T.O. Ranch Mixed-Use and Multi-Family Residential Redevelopment Project

Final Environmental Impact Report

State Clearinghouse No. 2021120559

prepared by

City of Thousand Oaks
Community Development
2100 Thousand Oaks Boulevard
Thousand Oaks, California 91362
Contact: Carlos Contreras, Senior Planner

prepared with the assistance of

Rincon Consultants, Inc.
250 East 1st Street, Suite 1400
Los Angeles, California 90012

June 2022

RINCON CONSULTANTS, INC.
Environmental Scientists | Planners | Engineers
rinconconsultants.com

T.O. Ranch Mixed-Use and Multi-Family Residential Redevelopment Project

Final Environmental Impact Report
State Clearinghouse No. 2021120559

prepared by

City of Thousand Oaks
Community Development
2100 Thousand Oaks Boulevard
Thousand Oaks, California 91362
Contact: Carlos Contreras, Senior Planner

prepared with the assistance of

Rincon Consultants, Inc.
250 East 1st Street, Suite 1400
Los Angeles, California 90012

June 2022

RINCON CONSULTANTS, INC.
Environmental Scientists | Planners | Engineers
rinconconsultants.com

This report prepared on 50% recycled paper with 50% post-consumer content.

Table of Contents

Appendices

1 Introduction

Pursuant to State CEQA Guidelines, this Final Environmental Impact Report (Final EIR) has been prepared by the City of Thousand Oaks (City) Planning Division to evaluate the potential environmental impacts of the proposed T.O. Ranch Mixed-Use Multi Family Residential Redevelopment project ("proposed project" or "project"). This document, together with the Draft EIR (incorporated by reference) comprise the Final EIR for this project. The City has provided a good faith effort to respond to all significant environmental issues raised by the comments.

1.1 Organization and Scope of the Final EIR

The Final EIR is organized according to the following:

- **Section 1: Introduction.** Summarizes the contents of the Final EIR and the environmental review process.
- **Section 2: Responses to Comments on the Draft EIR.** During the public review process for the Draft EIR, the City received 16 comment letters related to the Draft EIR. This section includes a summary of all comment letters and the City's responses to those comments.
- **Section 3: Corrections and Additions to the Draft EIR.** This section provides a list of changes that were made to the Draft EIR. These revisions are shown in ~~strikeout~~ and underline text in this section.
- **Section 4: Mitigation Monitoring and Report Program (MMRP).** This section of the Final EIR provides the MMRP for the proposed project. The MMRP is presented in tabular form and identifies mitigation measures, the monitoring and implementation period for each mitigation measure, as well as the appropriate mitigation agency.
- **Appendices** which include revised Appendices
  - Appendix A: NOP and Comment Letters
  - Appendix B: AQ-GHG-Energy
  - Appendix C: Biological Resources
  - Appendix D: Cultural Resources
  - Appendix E: Geology and Soils
  - Appendix F: Hazards and Hazardous Resources
  - Appendix G: Noise
  - Appendix H: Transportation and Traffic
  - Appendix I: Wildfire
  - Appendix J: Utilities

1.2 Background and Purpose of the EIR

Overview of CEQA Requirements for Preparation of an EIR State CEQA Guidelines

Section 15121(a) of the CEQA Guidelines states that an EIR is an informational document for decisionmakers and the general public to analyze the significant environmental effects of a proposed project, identify actions to minimize potential significant effects, and describe reasonable alternatives to the proposed project that could reduce or avoid its adverse environmental impacts. Public agencies with discretionary authority are therefore required to consider the information in the EIR, along with all other relevant information, in making decisions on the proposed project. For the purposes of CEQA, the term "project" refers to the whole of an action, which has the potential for resulting in a direct physical change or a reasonably foreseeable indirect physical change in the environment (CEQA Guidelines Section 15378[a]).

Environmental Review Process for the Proposed Project

The following is an overview of the environmental review process for the proposed project that has led to the preparation of this Final EIR.

Notice of Preparation and Project Scoping

In accordance with Section 15082 of the State CEQA Guidelines, a Notice of Preparation for the Draft EIR was published December 22, 2021 and sent to all applicable responsible and trustee agencies and the Office of Planning and Research's State Clearinghouse (SCH, Number 2021120559). The published NOP and associated comment letters are included as Appendix A of the Draft EIR.

