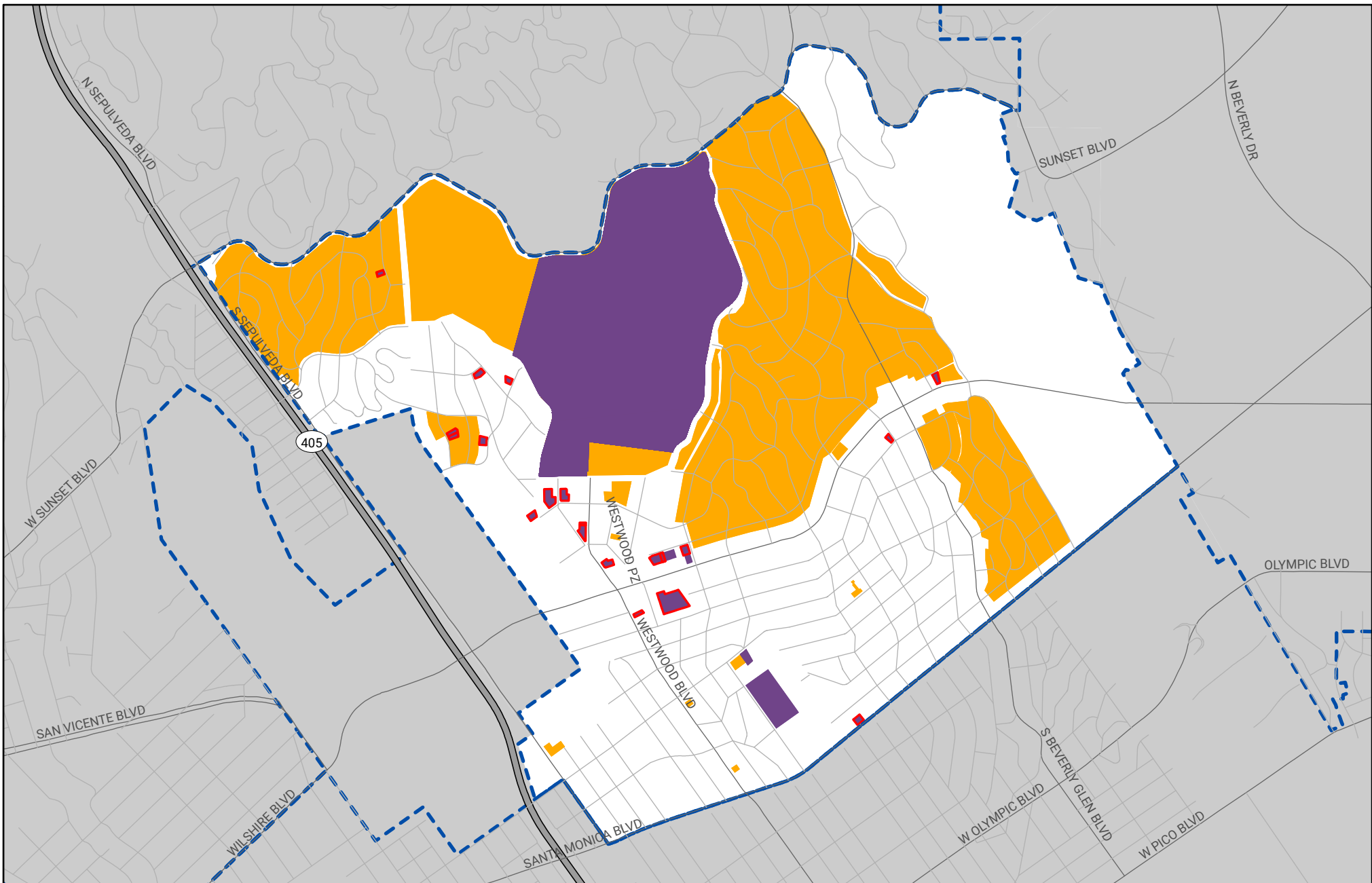


- Legend**
- CPA Boundary
  - HCM Demolished
  - Designated Resources
  - HPOZ
  - HCM
  - Eligible Resources



**Sunland - Tujunga - Lake View Terrace - Shadow Hills - East La Tuna Canyon - Community Plan Area**  
 City of Los Angeles





**Legend**

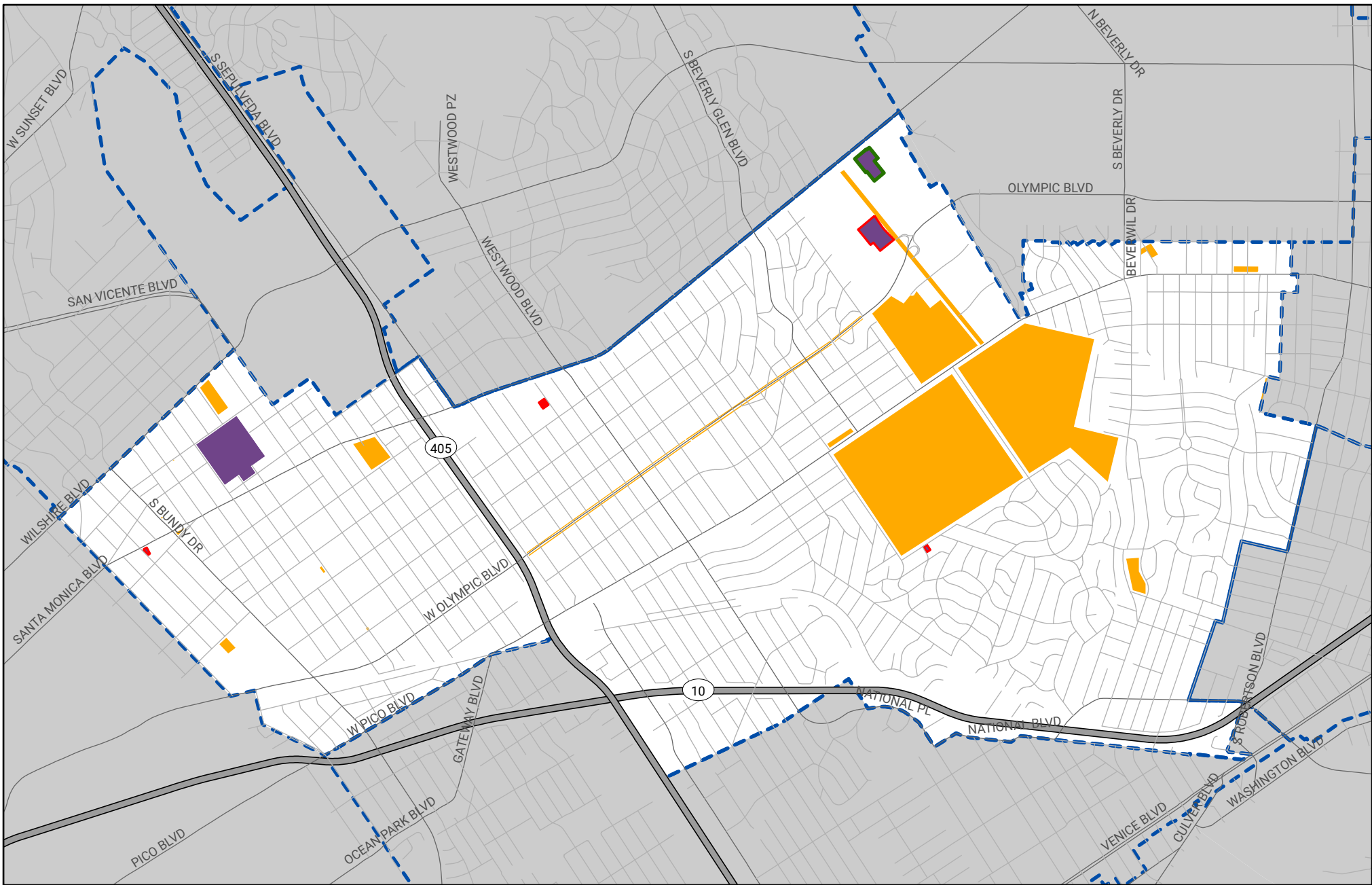
- CPA Boundary
- HPOZ
- HCM Demolished
- HCM
- Designated Resources
- Eligible Resources



**Westwood - Community Plan Area**  
City of Los Angeles





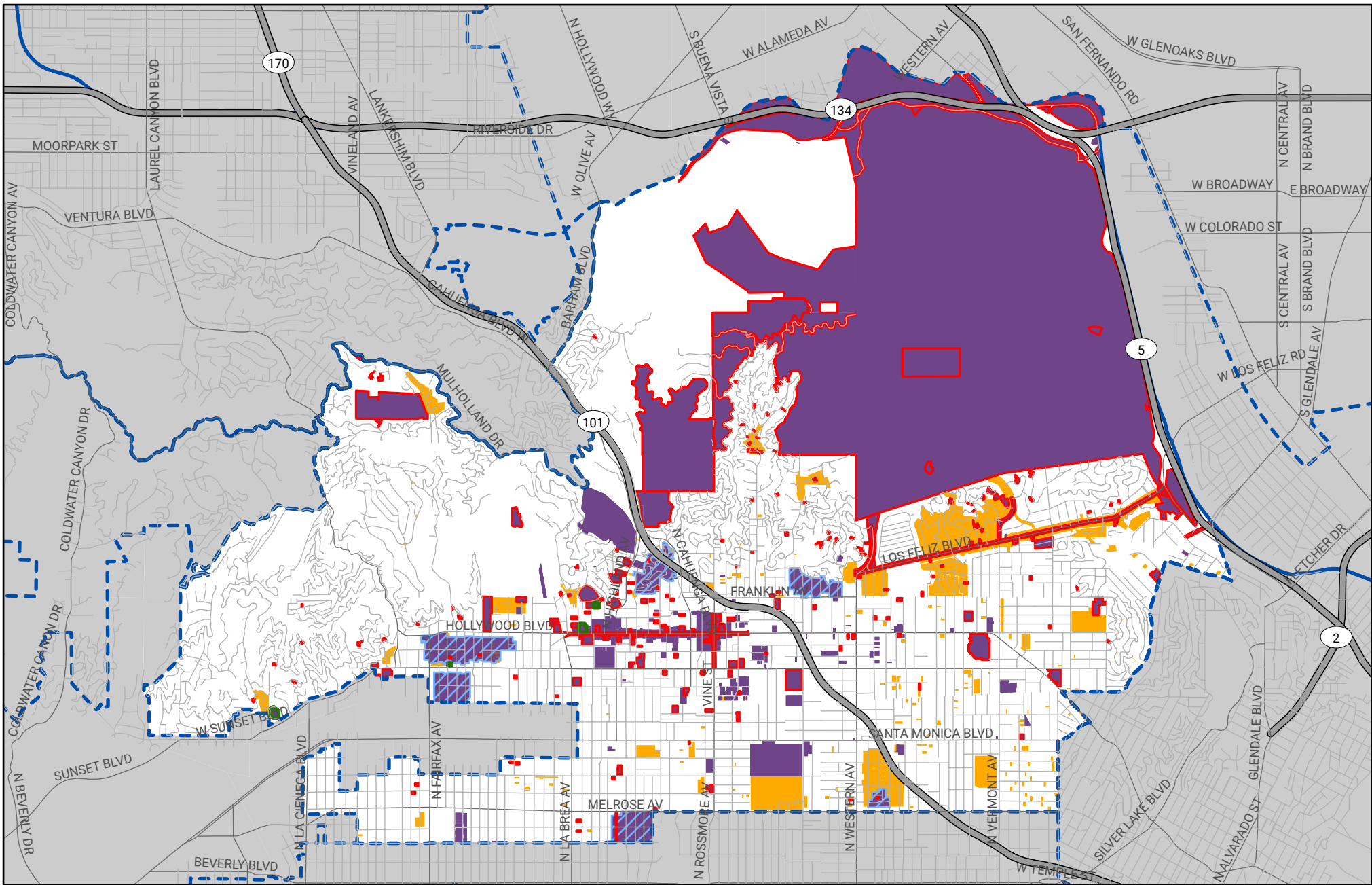


- Legend**
- CPA Boundary
  - HCM Demolished
  - Designated Resources
  - HPOZ
  - HCM
  - Eligible Resources



**West Los Angeles - Community Plan Area**  
City of Los Angeles



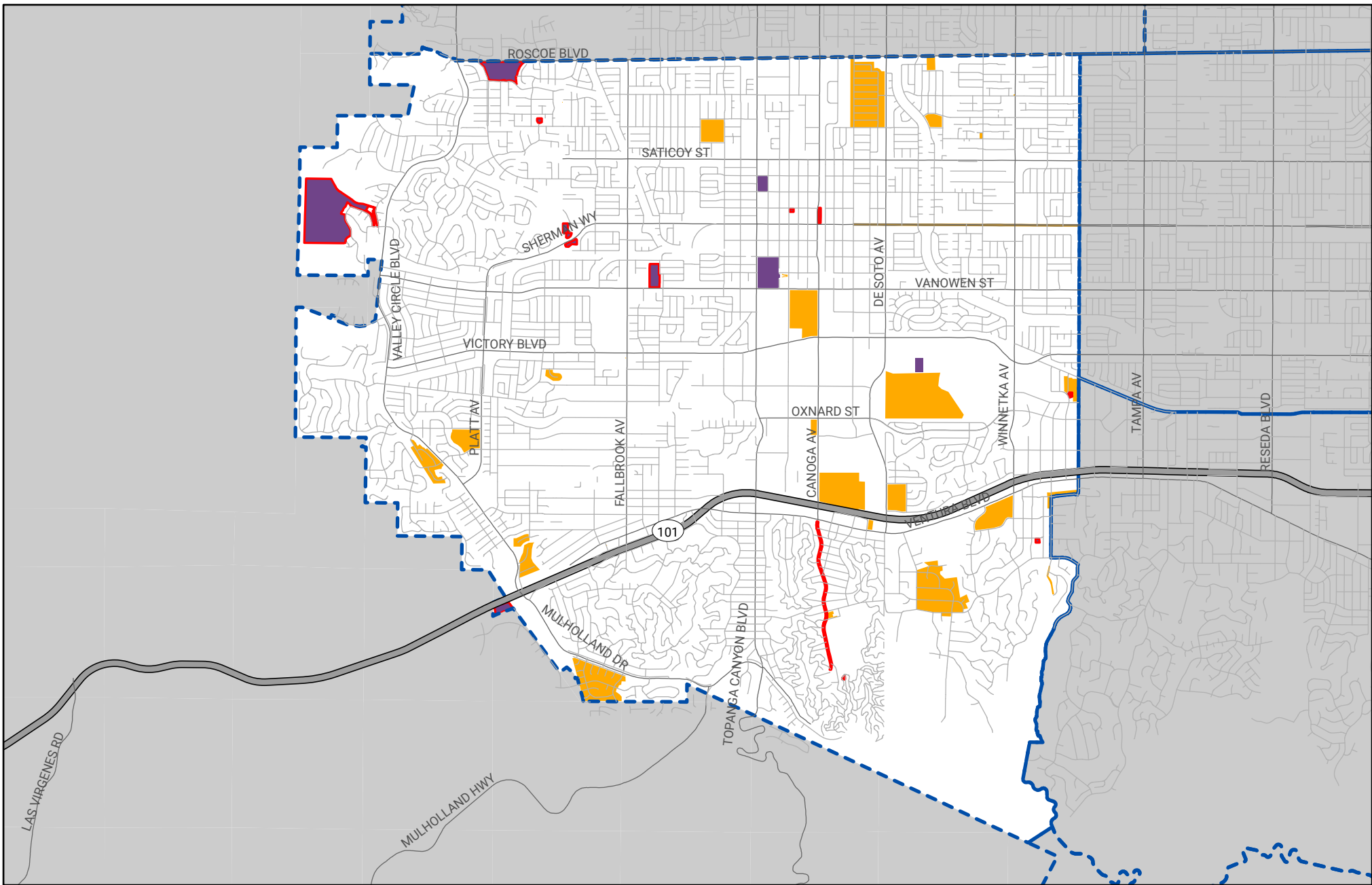


- Legend**
- CPA Boundary
  - HCM Demolished
  - Designated Resources
  - HCM
  - Eligible Resources
  - HPOZ



**Hollywood - Community Plan Area**  
City of Los Angeles





**Legend**

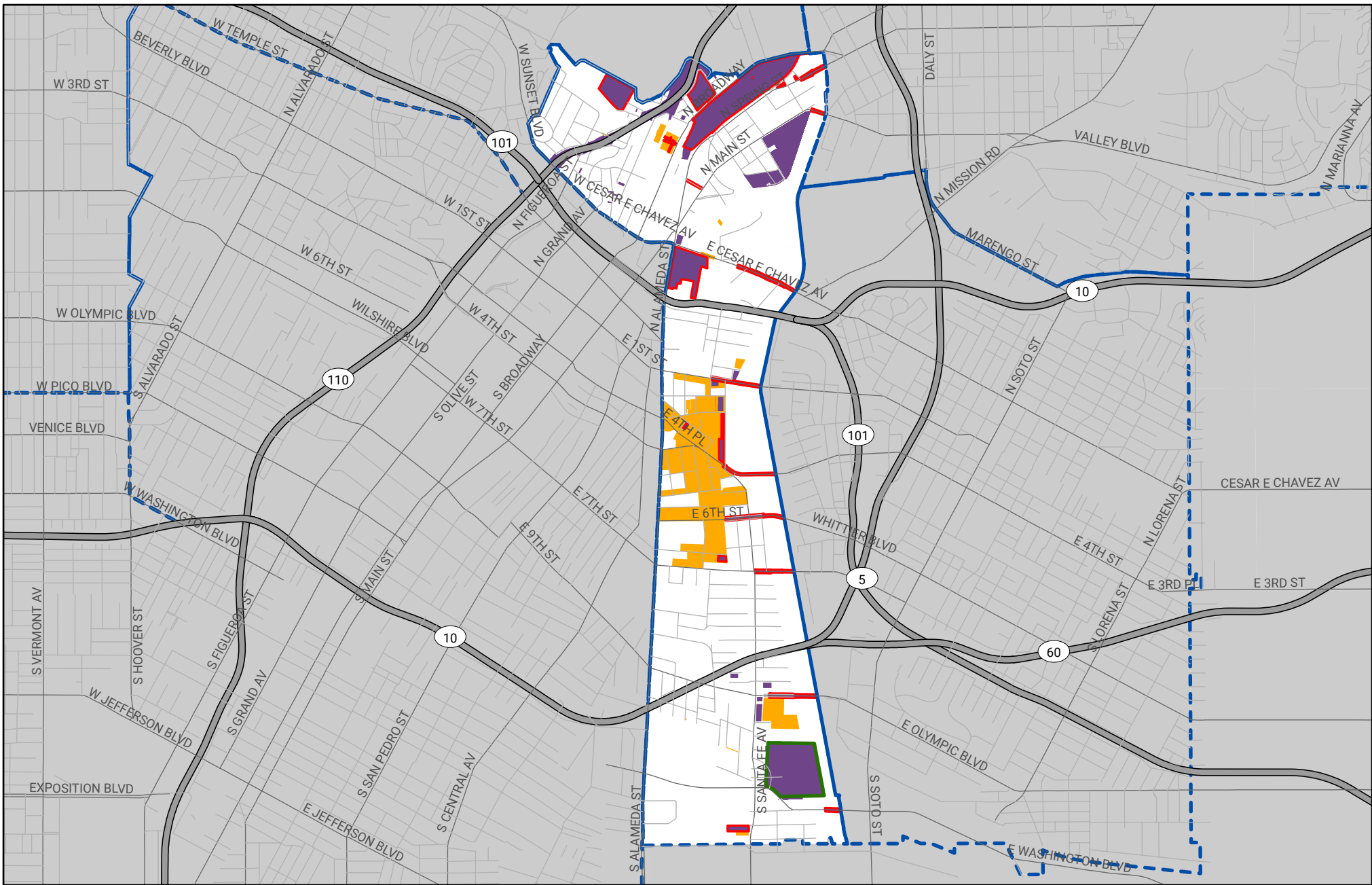
- CPA Boundary
- HCM Demolished
- Designated Resources
- HPOZ
- HCM
- Eligible Resources

**Canoga Park - Winnetka - Woodland Hills - West Hills - Community Plan Area**



City of Los Angeles



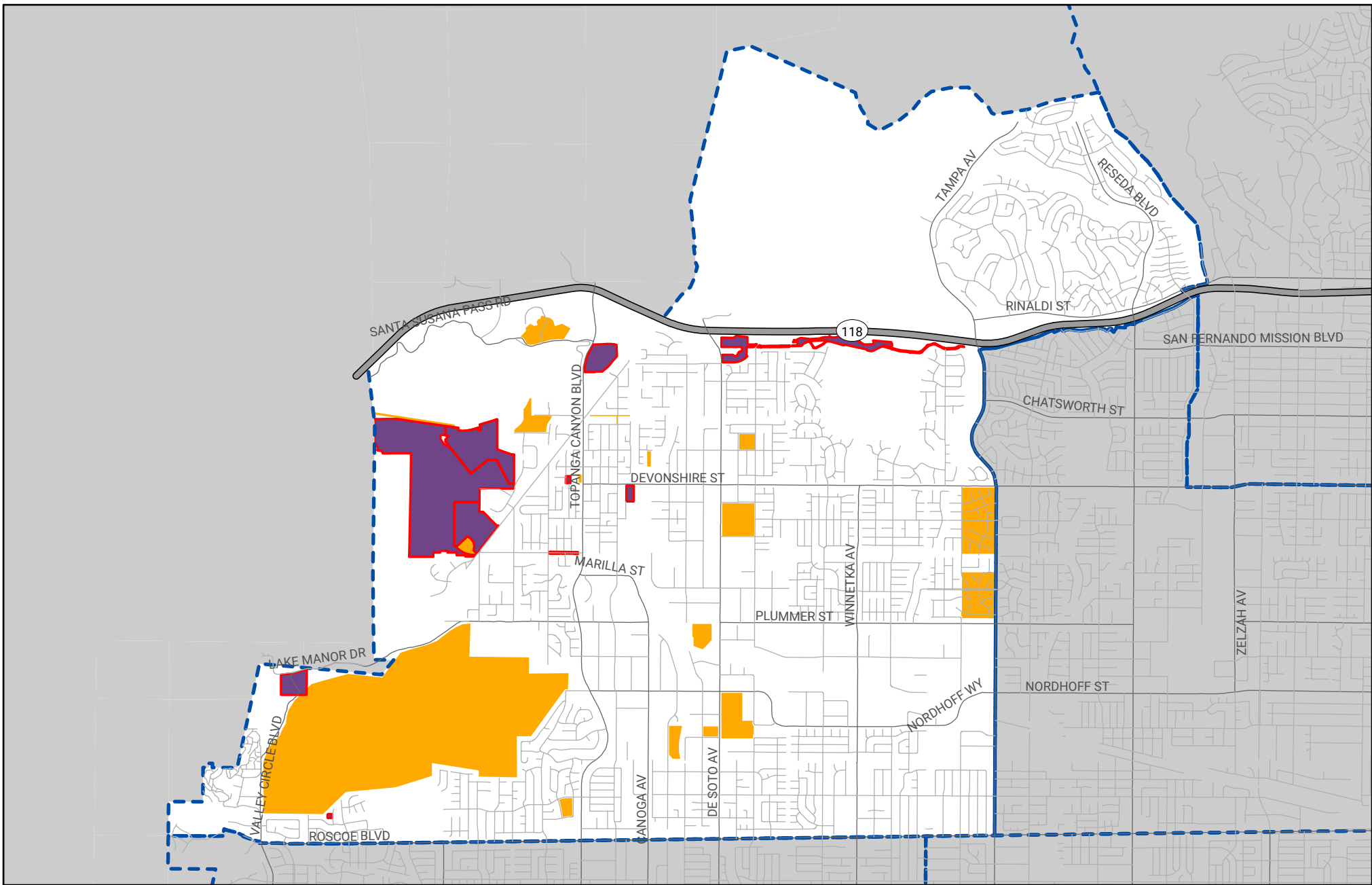


- Legend**
- CPA Boundary
  - HCM Demolished
  - Designated Resources
  - HPOZ
  - HCM
  - Eligible Resources



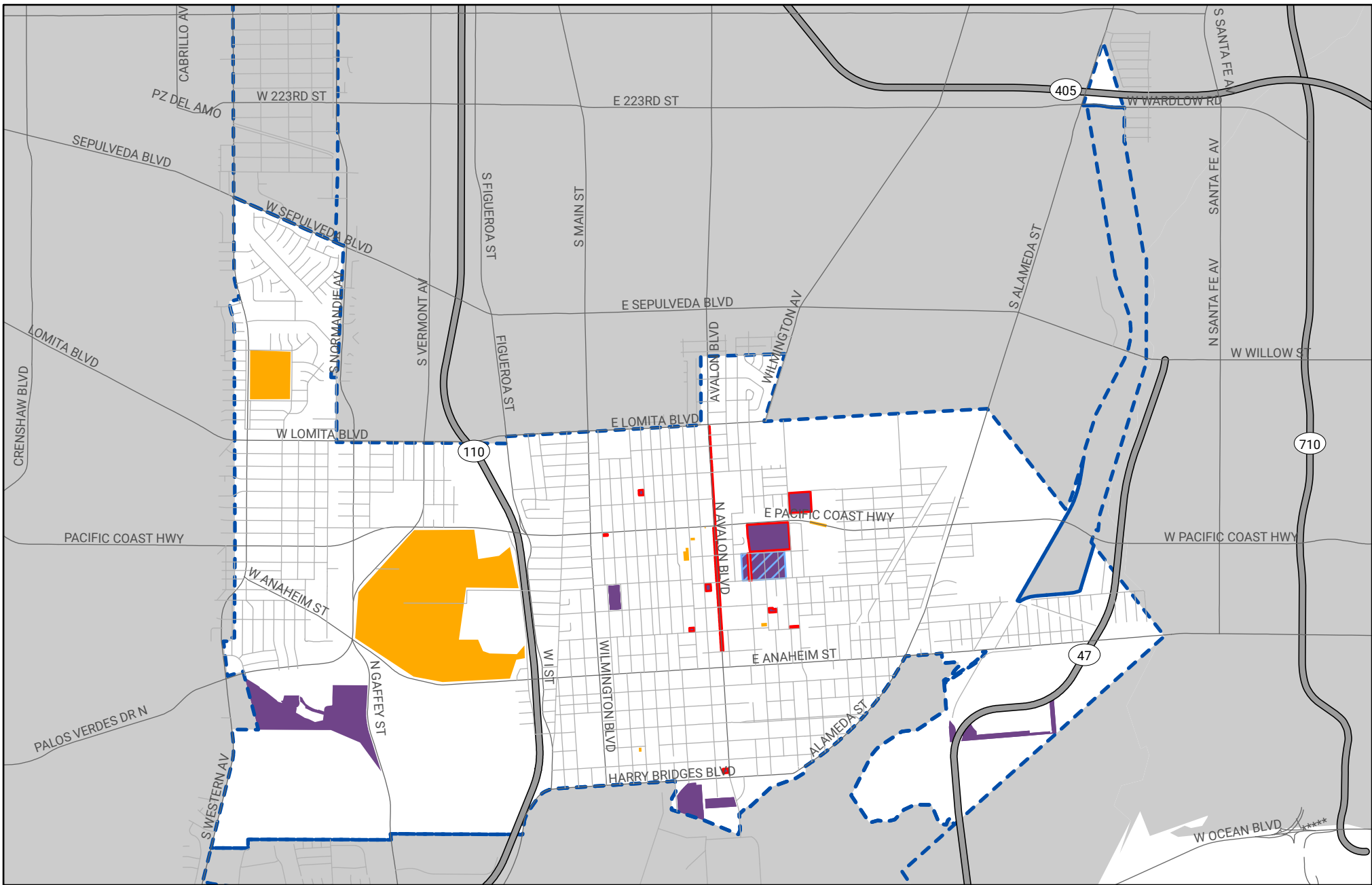
**Central City North - Community Plan Area**  
City of Los Angeles