A virtual scoping meeting for this project was conducted on January 12, 2022.

This proposed project received a total of four comment letters (see Table 1) during the project scoping period between December 23, 2021 and January 31, 2022.

Commenter	Date(s) Received
Agency	
California Department of Transportation (Caltrans)	January 20, 2022
Ventura County Air Pollution Control District (VCAPCD)	January 31, 2022
Organization	
Mitchell Tsai on behalf of Southwest Regional Council of Carpenters (SWRCC)	January 13, 2022, resent January 31, 2022
Individuals	
Rose Ann Witt	January 31, 2022, resent with update February 1, 2022

Draft EIR

A Notice of Availability (NOA) of the Draft EIR was submitted to the State Clearinghouse on April 8, 2022 and published by the California Governor's Office of Planning and Research on April 11, 2022 to begin the Draft EIR 45-day public review period (Public Resources Code [PRC] Section 21161), which began on April 11, 2022 and ended on May 25, 2022. The Draft EIR contained a description of the proposed project, identification of project impacts and mitigation measures, discussion of project

alternatives, and other CEQA considerations. The Draft EIR was made available on the City's website (https://www.toaks.org/departments/community-development/planning/environmental-impact).

Final EIR

The City received 16 comment letters from agencies, organizations and interested parties regarding the Draft EIR. This document and the Draft EIR, as amended herein, constitute the FEIR. Sections 15089 and 15132 of the State CEQA Guidelines require a lead agency to prepare a Final EIR before approving a project. Pursuant to CEQA Guidelines Section 15132, a Final EIR must contain the following:

- The Draft EIR or any revisions to the Draft EIR;
- A list of persons, organizations, and public agencies commenting on the Draft EIR;
- Comments and recommendations received on the Draft EIR;
- Responses to any comments and recommendations on the Draft EIR; and,
- Any other information added by the Lead Agency since the public availability of the Draft EIR.

Mitigation Monitoring and Reporting Program

Public Resources Code Section §21081.6 also requires lead agencies to adopt a mitigation monitoring and reporting program (MMRP) describing measures to be adopted or made a condition of project approval in order to mitigate or avoid significant effects on the environment. Therefore, this FEIR also includes a mitigation monitoring and reporting program for the project.

Certification of the Final EIR

The City will review and consider the Final EIR and if it finds that it is "adequate and complete", the City Council may certify the Final EIR. The EIR can be certified if: 1) it shows a good faith effort at full disclosure of environmental information; and 2) provides sufficient analysis to allow decisions to be made regarding the project regarding its environmental consequences.

1.3 Intended Uses of the EIR

The EIR is intended to evaluate the environmental impacts of the project and is to be used to modify, approve, or deny the proposed project based on the analysis in the EIR. In accordance with State CEQA Guidelines Section §15126, this EIR should be used as the primary environmental document to evaluate all subsequent planning and permitting actions associated with the EIR.

1.4 Comments on the Draft EIR and Response to Comments

Requirements for Responding to Comments on a Draft EIR

State CEQA Guidelines Section §15088 requires that lead agencies evaluate all comments on environmental issues received on the DEIR and prepare a written response. The written response must address the significant environmental issue raised and must provide a detailed response, especially when specific comments or suggestions (e.g., additional mitigation measures) are not accepted. In addition, there must be a good faith and reasoned analysis in the written response, if required. However, lead agencies need only respond to significant environmental issues associated

with the project and do not need to provide all the information requested by commenters, as long as a good faith effort at full disclosure is made in the EIR (State CEQA Guidelines §15204).

State CEQA Guidelines Section §15204 recommends that commenters provide detailed comments, with relevant explanation and evidence, that focus on the sufficiency of the Draft EIR in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. Pursuant to State CEQA Guidelines Section §15064, an effect shall not be considered significant in the absence of substantial evidence supporting such a conclusion.

State CEQA Guidelines Section §15088 also recommends that where a response to comments results in revisions to the Draft EIR, that those revisions be incorporated as a revision to the Draft EIR or as a separate section of the Final EIR.