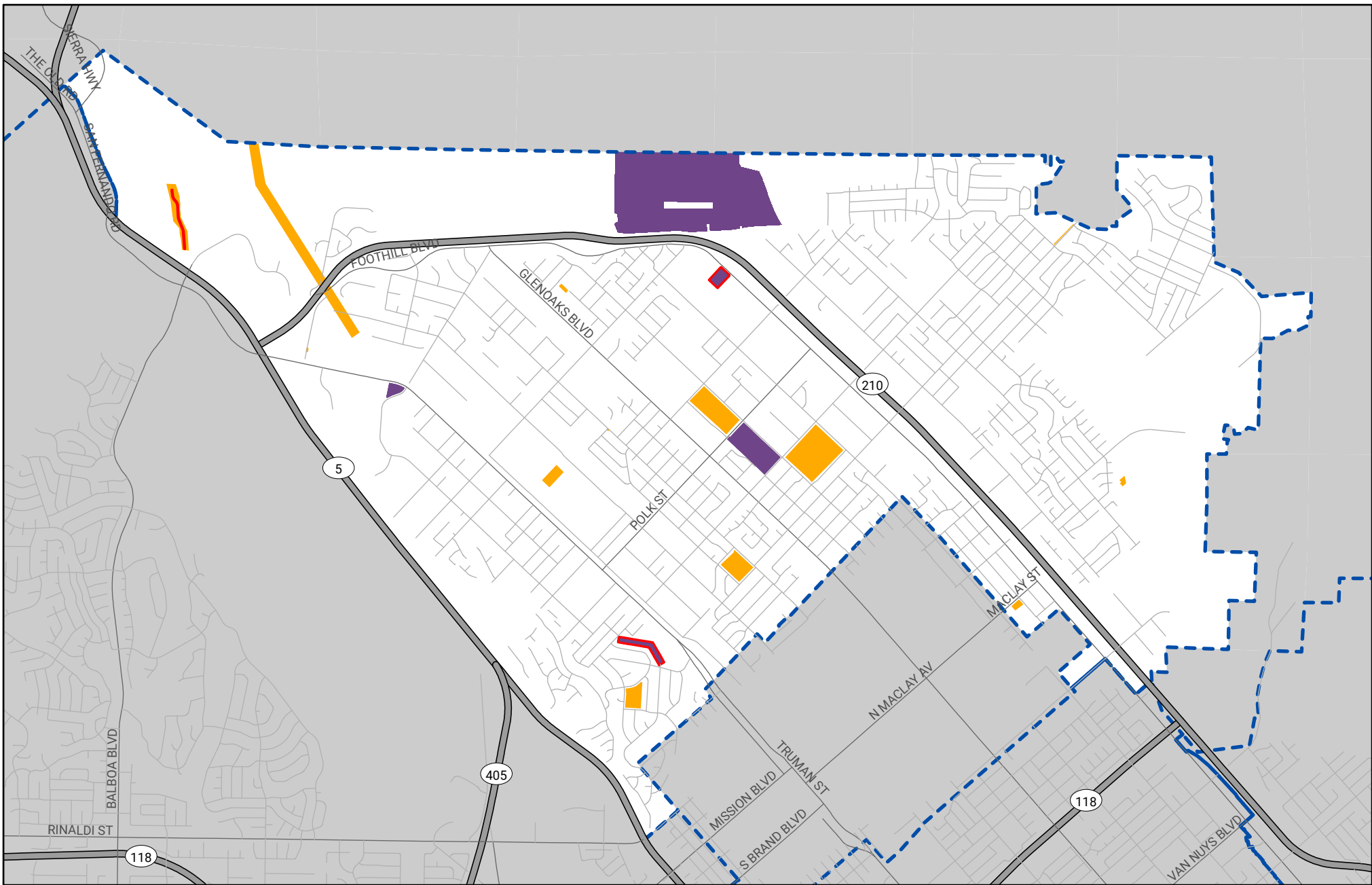
- Legend**
- CPA Boundary
  - HCM Demolished
  - Designated Resources
  - HPOZ
  - HCM
  - Eligible Resources





- Legend**
- CPA Boundary
  - HCM Demolished
  - Designated Resources
  - HPOZ
  - HCM
  - Eligible Resources



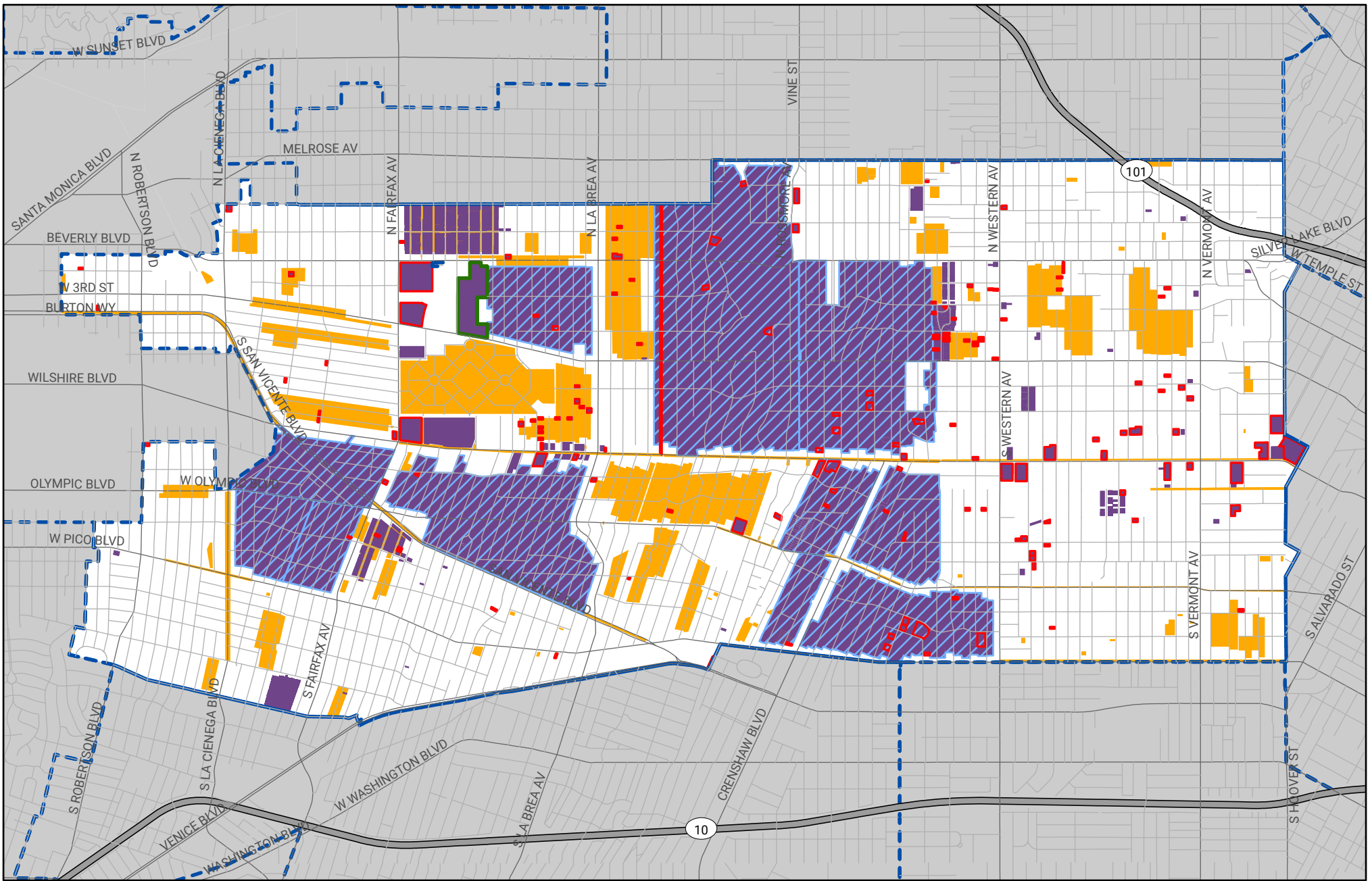


- Legend**
- CPA Boundary
  - HCM Demolished
  - Designated Resources
  - HPOZ
  - HCM
  - Eligible Resources



**Sylmar - Community Plan Area**  
City of Los Angeles

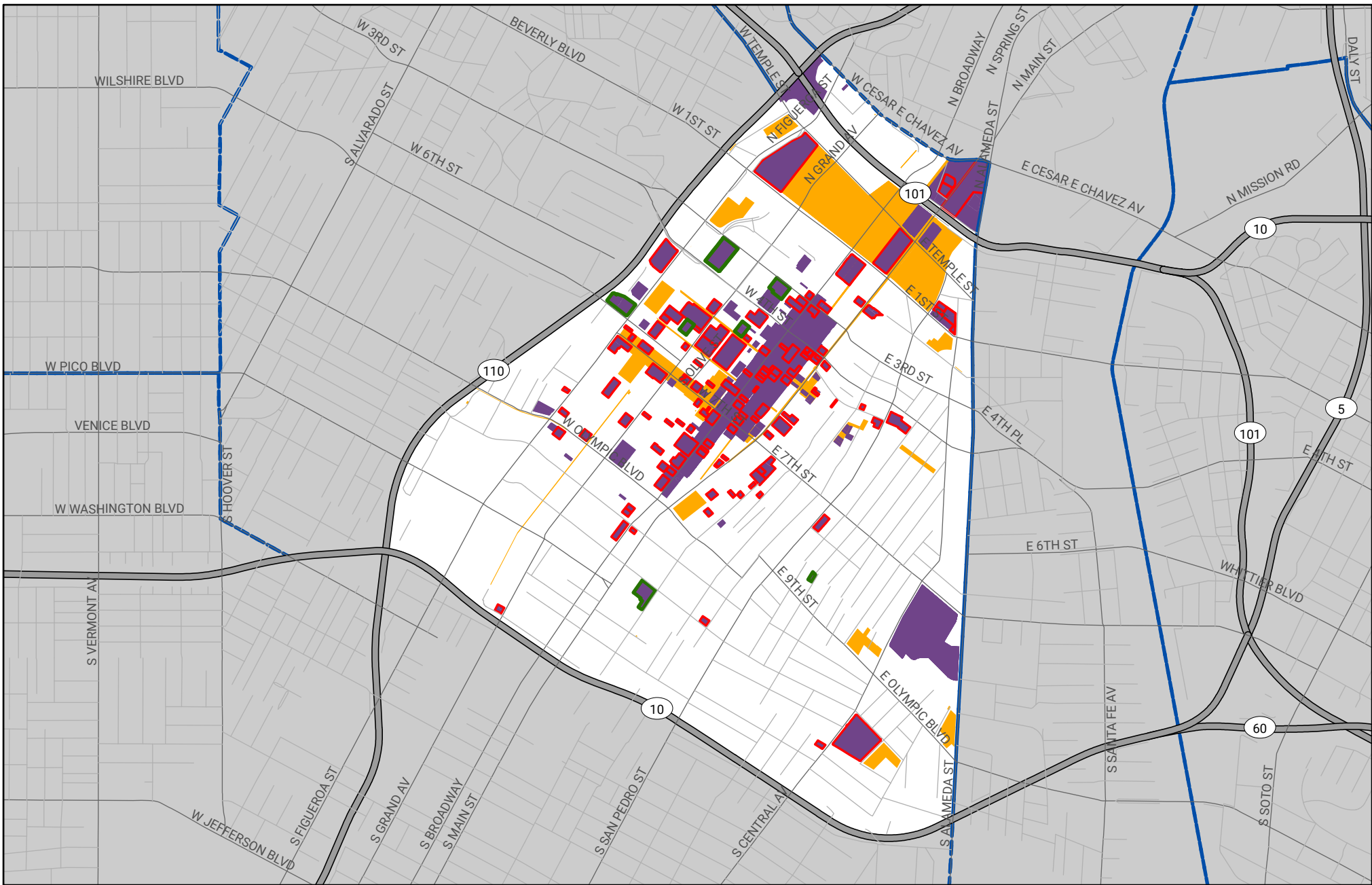




- Legend**
- CPA Boundary
  - HCM Demolished
  - Designated Resources
  - HPOZ
  - HCM
  - Eligible Resources

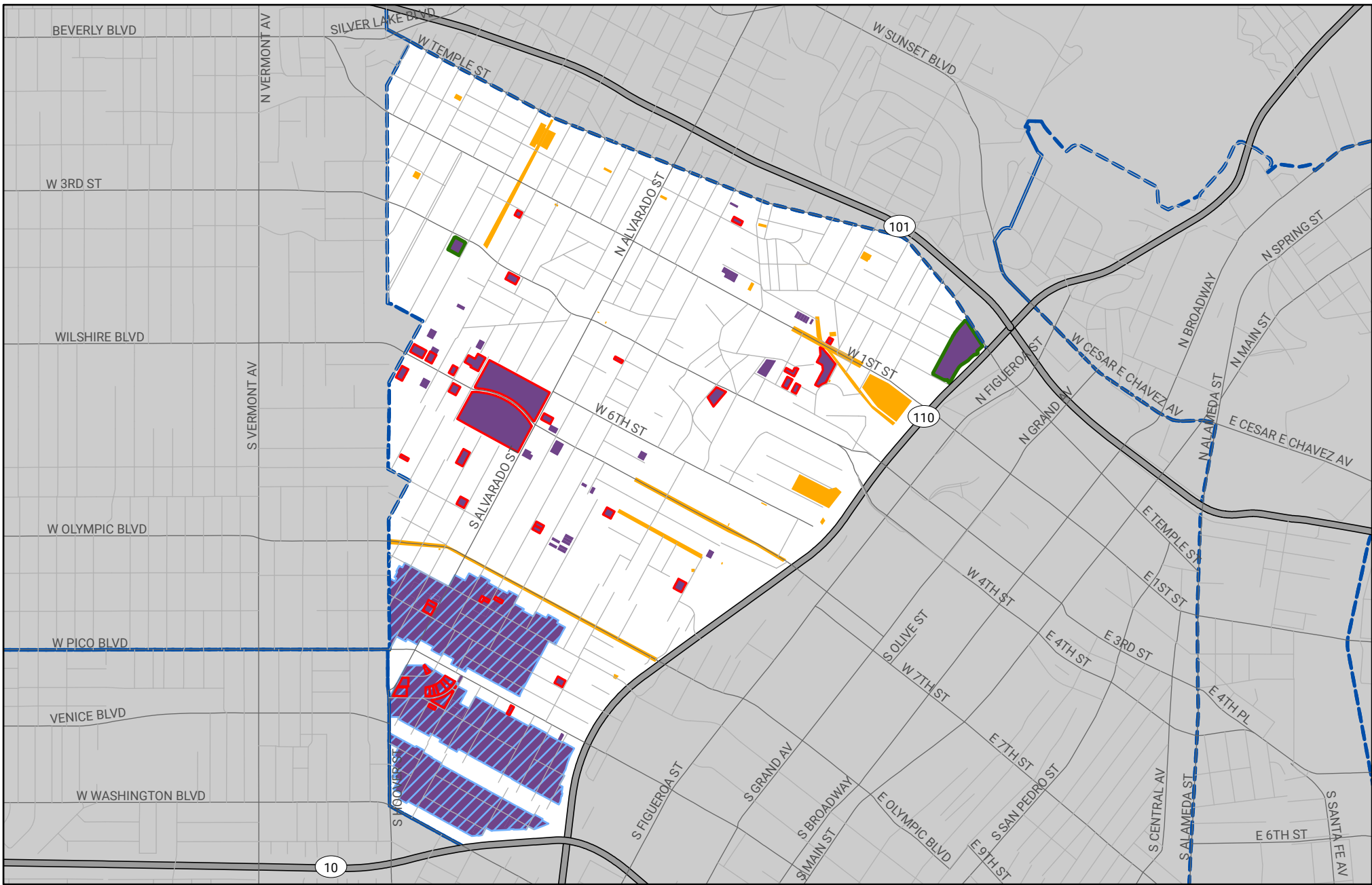






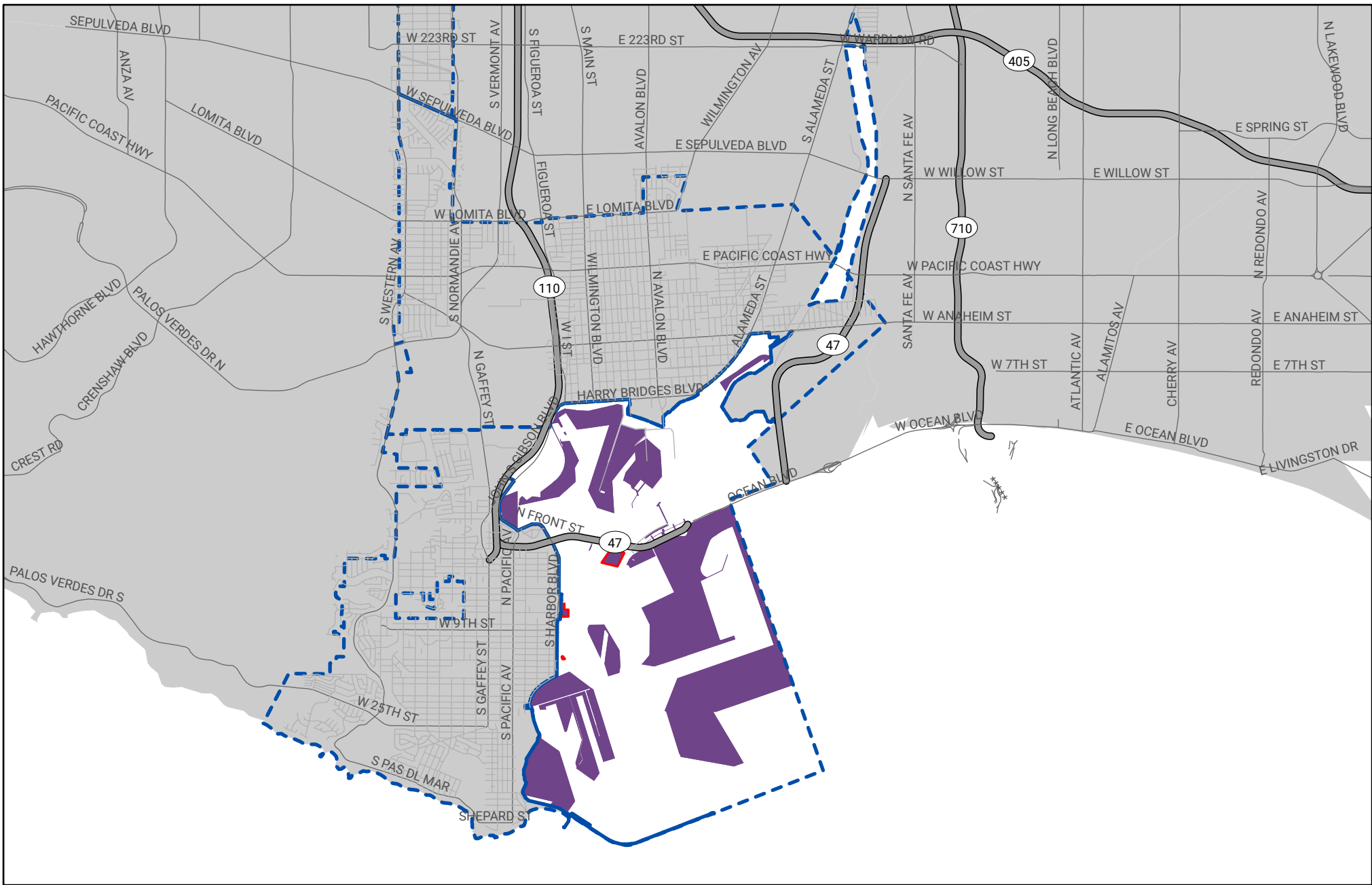
- Legend**
- CPA Boundary
  - HCM Demolished
  - Designated Resources
  - HPOZ
  - HCM
  - Eligible Resources











- Legend**
- CPA Boundary
  - HCM Demolished
  - Designated Resources
  - HPOZ
  - HCM
  - Eligible Resources



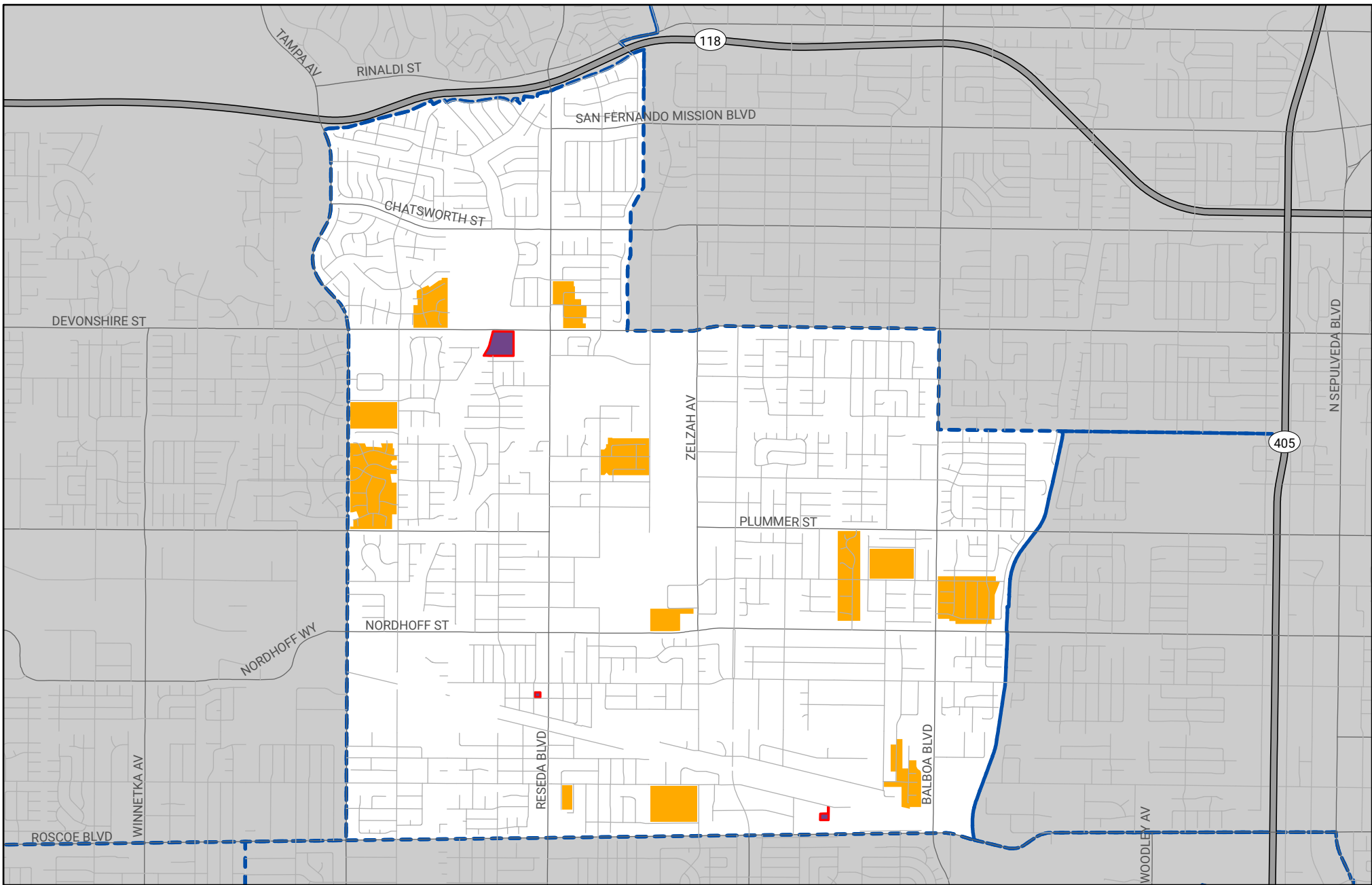


- Legend**
-  CPA Boundary
  -  HCM Demolished
  -  Designated Resources
  -  HPOZ
  -  HCM
  -  Eligible Resources



**Port of Los Angeles - Community Plan Area**  
City of Los Angeles





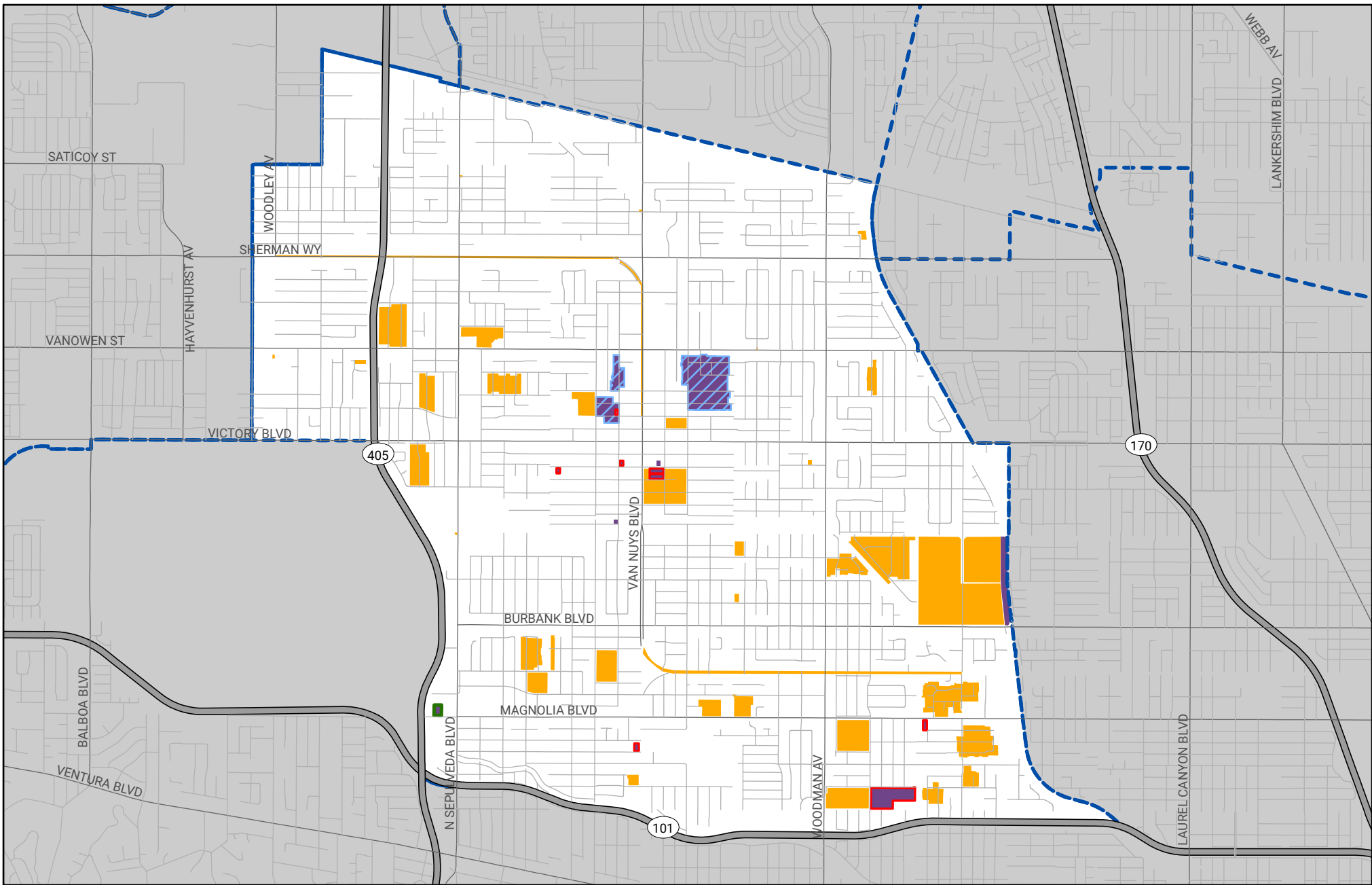
**Legend**

- CPA Boundary
- HCM Demolished
- Designated Resources
- HPOZ
- HCM
- Eligible Resources



**Northridge - Community Plan Area**  
City of Los Angeles





**Legend**

- CPA Boundary
- HCM Demolished
- Designated Resources
- HPOZ
- HCM
- Eligible Resources