Summary of Comments Received

The Draft EIR was circulated for a 45-day public review period that began on April 11, 2022 and ended on May 25, 2022. A total of 16 comment letters were received by the City on the Draft EIR and these include: seven from State and local agencies, five from organizations, and four from interested parties.

1.5 EIR Certification Process and Project Approval

Pursuant to CEQA Guidelines 15090(a), before adopting the proposed project, the lead agency is required to certify that the Final EIR has been completed in compliance with CEQA regulations, and that the decision-making body for the jurisdiction has reviewed and considered the information, analysis, potential impacts and associated mitigation measures, as appropriate, in the Draft EIR, and that the Final EIR reflects the independent judgment of the lead agency. Section 15088(b) of the State CEQA Guidelines requires a lead agency to provide a written response to a public agency on comments made by that public agency at least 10 days prior to certifying an EIR.

Pursuant to sections 21002, 21002.1 and 21081 of CEQA and sections 15091 and 15093 of the State CEQA Guidelines, no public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant effects unless both of the following occur:

(a) The public agency makes one or more of the following findings with respect to each significant effect: 1. Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effects on the environment. 2. Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been or can and should be, adopted by such other agency. Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report.

(b) With respect to significant effects which were subject to a finding under paragraph (3) of subdivision (a), the public agency finds that specific overriding economic, legal, social, technological, or other benefits of the project outweigh the significant effects on the environment.

If an agency approves a proposed project with unavoidable significant environmental effects, it must prepare a written Statement of Overriding Considerations that sets forth the specific social, economic,

or other reasons supporting the agency's decision and explains why the proposed project's benefits outweigh the significant environmental effects (State CEQA Guidelines Section 15093).

This page intentionally left blank.

2 Responses to Comments on the Draft EIR

This section includes comments received during public circulation of the Draft Environmental Impact Report (EIR) prepared for the T.O. Ranch Mixed-Use Multi Family Residential Redevelopment project ("proposed project" or "project")

The Draft EIR was circulated for a 45-day public review period that began on the Draft EIR was circulated for a 45-day public review period that began on April 11, 2022 and ended on May 25, 2022. The City of Thousand Oaks received 16 comment letters on the Draft EIR. The commenters and the page number on which each commenter's letter appear are listed below.

2.1 Specific Responses

Letter Number and Commenter		Date of Letter	Page Number
Agency			
A-1	Ventura County Public Works	5/2/22	2-3
A-2	Ventura County Health Department	5/10/22	2-7
A-3	Conejo Recreation and Parks District	5/17/22	2-9
A-4	Conejo Recreation and Parks District	5/20/22	2-17
A-5	Department of Fish and Wildlife	5/20/22	2-20
A-6	Department of Transportation	5/20/22	2-46
A-7	Ventura County Air Pollution Control District	5/23/22	2-53
Interested Parties			
IP-1	Eric De Wames	3/23/22	2-71
IP-2	Alan Huffine	5/5/22	2-74
IP-3	Rose Angela, Little Dreamers	5/10/22	2-79
IP-4	William D. Koehler	5/23/22	2-82
Organizations			
O-1	Southwest Regional Council of Carpenters	5/13/22	2-86
O-2	Thousand Oaks Chamber of Commerce	5/19/22	2-95
O-3	Supporters Alliance for Environmental Responsibility	5/23/22	2-107
O-4	Southwest Regional Council of Carpenters	5/23/22	2-111
O-5	Many Mansions	5/23/22	2-409

The comment letters and responses follow. The comment letters are numbered sequentially, and each separate issue raised by the commenter, if more than one, has been assigned a number. The responses to each comment identify first the number of the comment letter, and then the number assigned to each issue (Response O-1-1, for example, indicates that the response is for the first issue raised in Comment Letter O-1).

Where a comment resulted in a change to the Draft EIR text, a notation is made in the response indicating that the text is revised. Changes in text are signified by strikeout font (~~strikeout font~~) where

text was removed and by underlined font (<u>underlined font</u>) where text was added. These changes in text are also included in Section 3, *Revisions to the Draft EIR*.