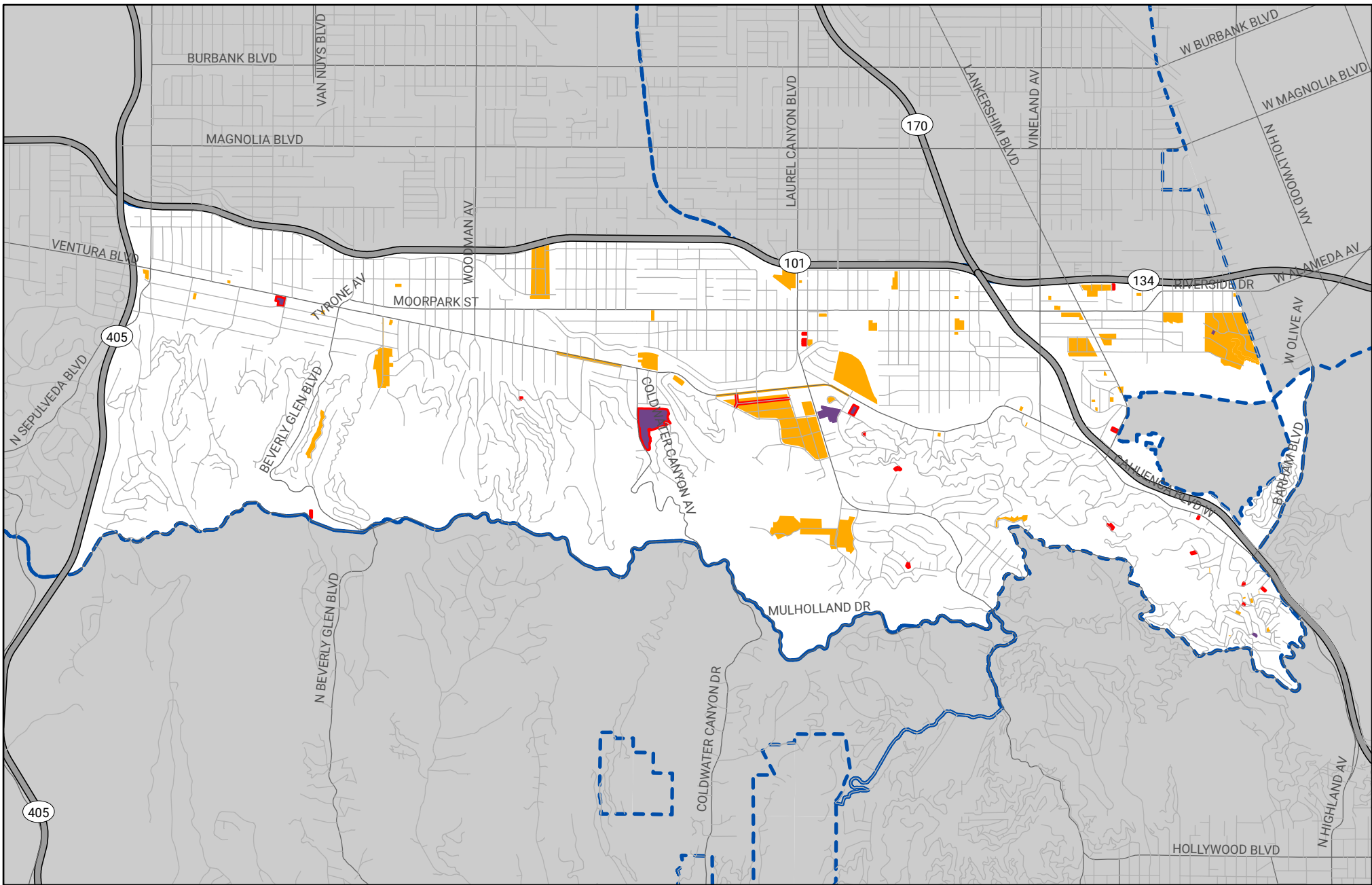
**Van Nuys - North Sherman Oaks - Community Plan Area**  
 City of Los Angeles





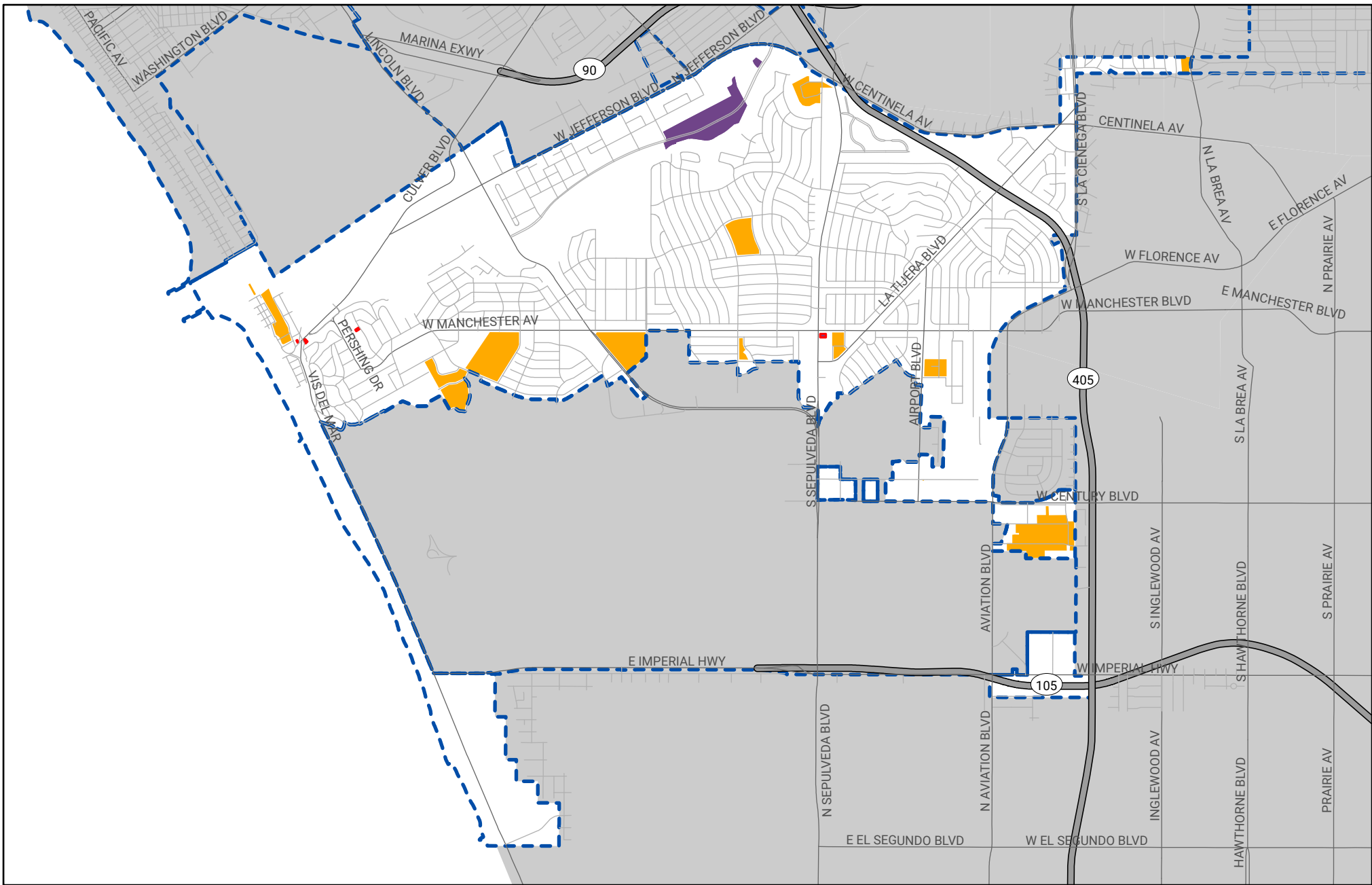
- Legend**
- CPA Boundary
  - HCM Demolished
  - Designated Resources
  - HPOZ
  - HCM
  - Eligible Resources





- Legend**
- CPA Boundary
  - HCM Demolished
  - Designated Resources
  - HPOZ
  - HCM
  - Eligible Resources

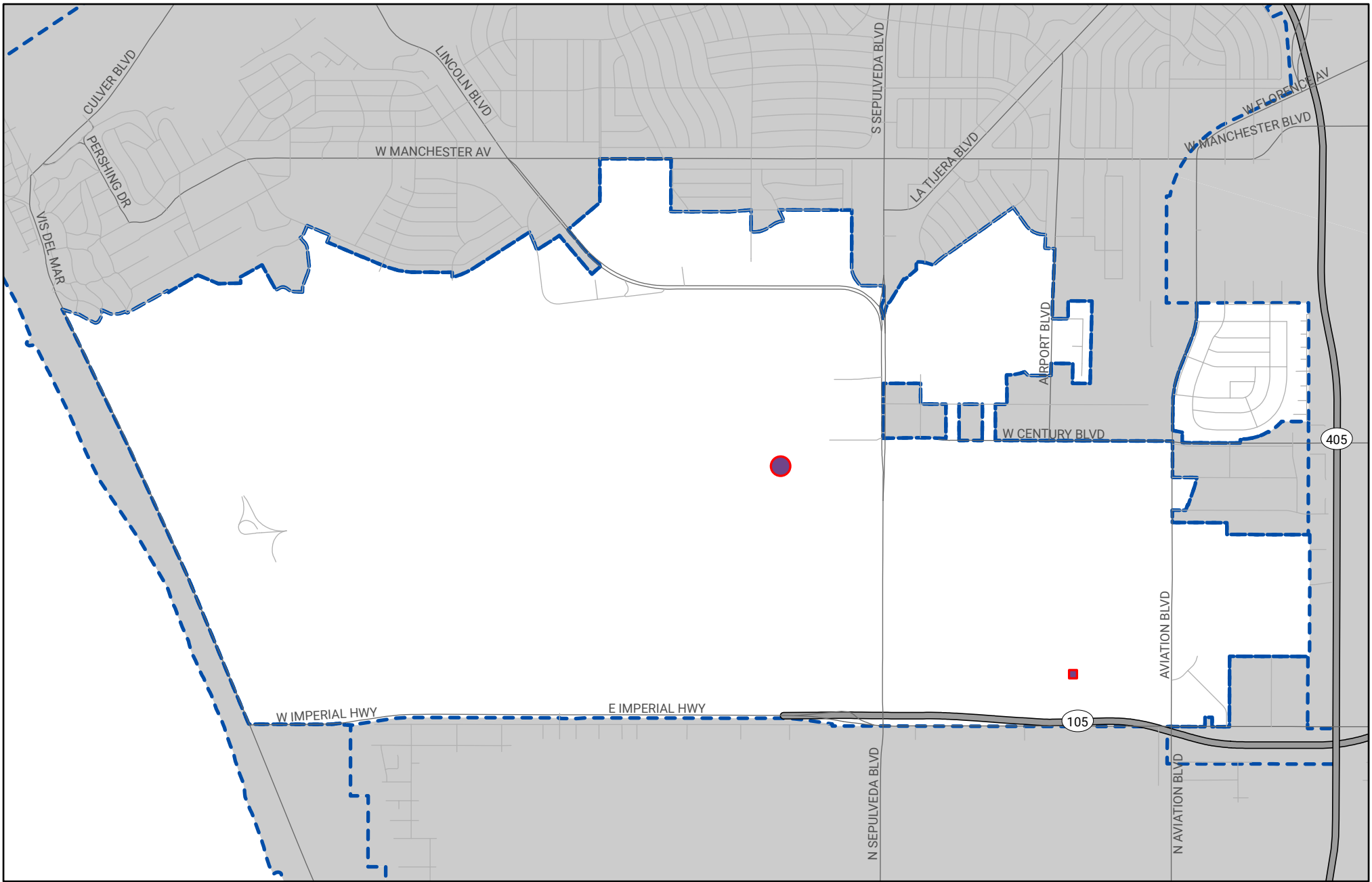




- Legend**
- CPA Boundary
  - HCM Demolished
  - Designated Resources
  - HPOZ
  - HCM
  - Eligible Resources

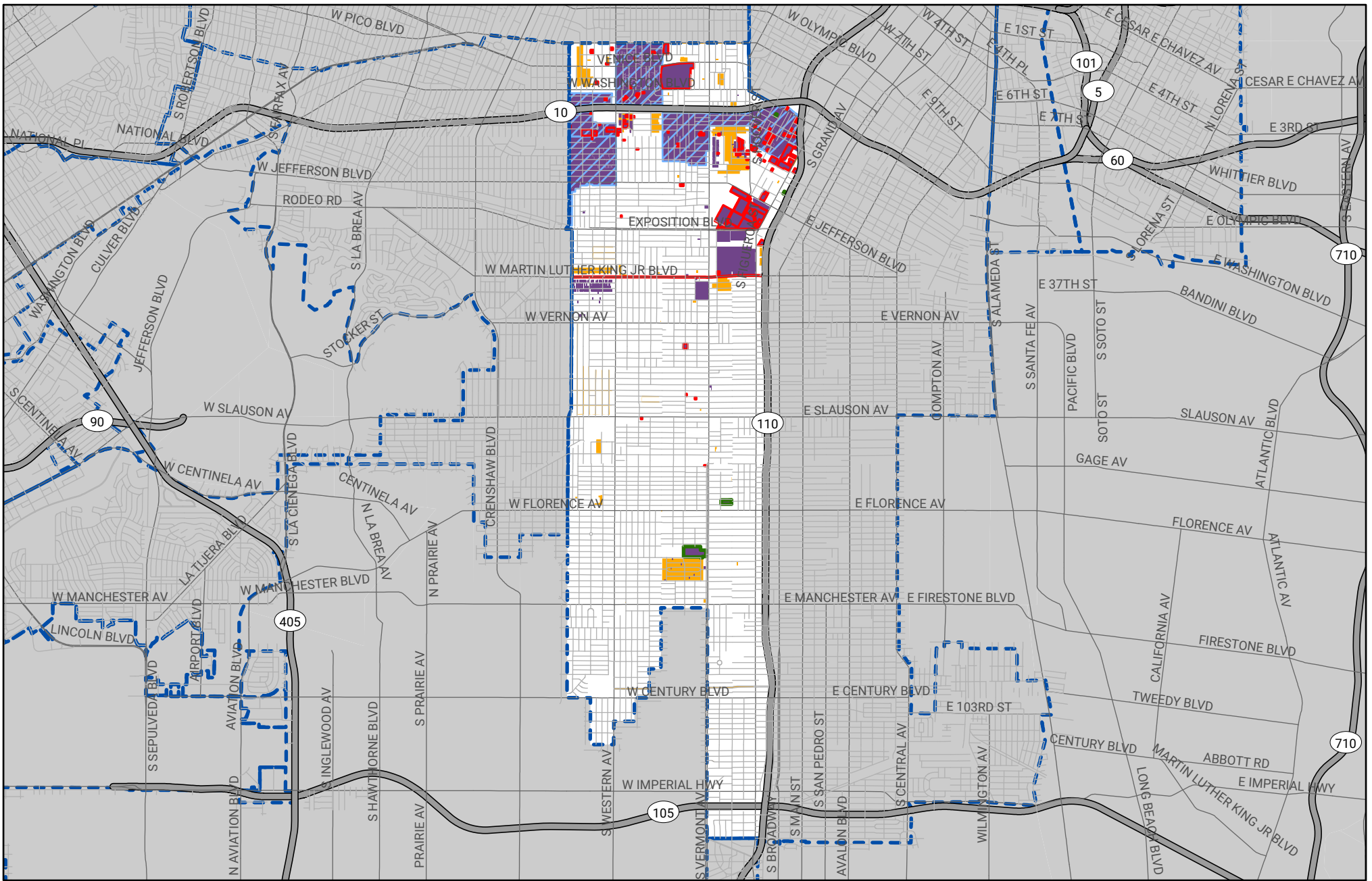






- Legend**
- CPA Boundary
  - HCM Demolished
  - Designated Resources
  - HPOZ
  - HCM
  - Eligible Resources