Letter A-1

PUBLIC WORKS
VENTURA COUNTY

WATERSHED PROTECTION

MEMORANDUM

DATE: May 2, 2022

TO: Anthony Ciuffetelli, Planner, Planning Division

FROM: James Maxwell, Groundwater Specialist, Water Resources Division

SUBJECT: RMA 22-005 – T.O. Ranch Mixed-Use and Multi-Family Residential Redevelopment Project

The Ventura County Public Works Agency, Water Resources Division (VCWRD) reviewed the *Draft Environmental Impact Report* (DEIR) submitted by the City of Thousand Oaks.

PROJECT DESCRIPTION

The proposed project is located at 325 and 391 Hampshire Road in the City of Thousand Oaks, on the west side of Hampshire Road, north and east side of Foothill Drive, and 540 feet south of Highway 101 on Assessor's Parcel Numbers (APNs) 676-0-150-365, -285, and -375. The 10.97-acre site is currently developed with vacant buildings and a large parking lot. The project would involve demolishing the existing structures, parking lot, landscaping, and vegetation. Approximately 420 mixed-use and multi-family residential units and 15,000 square feet (SF) of restaurant and retail space. A two-story amenity structure of 5,000-SF and outside area would be part of the residential open space.

ENVIRONMENTAL IMPACT ANALYSIS

The Site overlies the Thousand Oaks Area Basin, a very low priority basin designated by the Department of Water Resources (DWR) as Basin No. 4-019. County records indicate there is a domestic groundwater wells located within the project parcels that is classified as "cannot be located". Wells not classified as "destroyed" and that will not be used by the Project or considered as "active" status will need to be permitted for destruction with the County per Ventura County Ordinance No. 4468 (Well Ordinance). The proposed development will not extract groundwater from any off-site wells. A-1-1

Water for grading and construction and for the development at full build-out will be supplied by the City of Thousand Oaks which obtains potable water from Calleguas Municipal Water District (CMWD). CMWD purchases imported State Water Project (SWP) water from Metropolitan Water District. According to the City of Thousand Oaks 2020 Urban Water Management Plan (UWMP), groundwater is not a source of potable water for the City. According to the *Preliminary Water System Capacity Study* prepared by Stantec Consulting Services, Inc. and dated November 29, 2021 in Appendix J of the DEIR, the total average water demand for the project was calculated to be 87,541 gallons A-1-2

per day (gpd) or 98.059 acre-feet per year (AFY). The City of Thousand Oaks owns two groundwater wells which are used for landscape irrigation. The UWMP anticipates having enough sufficient supplies to meet City imported water demands through 2045. This is in alignment with the *Ventura County 2040 General Plan*, Water Resources Element Implementation Programs F and I. A-1-2 cont'd

The project site will be provided wastewater service by the City of Thousand Oaks. Generated wastewater will be conveyed to the Hill Canyon Treatment Plant (HCTP). The *Preliminary Sanitary Sewer Capacity Study* dated November 30, 2021 was provided by Stantec Consulting Services, Inc. HCTP treats an average of 8.5 million gallons per day (mgd) with a total capacity of 14 mgd. The total calculated sewer discharge for the project was 70,033 gpd. The excess capacity of 5.5 mgd will be sufficient to accommodate the project demands. A-1-3

The *Preliminary Drainage Report and Stormwater Quality Analysis* dated December 10, 2021 and prepared by Stantec Consulting Services, Inc. was included in Appendix J of the DEIR. The amount of onsite impervious surfaces would be reduced from 91 to 75 percent. However, the report states that "Site-specific geotechnical investigations determined that the site has little to no potential for infiltration. As such, infiltration based BMPs are not feasible for this project." A drainage and treatment system will utilize filtered catch basins and biofiltration BMPs along with underground detention pipes for stormwater before discharging to existing public drain facilities. A-1-4

The proposed project would require approximately 120,000 cubic yards of material to be exported. No import of fill material is anticipated. A-1-5

Letter A-1

COMMENTER: Ventura County Public Works

DATE: May 2, 2022

Comment A-1-1

The commenter provides the state of the project site. The commenter also states the proposed development will not extract groundwater from any off-site wells.

Response A-1-1

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. City of Thousand Oaks decision makers will consider all comments on the proposed project. No further response is necessary.

Comment A-1-2

The commenter provides water supply information and states the Urban Water Management Plan (UWMP) anticipates having enough sufficient supplies to meet city imported water demands through 2045. This is in alignment with the Ventura County 2040 General Plan, Water Resources Element, Implementation Programs F and l.