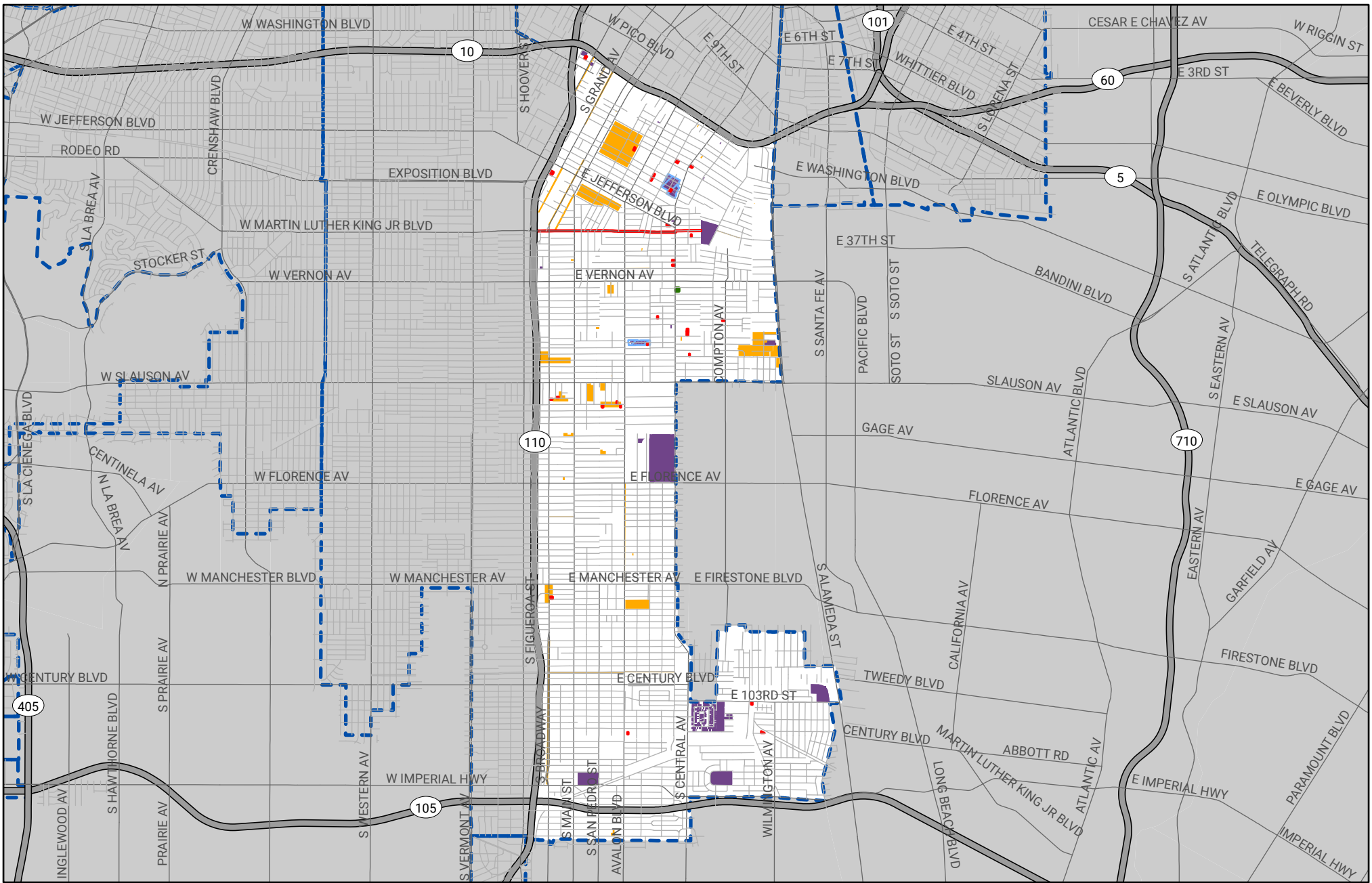


- Legend**
- CPA Boundary
  - HCM Demolished
  - Designated Resources
  - HPOZ
  - HCM
  - Eligible Resources



**South Los Angeles - Community Plan Area**  
City of Los Angeles





- Legend**
- CPA Boundary
  - HCM Demolished
  - Designated Resources
  - HCM
  - Eligible Resources
  - HPOZ



**Southeast Los Angeles - Community Plan Area**  
City of Los Angeles



# Appendix G

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Los Angeles Police Department Statistics

# LAPD Low Priority Calls Response Times

April 04, 2021 to April 10, 2021  
 Low Priority Calls Response Times  
 Citywide Totals

Bureau	Division	Area	Total Calls	Median Dispatch Time Minutes	Average Dispatch Times Year-to-Date	Median Unit Response Time	Average Unit Response Times Year-to-date	Median Citizen Response Time	Average Citizen Response Times Year-todate
Central Bureau	Central	1	324	13.9	14.0	23.1	21.9	45.2	45.6
	Rampart	2	330	19.8	15.7	31.5	27.3	59.4	53.7
	Hollenbeck	4	253	9.0	9.2	32.0	29.4	49.9	46.6
	Newton	13	300	14.3	15.0	30.1	33.8	55.1	59.9
	Northeast	11	276	10.4	10.4	28.9	31.3	47.5	51.0
				<b>1483</b>	<b>13.3</b>	<b>12.7</b>	<b>28.4</b>	<b>28.3</b>	<b>51.1</b>
West Bureau	Hollywood	6	404	11.2	12.0	30.7	29.6	53.6	52.6
	Wilshire	7	357	10.3	10.6	31.3	29.3	52.0	50.8
	West L.A.	8	367	7.2	7.1	20.3	25.0	36.4	39.0
	Pacific	14	393	9.8	10.6	31.4	28.3	47.5	49.3
	Olympic	20	306	13.3	12.7	25.6	26.1	51.0	47.5
			<b>1827</b>	<b>10.3</b>	<b>10.2</b>	<b>27.2</b>	<b>27.4</b>	<b>47.3</b>	<b>47.5</b>
South Bureau	77th	12	374	16.8	18.9	35.9	40.4	66.1	73.4
	Southeast	18	247	14.9	17.5	39.2	39.6	60.6	68.9
	Southwest	3	324	10.7	11.9	26.2	28.3	43.7	51.0
	Harbor	5	288	6.5	7.6	22.5	23.1	35.5	37.5
			<b>1233</b>	<b>11.5</b>	<b>13.4</b>	<b>30.2</b>	<b>31.3</b>	<b>49.5</b>	<b>55.9</b>
Valley Bureau	Van Nuys	9	286	19.2	12.2	29.0	26.0	64.0	49.1
	West Valley	10	272	8.4	8.6	27.8	26.4	46.6	43.5
	Foothill	16	223	6.6	6.5	22.7	27.7	35.8	41.1
	Devonshire	17	279	14.1	10.1	28.5	24.0	49.3	41.5
	Mission	19	263	13.5	12.0	32.5	31.2	64.8	53.2
	North Hollywood	15	383	15.1	12.9	24.6	30.9	52.4	55.3
	Topanga	21	266	9.8	11.2	29.0	27.1	44.5	48.0
			<b>1972</b>	<b>12.1</b>	<b>10.5</b>	<b>27.8</b>	<b>27.2</b>	<b>50.0</b>	<b>46.9</b>
<b>Citywide Totals</b>			<b>6515</b>	<b>11.7</b>	<b>11.3</b>	<b>28.2</b>	<b>28.2</b>	<b>49.1</b>	<b>49.4</b>

# LAPD Code 2 Response Times

April 04, 2021 to April 10, 2021  
Code 2 Response Times  
Citywide Totals

Bureau	Division	Area	Total Calls	Median Dispatch Time Minutes	Average Dispatch Times Year-to-Date	Median Unit Response Time	Average Unit Response Times Year-to-date	Median Citizen Response Time	Average Citizen Response Times Year-todate
Central Bureau	Central	1	418	4.9	4.4	10.0	9.6	18.5	17.0
	Rampart	2	383	5.2	4.7	11.6	11.2	19.0	19.0
	Hollenbeck	4	303	4.1	3.3	14.6	15.5	21.6	22.0
	Newton	13	410	3.8	4.4	17.4	16.0	25.8	25.0
	Northeast	11	326	3.1	3.4	16.9	17.0	23.7	24.1
				<b>1840</b>	<b>4.1</b>	<b>4.0</b>	<b>13.8</b>	<b>13.3</b>	<b>21.6</b>
West Bureau	Hollywood	6	351	4.2	4.4	11.5	11.2	17.7	19.0
	Wilshire	7	265	3.1	3.2	13.2	12.5	18.8	18.3
	West L.A.	8	244	2.5	2.8	12.5	12.9	17.3	17.8
	Pacific	14	308	2.7	2.9	13.2	14.1	20.9	20.8
	Olympic	20	315	4.2	4.1	10.7	11.3	19.2	18.4
			<b>1483</b>	<b>3.4</b>	<b>3.4</b>	<b>12.2</b>	<b>12.4</b>	<b>18.7</b>	<b>18.8</b>
South Bureau	77th	12	471	5.3	5.1	15.1	14.2	22.1	22.9
	Southeast	18	356	3.3	3.7	17.4	16.9	25.0	25.6
	Southwest	3	328	3.1	3.7	12.1	12.3	18.9	19.3
	Harbor	5	303	2.3	2.5	12.6	12.6	18.1	17.9
			<b>1458</b>	<b>3.4</b>	<b>3.8</b>	<b>14.4</b>	<b>13.9</b>	<b>21.1</b>	<b>21.5</b>
Valley Bureau	Van Nuys	9	296	5.2	3.9	11.8	11.3	20.3	18.3
	West Valley	10	234	3.0	2.7	13.1	13.3	17.2	18.3
	Foothill	16	234	2.1	2.3	10.6	12.9	15.3	17.5
	Devonshire	17	246	4.3	3.5	17.0	13.9	26.2	20.1
	Mission	19	323	4.7	4.3	14.0	14.6	21.6	22.0
	North Hollywood	15	318	3.5	3.5	12.5	13.0	18.7	19.6
	Topanga	21	273	2.8	3.9	13.7	13.3	19.7	20.4
			<b>1924</b>	<b>3.5</b>	<b>3.3</b>	<b>13.3</b>	<b>13.2</b>	<b>19.7</b>	<b>19.4</b>
<b>Citywide Totals</b>			<b>6705</b>	<b>3.6</b>	<b>3.6</b>	<b>13.4</b>	<b>13.2</b>	<b>20.3</b>	<b>20.1</b>

# LAPD Code 3 Response Times

April 04, 2021 to April 10, 2021  
Code 3 Response Times  
Citywide Totals

Bureau	Division	Area	Total Calls	Median Dispatch Time Minutes	Average Dispatch Times Year-to-Date	Median Unit Response Time	Average Unit Response Times Year-to-date	Median Citizen Response Time	Average Citizen Response Times Year-todate
Central Bureau	Central	1	121	1.6	1.6	3.1	2.9	4.9	4.6
	Rampart	2	111	1.7	1.5	3.5	3.4	5.2	4.9
	Hollenbeck	4	88	1.2	1.3	5.3	5.0	6.5	6.6
	Newton	13	125	1.5	1.6	5.4	4.7	7.0	6.4
	Northeast	11	64	1.5	1.4	6.9	6.2	8.2	7.7
				<b>509</b>	<b>1.5</b>	<b>1.5</b>	<b>4.3</b>	<b>4.1</b>	<b>6.0</b>
West Bureau	Hollywood	6	121	1.3	1.4	2.9	3.4	4.4	4.9
	Wilshire	7	78	1.4	1.3	3.3	3.8	5.1	5.3
	West L.A.	8	76	1.4	1.3	6.0	5.4	7.6	6.9
	Pacific	14	78	1.3	1.4	5.2	5.1	6.5	6.4
	Olympic	20	102	1.4	1.4	3.5	3.3	5.3	4.9
			<b>455</b>	<b>1.4</b>	<b>1.4</b>	<b>3.9</b>	<b>4.0</b>	<b>5.4</b>	<b>5.5</b>
South Bureau	77th	12	162	1.5	1.5	3.7	4.2	5.3	5.9
	Southeast	18	120	1.5	1.5	5.0	4.4	6.8	6.0
	Southwest	3	108	1.5	1.5	3.9	3.7	5.6	5.4
	Harbor	5	81	1.2	1.2	5.4	4.7	6.7	6.1
			<b>471</b>	<b>1.4</b>	<b>1.4</b>	<b>4.3</b>	<b>4.2</b>	<b>5.8</b>	<b>5.8</b>
Valley Bureau	Van Nuys	9	63	1.6	1.4	4.5	3.7	6.0	5.3
	West Valley	10	63	1.3	1.3	4.3	4.6	5.7	6.0
	Foothill	16	72	1.3	1.2	4.6	4.9	5.8	6.1
	Devonshire	17	57	1.5	1.4	6.4	5.5	7.5	7.0
	Mission	19	89	1.4	1.4	4.3	5.1	5.8	6.6
	North Hollywood	15	91	1.3	1.4	4.8	4.4	6.3	5.9
	Topanga	21	57	1.7	1.4	4.7	4.6	6.7	6.2
			<b>492</b>	<b>1.4</b>	<b>1.4</b>	<b>4.8</b>	<b>4.7</b>	<b>6.3</b>	<b>6.1</b>
<b>Citywide Totals</b>			<b>1927</b>	<b>1.4</b>	<b>1.4</b>	<b>4.3</b>	<b>4.3</b>	<b>6.0</b>	<b>5.8</b>

**Sworn/Civilian Counts**  
**by**  
**Geographical Areas**  
**As of 04/07/2021**

**SWORN CIVILIAN TOTAL**

<b>BUREAU</b>	<b>AREA</b>			
CB	CENT	385	18	<b>403</b>
	HOBK	260	13	<b>273</b>
	NE	268	12	<b>280</b>
	NEWT	315	17	<b>332</b>
	RAMP	289	14	<b>303</b>
<b>*TOTAL CB</b>		<b>1517</b>	<b>74</b>	<b>1591</b>
<hr/>				
SB	77TH	369	18	<b>387</b>
	HARB	265	20	<b>285</b>
	SBHD	67	3	<b>70</b>
	SE	327	14	<b>341</b>
	SW	348	16	<b>364</b>
<b>*TOTAL SB</b>		<b>1376</b>	<b>71</b>	<b>1447</b>
<hr/>				
VB	DEV	241	13	<b>254</b>
	FTHL	250	16	<b>266</b>
	MISN	271	17	<b>288</b>
	NHWD	264	14	<b>278</b>
	TOP	249	16	<b>265</b>
	VNY	242	15	<b>257</b>
	WVAL	249	14	<b>263</b>
<b>*TOTAL VB</b>		<b>1766</b>	<b>105</b>	<b>1871</b>
<hr/>				
WB	HWD	348	15	<b>363</b>
	OLYM	268	13	<b>281</b>
	PAC	299	15	<b>314</b>
	PAC-LAX	38	1	<b>39</b>
	WIL	257	10	<b>267</b>
	WLA	224	11	<b>235</b>
<b>*TOTAL WB</b>		<b>1434</b>	<b>65</b>	<b>1499</b>

Prepared by ADSD ESS on 04/07/21  
 ref:Adhoc/chris\_count\_dept\_by\_area





# Appendix H

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Native American Consultation Letters



Cally Hardy &lt;cally.hardy@lacity.org&gt;

## housing element 20212-2029 update city of Los Angeles CA

4 messages

**Gabrieleno Administration** <admin@gabrielenoindians.org>  
To: cally.hardy@lacity.org

Wed, Nov 25, 2020 at 2:03 PM

Hello Cally Hardy

Thank you for your letter dated November 12,2020. Will there be any type of ground disturbance taking place regarding the above project?

Thank you

Sincerely,

Brandy Salas  
Admin Specialist  
Gabrieleno Band of Mission Indians - Kizh Nation  
PO Box 393  
Covina, CA 91723  
Office: 844-390-0787  
website: [www.gabrielenoindians.org](http://www.gabrielenoindians.org)



*The region where Gabrieleño culture thrived for more than eight centuries encompassed most of Los Angeles County, more than half of Orange County and portions of Riverside and San Bernardino counties. It was the labor of the Gabrieleño who built the missions, ranchos and the pueblos of Los Angeles. They were trained in the trades, and they did the construction and maintenance, as well as the farming and managing of herds of livestock. "The Gabrieleño are the ones who did all this work, and they really are the foundation of the early economy of the Los Angeles area ". "That's a contribution that Los Angeles has not recognized--the fact that in its early decades, without the Gabrieleño, the community simply would not have survived."*

**Cally Hardy** <cally.hardy@lacity.org>  
To: Gabrieleno Administration <admin@gabrielenoindians.org>

Tue, Dec 1, 2020 at 10:25 AM

Thank you for your email.

The proposed project involves an update to the Housing Element of the City of Los Angeles General Plan. The proposed Housing Element Update establishes programs, policies and actions to generally further the goal of meeting the existing and projected housing needs of all family income levels of the City, and to accommodate the Regional Housing Needs Assessment (RHNA) allocation through the year 2029, as established by the Southern California Association of Governments (SCAG).

Under Housing Element law, the City must show that it has adequate land zoned to accommodate the entirety of its 2021-2029 Regional Housing Needs Assessment (RHNA) allocation of 455,577 units. The Project is required to demonstrate the zoned capacity needed to accommodate the development of the RHNA Allocation using various land use planning strategies. The City provides capacity for housing through local zoning regulations. The City, however, is not required to physically construct 455,577 units as a result of the RHNA allocation. The project will not directly result in physical construction of housing units, or any ground disturbing activities.

Please let me know if you have any additional questions.

Regards,  
Cally

[Quoted text hidden]

--



LOS ANGELES  
CITY PLANNING

**Cally Hardy** (she/her/hers)  
City Planning Associate  
**Los Angeles City Planning**

200 N. Spring St., Room 750  
Los Angeles, CA 90012  
Planning4LA.org  
(213) 978-1643



**Gabrieleno Administration** <admin@gabrielenoindians.org>  
To: Cally Hardy <cally.hardy@lacity.org>

Thu, Feb 18, 2021 at 12:28 PM

Thank you Cally if there will not be any type of ground disturbance taking place there will be no need for a consultation.

Thank you

Admin Specialist  
Gabrieleno Band of Mission Indians - Kizh Nation  
PO Box 393  
Covina, CA 91723  
Office: 844-390-0787  
website: [www.gabrielenoindians.org](http://www.gabrielenoindians.org)



*The region where Gabrieleño culture thrived for more than eight centuries encompassed most of Los Angeles County, more than half of Orange County and portions of Riverside and San Bernardino counties. It was the labor of the Gabrieleño who built the missions, ranchos and the pueblos of Los Angeles. They were trained in the trades, and they did the construction and maintenance, as well as the farming and managing of herds of livestock. "The Gabrieleño are the ones who did all this work, and they really are the foundation of the early economy of the Los Angeles area ". "That's a contribution that Los Angeles has not recognized--the fact that in its early decades, without the Gabrieleño, the community simply would not have survived."*

[Quoted text hidden]

**Cally Hardy** <cally.hardy@lacity.org>  
To: Gabrieleno Administration <admin@gabrielenoindians.org>

Mon, Feb 22, 2021 at 6:07 PM

Thank you for your email, and for providing this confirmation.

Regards,

2/22/2021

City of Los Angeles Mail - housing element 20212-2029 update city of Los Angeles CA

Cally

[Quoted text hidden]



Cally Hardy &lt;cally.hardy@lacity.org&gt;

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## AB 52 / SB18 Tribal Consultation Notice - Housing Element Update (CPC-2020-1365-GPA; ENV-2020-6762-EIR)

---

Jairo Avila &lt;jairo.avila@tataviam-nsn.us&gt;

Tue, Dec 15, 2020 at 11:38 AM

To: Cally Hardy &lt;cally.hardy@lacity.org&gt;

Hello Cally,

The Cultural Resource Management (CRM) Division of the Fernandeano Tataviam Band of Mission Indians (FTBMI), appreciates the opportunity to consult under SB18 and AB52 for the proposed Housing Element Update (CPC-2020-1365-GPA; ENV-2020-6762-EIR) (Project) on December 1, 2020. The Project will establish guidelines and protocols for future development throughout the City of Los Angeles, which has the potential to impact significant Tribal Cultural Resources during construction. The CRM Division understands that the Project does not propose any construction. However, it is important that standard conditions and mitigation measures be updated to address the concerns of Tribes that are traditionally and culturally affiliated with the Project area. At this time, the CRM Division would like the following actions or similar objectives to be addressed and included within the Cultural Resource and Tribal Cultural Resource sections of the Environmental Impact Report (EIR).

### Actions:

- All cultural resource and tribal cultural resource assessment reports prepared shall include a record search with a study area of no less than 0.5 miles around the project area. Projects conducted in culturally and historically sensitive areas should include a record search with a study area of no less than 1 mile around the project area.
- Should projects have potential to impact cultural resources, as determined during the environmental assessment or Tribal consultation, a Cultural Resources Monitoring Program (CRMP) shall be prepared, in consultation with all interested Tribes consulting under AB52, prior to the commencement of any and all ground-disturbing activities for the Project, including any archaeological testing. The CRMP will provide details regarding the process for in-field treatment of inadvertent discoveries and the disposition of inadvertently discovered non-funerary resources.
- In the event that Tribal Cultural Resources are discovered during Project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and a qualified archaeologist meeting Secretary of Interior standards shall assess the find.
- Tribes that culturally and historically affiliate to the Project area and requested consultation shall be notified should any findings be discovered during project implementation.
- Unless agreed upon during the Tribal Consultation process, consulting Tribes shall be given the opportunity to request that a Native monitor be retained by the applicant for the remainder of ground disturbing activities should Tribal Cultural Resources be encountered during project implementation.
- Any and all archaeological/cultural documents created as a part of the Project (isolate records, site records, survey reports, testing reports, and monitoring reports) should be provided to consulting Tribes consulting.
- The Lead Agency and/or applicant shall, in good faith, provide all consulting Tribes the opportunity to consult on the disposition and treatment of resources.

The CRM Division looks forward to reviewing the Cultural Resources and Tribal Cultural Resource section of the Draft EIR to provide additional comments prior to concluding AB52 Consultation.

Should you have any questions regarding this email, please let me know. I appreciate your time and look forward to further updates on this Project.

Respectfully,

**Jairo F. Avila, M.A., RPA.**

*Tribal Historic and Cultural Preservation Officer*

Cultural Resources Management Division

**Tribal Historic and Cultural Preservation Department**

**Fernandeño Tataviam Band of Mission Indians**

1019 Second Street, Suite 1

San Fernando, California 91340

Office: (818) 837-0794

Website: <http://www.tataviam-nsn.us>

---

**From:** Cally Hardy <[cally.hardy@lacity.org](mailto:cally.hardy@lacity.org)>

**Sent:** Monday, November 16, 2020 1:26 PM

[Quoted text hidden]

[Quoted text hidden]



Cally Hardy <cally.hardy@lacity.org>

**AB 52 / SB18 Tribal Consultation Notice - Housing Element Update (CPC-2020-1365-GPA; ENV-2020-6762-EIR)**

**Cally Hardy** <cally.hardy@lacity.org>  
To: jairo.avila@tataviam-nsn.us

Thu, Nov 12, 2020 at 11:48 AM

Dear Tribal Representative,

Please see the attached consultation notice which was sent via mail on Thursday, November 12, 2020.

Regards,  
Cally

--



**Cally Hardy** (she/her/hers)  
City Planning Associate  
**Los Angeles City Planning**  
200 N. Spring St., Room 750  
Los Angeles, CA 90012  
Planning4LA.org  
(213) 978-1643



**SB18-AB52 Combined Letter\_Avila.pdf**  
97K



**DEPARTMENT OF  
CITY PLANNING**

COMMISSION OFFICE  
(213) 978-1300

CITY PLANNING COMMISSION

SAMANTHA MILLMAN  
PRESIDENT

VAHID KHORSAND  
VICE-PRESIDENT

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DANA M. PERLMAN

**CITY OF LOS ANGELES  
CALIFORNIA**



ERIC GARCETTI  
MAYOR

**EXECUTIVE OFFICES**  
200 N. SPRING STREET, ROOM 525  
LOS ANGELES, CA 90012-4801  
(213) 978-1271

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DEPUTY DIRECTOR

ARTHI L. VARMA, AICP  
DEPUTY DIRECTOR

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DEPUTY DIRECTOR

VACANT  
DEPUTY DIRECTOR

**AB 52 / SB 18 TRIBAL CONSULTATION NOTICE**

November 12, 2020

Fernandeño Tataviam Band of Mission Indians  
Jairo Avila, Tribal Historic and Cultural Preservation Officer  
1019 Second Street, Ste. 1  
San Fernando, CA 91340  
Phone: (818) 837-0794

Also delivered via email to: [jairo.avila@tataviam-nsn.us](mailto:jairo.avila@tataviam-nsn.us)

RE: Assembly Bill 52 and Senate Bill 18 Consultation  
Los Angeles Housing Element 2021-2029 Update, City of Los Angeles, California  
CASE Nos.: CPC-2020-1365-GPA; ENV-2020-6762-EIR

Dear Tribal Representative:

This letter is to inform you that the Los Angeles Department of City Planning is preparing an Environmental Impact Report (EIR) for the proposed Los Angeles Citywide Housing Element 2021-2029 Update (hereafter referred to as "proposed project" or "Housing Element"). The current Housing Element identifies the City's housing conditions and needs, establishes the goals, objectives, and policies that are the foundation of the City's housing strategy, and provides an array of programs to create sustainable, mixed-income neighborhoods across the City. The proposed project will include a comprehensive update to the current Housing Element and will identify sufficient sites to accommodate the City's fair share of the regional housing needs based on the Southern California Association of Government's (SCAG) Regional Housing Need Allocation (RHNA).

The proposed project must comply with California Public Resources Code § 21080.3.1 (Assembly Bill [AB] 52 of 2014), which requires local governments to conduct meaningful consultation with California Native American tribes that have requested to be notified by lead agencies of proposed projects in the geographic area with which the tribe is traditionally and culturally affiliated.

The proposed project includes an update to the Housing Element of the General Plan, and although not required as a charter city, the City is also offering consultation under California Public Resources Code § 65352.3 – 65352.4 (Senate Bill 18).

## **PROJECT LOCATION**

The Proposed Project is an amendment to the General Plan that would apply citywide to all parcels located within the City of Los Angeles.

## **DEADLINE TO REQUEST CONSULTATION:**

Your tribe's input is important to the City's planning process. We request that you advise us as early as possible if you wish to consult on the proposed project. Under AB 52, you have 30 days and under the provisions of SB 18, have 90 days from the date of receipt of this notice to advise the City in writing if you are interested in further consultation. In your request, please provide any updated contact information for your tribe's representative. Please submit your tribe's request via mail and email to:

Los Angeles Department of City Planning  
Attn: Cally Hardy  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012  
Email: [cally.hardy@lacity.org](mailto:cally.hardy@lacity.org)  
Phone No.: (213) 978-1643

If you have any questions, please contact us at your earliest opportunity.

Sincerely,

Vincent P. Bertoni, AICP  
Director of Planning

A handwritten signature in black ink, appearing to read 'Cally Hardy', with a long, sweeping horizontal stroke extending to the right.

Cally Hardy  
Citywide Policy Planning Division



Cally Hardy &lt;cally.hardy@lacity.org&gt;

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**AB 52 / SB18 Tribal Consultation Notice - Housing Element Update (CPC-2020-1365-GPA; ENV-2020-6762-EIR)**

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Jairo Avila &lt;jairo.avila@tataviam-nsn.us&gt;

Thu, Nov 12, 2020 at 12:19 PM

To: Cally Hardy &lt;cally.hardy@lacity.org&gt;

**Tribal Historic & Cultural Preservation Department****Project:** Housing Element Update (CPC-2020-1365-GPA; ENV-2020-6762-EIR)

Dear Cally Hardy,

On behalf of the Tribal Historic and Cultural Preservation (THCP) Department of the Fernand o Tataviam Band of Mission Indians (FTBMI), thank you for the formal notification regarding the Project referenced above. The Project area is located within the traditional FTBMI ancestral territory and encompasses the lineage-villages from which members of the Tribe descend. This message constitutes a formal request for tribal consultation under the California Environmental Quality Act (CEQA) (as amended, 2015) and CA Public Resources Code section 21080.3.1.

The THCP Department would like to know more about the update to the General Plan, and if these changes will cause impacts to tribal cultural resources. The THCP Department would like to schedule a call to discuss the Project. Is there a day within the next three weeks that works best for you? I appreciate your time and look forward to speaking with you soon.

Respectfully,

**Jairo F. Avila, M.A., RPA.***Tribal Historic and Cultural Preservation Officer*

Cultural Resources Management Division

**Tribal Historic and Cultural Preservation Department****Fernand o Tataviam Band of Mission Indians**

1019 Second Street, Suite 1

San Fernando, California 91340

Office: (818) 837-0794

Website: <http://www.tataviam-nsn.us>

---

**From:** Cally Hardy <cally.hardy@lacity.org>**Sent:** Thursday, November 12, 2020 11:48 AM**To:** Jairo Avila <jairo.avila@tataviam-nsn.us>**Subject:** AB 52 / SB18 Tribal Consultation Notice - Housing Element Update (CPC-2020-1365-GPA; ENV-2020-6762-EIR)**[CAUTION]** EXTERNAL Email. Exercise caution.

[Quoted text hidden]



Cally Hardy <cally.hardy@lacity.org>

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## AB 52 / SB18 Tribal Consultation Notice - Housing Element Update (CPC-2020-1365-GPA; ENV-2020-6762-EIR)

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Cally Hardy <cally.hardy@lacity.org>

Fri, Nov 13, 2020 at 4:22 PM

To: Jairo Avila <jairo.avila@tataviam-nsn.us>

Cc: Blair Smith <blair.smith@lacity.org>, Matthew Glesne <matthew.glesne@lacity.org>

Dear Jairo,

Thank you for your email. Are you available on the afternoon of Tuesday, December 1st, between 2:00-5:00 p.m. for a phone call?

Thank you,

Cally

[Quoted text hidden]



Cally Hardy &lt;cally.hardy@lacity.org&gt;

---

**AB 52 / SB18 Tribal Consultation Notice - Housing Element Update (CPC-2020-1365-GPA; ENV-2020-6762-EIR)**

---

Jairo Avila &lt;jairo.avila@tataviam-nsn.us&gt;

Fri, Nov 13, 2020 at 5:06 PM

To: Cally Hardy &lt;cally.hardy@lacity.org&gt;

Cc: Blair Smith &lt;blair.smith@lacity.org&gt;, Matthew Glesne &lt;matthew.glesne@lacity.org&gt;

Hello Cally,

Thank you for your response.

Tuesday December 1st at 2:00pm works perfect.

Can you provide me with a meeting invite or best number to reach you on this day?

Much appreciated,

**Jairo F. Avila, M.A., RPA.***Tribal Historic and Cultural Preservation Officer*

Cultural Resources Management Division

**Tribal Historic and Cultural Preservation Department****Fernandeño Tataviam Band of Mission Indians**

1019 Second Street, Suite 1

San Fernando, California 91340

Office: (818) 837-0794

Website: <http://www.tataviam-nsn.us>

---

**From:** Cally Hardy <cally.hardy@lacity.org>**Sent:** Friday, November 13, 2020 4:22 PM**To:** Jairo Avila <jairo.avila@tataviam-nsn.us>**Cc:** Blair Smith <blair.smith@lacity.org>; Matthew Glesne <matthew.glesne@lacity.org>**Subject:** Re: AB 52 / SB18 Tribal Consultation Notice - Housing Element Update (CPC-2020-1365-GPA; ENV-2020-6762-EIR)

[Quoted text hidden]



Cally Hardy <cally.hardy@lacity.org>

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**AB 52 / SB18 Tribal Consultation Notice - Housing Element Update (CPC-2020-1365-GPA; ENV-2020-6762-EIR)**

---

Cally Hardy <cally.hardy@lacity.org>

Mon, Nov 16, 2020 at 1:26 PM

To: Jairo Avila <jairo.avila@tataviam-nsn.us>

Cc: Blair Smith <blair.smith@lacity.org>, Matthew Glesne <matthew.glesne@lacity.org>

Jairo,

Thank you for confirming. I'll send along a calendar invite momentarily that will include call-in information.

Best,  
Cally

[Quoted text hidden]



Cally Hardy &lt;cally.hardy@lacity.org&gt;

---

## AB 52 / SB18 Tribal Consultation Notice - Housing Element Update (CPC-2020-1365-GPA; ENV-2020-6762-EIR)

---

Jairo Avila &lt;jairo.avila@tataviam-nsn.us&gt;

Tue, Dec 15, 2020 at 11:38 AM

To: Cally Hardy &lt;cally.hardy@lacity.org&gt;

Hello Cally,

The Cultural Resource Management (CRM) Division of the Fernandeano Tataviam Band of Mission Indians (FTBMI), appreciates the opportunity to consult under SB18 and AB52 for the proposed Housing Element Update (CPC-2020-1365-GPA; ENV-2020-6762-EIR) (Project) on December 1, 2020. The Project will establish guidelines and protocols for future development throughout the City of Los Angeles, which has the potential to impact significant Tribal Cultural Resources during construction. The CRM Division understands that the Project does not propose any construction. However, it is important that standard conditions and mitigation measures be updated to address the concerns of Tribes that are traditionally and culturally affiliated with the Project area. At this time, the CRM Division would like the following actions or similar objectives to be addressed and included within the Cultural Resource and Tribal Cultural Resource sections of the Environmental Impact Report (EIR).

### Actions:

- All cultural resource and tribal cultural resource assessment reports prepared shall include a record search with a study area of no less than 0.5 miles around the project area. Projects conducted in culturally and historically sensitive areas should include a record search with a study area of no less than 1 mile around the project area.
- Should projects have potential to impact cultural resources, as determined during the environmental assessment or Tribal consultation, a Cultural Resources Monitoring Program (CRMP) shall be prepared, in consultation with all interested Tribes consulting under AB52, prior to the commencement of any and all ground-disturbing activities for the Project, including any archaeological testing. The CRMP will provide details regarding the process for in-field treatment of inadvertent discoveries and the disposition of inadvertently discovered non-funerary resources.
- In the event that Tribal Cultural Resources are discovered during Project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and a qualified archaeologist meeting Secretary of Interior standards shall assess the find.
- Tribes that culturally and historically affiliate to the Project area and requested consultation shall be notified should any findings be discovered during project implementation.
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- Any and all archaeological/cultural documents created as a part of the Project (isolate records, site records, survey reports, testing reports, and monitoring reports) should be provided to consulting Tribes consulting.
- The Lead Agency and/or applicant shall, in good faith, provide all consulting Tribes the opportunity to consult on the disposition and treatment of resources.

The CRM Division looks forward to reviewing the Cultural Resources and Tribal Cultural Resource section of the Draft EIR to provide additional comments prior to concluding AB52 Consultation.

Should you have any questions regarding this email, please let me know. I appreciate your time and look forward to further updates on this Project.

Respectfully,

**Jairo F. Avila, M.A., RPA.**

*Tribal Historic and Cultural Preservation Officer*

Cultural Resources Management Division

**Tribal Historic and Cultural Preservation Department**

**Fernandeño Tataviam Band of Mission Indians**

1019 Second Street, Suite 1

San Fernando, California 91340

Office: (818) 837-0794

Website: <http://www.tataviam-nsn.us>

---

**From:** Cally Hardy <[cally.hardy@lacity.org](mailto:cally.hardy@lacity.org)>

**Sent:** Monday, November 16, 2020 1:26 PM

[Quoted text hidden]

[Quoted text hidden]





Cally Hardy <cally.hardy@lacity.org>

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## AB 52 / SB18 Tribal Consultation Notice - Housing Element Update (CPC-2020-1365-GPA; ENV-2020-6762-EIR)

---

Cally Hardy <cally.hardy@lacity.org>

Thu, Dec 17, 2020 at 7:48 PM

To: Jairo Avila <jairo.avila@tataviam-nsn.us>

Cc: Blair Smith <blair.smith@lacity.org>, Matthew Glesne <matthew.glesne@lacity.org>

Jairo,

Thank you for providing these comments. I am currently reviewing these with the team and will provide a response in the coming weeks regarding your suggested measures, your request to review the draft sections, and any next steps.

Regards,

Cally

[Quoted text hidden]



Cally Hardy <cally.hardy@lacity.org>

---

## AB 52 / SB18 Tribal Consultation Notice - Housing Element Update (CPC-2020-1365-GPA; ENV-2020-6762-EIR)

---

Jairo Avila <jairo.avila@tataviam-nsn.us>

Thu, Jan 21, 2021 at 9:10 AM

To: Cally Hardy <cally.hardy@lacity.org>

Hello Cally,

I am following up with you regarding the Housing Element Update. Can you provide me with an update on this Project and the requested Cultural Resources and Tribal Cultural Resource section of the Draft EIR?

Thank you,

**Jairo F. Avila, M.A., RPA.**

*Tribal Historic and Cultural Preservation Officer*

Cultural Resources Management Division

**Tribal Historic and Cultural Preservation Department**

**Fernandeño Tataviam Band of Mission Indians**

1019 Second Street, Suite 1

San Fernando, California 91340

Office: (818) 837-0794

Website: <http://www.tataviam-nsn.us>

---

**From:** Cally Hardy <cally.hardy@lacity.org>

**Sent:** Thursday, December 17, 2020 7:48 PM

[Quoted text hidden]

[Quoted text hidden]



Cally Hardy <cally.hardy@lacity.org>

---

## AB 52 / SB18 Tribal Consultation Notice - Housing Element Update (CPC-2020-1365-GPA; ENV-2020-6762-EIR)

---

Cally Hardy <cally.hardy@lacity.org>

Fri, Jan 22, 2021 at 3:32 PM

To: Jairo Avila <jairo.avila@tataviam-nsn.us>

Cc: Matthew Glesne <matthew.glesne@lacity.org>, Blair Smith <blair.smith@lacity.org>

Jairo,

Thank you for following up. We released the Notice of Preparation (NOP) for the project last week, and are holding two scoping meetings next week. You can find the materials and information about the scoping meetings on the Department's website, [here](#). The notice was also sent via mail to your contact information.

I am still reviewing your prior email with the project team, and will follow up next week with proposed next steps, including any needed follow up meetings to discuss.

Thank you,  
Cally

[Quoted text hidden]



Cally Hardy &lt;cally.hardy@lacity.org&gt;

---

**AB 52 / SB18 Tribal Consultation Notice - Housing Element Update (CPC-2020-1365-GPA; ENV-2020-6762-EIR)**

---

**Cally Hardy** <cally.hardy@lacity.org>

Fri, Jun 18, 2021 at 9:28 AM

To: Jairo Avila &lt;jairo.avila@tataviam-nsn.us&gt;

Cc: Matthew Glesne &lt;matthew.glesne@lacity.org&gt;, Blair Smith &lt;blair.smith@lacity.org&gt;

Jairo,

I hope you are well. I'm following up on our earlier emails and meeting regarding the Housing Element Update. We have reviewed your suggested measures, and have worked to incorporate them into the DEIR, which we intend to release for public review later this summer. The Draft Housing Element Update itself will be released for public review within the next few weeks.

Are you still interested in a follow up meeting to discuss the project further? If so, below are some available times:

Tues. 6/29 between 9-12

Weds. 6/30 from 9-10 or 11-12

Thurs. 7/1 from 9-12

Please let me know if any of these times work for you. Thank you.

Regards,

Cally

[Quoted text hidden]



Cally Hardy &lt;cally.hardy@lacity.org&gt;

---

**AB 52 / SB18 Tribal Consultation Notice - Housing Element Update (CPC-2020-1365-GPA; ENV-2020-6762-EIR)**

---

Jairo Avila &lt;jairo.avila@tataviam-nsn.us&gt;

Fri, Jun 25, 2021 at 1:09 PM

To: Cally Hardy &lt;cally.hardy@lacity.org&gt;

Cc: Matthew Glesne &lt;matthew.glesne@lacity.org&gt;, Blair Smith &lt;blair.smith@lacity.org&gt;

Hello Cally,

Thank you for the update and opportunity to schedule a meeting. Once the DEIR is available for public review, I will follow up should our office have any questions. However, unless you have any questions, the CRM is conformable concluding consultation for the Housing Element Update.

I appreciate your time and look forward to working with you on future tribal consultation efforts.

Respectfully,

**Jairo F. Avila, M.A., RPA.***Tribal Historic and Cultural Preservation Officer*

Cultural Resources Management Division

**Tribal Historic and Cultural Preservation Department****Fernandeño Tataviam Band of Mission Indians**

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**From:** Cally Hardy <cally.hardy@lacity.org>**Sent:** Friday, June 18, 2021 9:28 AM**To:** Jairo Avila <jairo.avila@tataviam-nsn.us>**Cc:** Matthew Glesne <matthew.glesne@lacity.org>; Blair Smith <blair.smith@lacity.org>

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Cally Hardy <cally.hardy@lacity.org>

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## AB 52 / SB18 Tribal Consultation Notice - Housing Element Update (CPC-2020-1365-GPA; ENV-2020-6762-EIR)

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Cally Hardy <cally.hardy@lacity.org>

Fri, Jun 25, 2021 at 4:20 PM

To: Jairo Avila <jairo.avila@tataviam-nsn.us>

Cc: Matthew Glesne <matthew.glesne@lacity.org>, Blair Smith <blair.smith@lacity.org>

Jairo,

Thank you for letting me know. You are included on our notification list and will receive notice when the DEIR is available for review.

Moving forward, please feel free to reach out with any questions regarding the Project.

Regards,

Cally

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