Response A-1-2

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. City of Thousand Oaks decision makers will consider all comments on the proposed project. No further response is necessary.

Comment A-1-3

The commenter states the Hill Canyon Treatment Plant, treats an average of 8.5 million gallons per day (mgd) with a total capacity of 14 mgd. The total calculated sewer discharge for the project was 70,033 gpd, with an excess capacity of 5.5 mgd which would be sufficient to accommodate the project demands.

Response A-1-3

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. City of Thousand Oaks decision makers will consider all comments on the proposed project. No further response is necessary.

Comment A-1-4

The commenter states the amount of onsite impervious surfaces would be reduced from 91 to 75 percent. The site-specific geotechnical investigations determined that the site has little to no potential for infiltration and infiltration based best management practices (BMPs) are not feasible for this project. The commenter states that a drainage and treatment system would utilize filtered catch basins and biofiltration BMPs along with underground detention pipes for stormwater before discharging to existing public drainage facilities.

Response A-1-4

The comment is noted, the project would implement drainage and treatment system with filtered catch basins and biofiltration BMPs along with underground detention pipes for stormwater before discharging to existing public drainage facilities. Additionally, the project would be required to obtain National Pollutant Discharge Elimination System (NPDES) coverage under the General Permit for Storm Water Discharges Associated with Construction Activity (known as the Construction General Permit or CGP) from the State Water Resource Control Board (SWRCB). Moreover, this comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. City of Thousand Oaks decision makers will consider all comments on the proposed project. No further response is necessary.

Comment A-1-5

The commenter states the proposed project would require approximately 120,000 cubic yards of material to be exported. No import of fill material is anticipated.

Response A-1-5

The commenter is correct the proposed project would require approximately 120,000 cubic yards of material to be exported. Moreover, this comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. City of Thousand Oaks decision makers will consider all comments on the proposed project. No further response is necessary.

COUNTY of VENTURA

RESOURCE MANAGEMENT AGENCY
CHARLES R. GENKEL
Environmental Health Director

May 10, 2022

Letter A-2

City of Thousand Oaks, Community Development Department, Planning Division
ATTN: Carlos Contreras, Senior Planner, Development Planning Supervisor
2100 Thousand Oaks Boulevard
Thousand Oaks, CA 91362

Thousand Oaks Ranch Mixed-Use and Multi-Family Residential Redevelopment Project, Environmental Document Review – Notice of a Draft Environmental Impact Report, (RMA REF # 22-005)

Ventura County Environmental Health Division (Division) staff reviewed the information submitted for the subject project.

The Division provides the following comments:

1. The proposed residential development includes construction of a community recreation area with swimming pool. The builder/applicant shall submit plans for the public swimming pool to this Division and obtain plan approval prior to beginning any construction of the community swimming pool and auxiliary structures. A permit to operate the swimming pool is also required prior to use inauguration. Contact the Ventura County Environmental Health Division, Community Services Section for information on swimming pool plan review and permitting requirements. A-2-1

2. Project includes the potential construction of commercial food facilities. Food facilities are subject to plan review and permitting by this Division. The applicant/food facility operator must submit plans to the Ventura County Environmental Health Division, Community Services Section and obtain plan approval prior to beginning any construction of any food facility. A Permit to Operate is required prior to beginning any retail food operations. A-2-2

If you have any questions, please contact me at (805) 654-2830 or Ashley.Kennedy@ventura.org.

Ashley Kennedy, R.E.H.S.
Land Use Section
Environmental Health Division

KB N:\Admin\TECH SERVICES\FINALED Letters\Land Use\SR0019993 ODR RMA Ref 22-005 T.O. Ranch Mixed Use and MultiFamily Res Dev Project - 05 10 2022.docx

HALL OF ADMINISTRATION #1730
805-654-2813 • FAX 805-654-2480 • 800 South Victoria Avenue, Ventura, CA 93009 • vcrma.org

Letter A-2

COMMENTER: Ventura County Environmental Health Division

DATE: May 10, 2022

Comment A-2-1

The commenter provides information on the community recreation area with swimming pool. The commenter requests that the Applicant submit plans for the public swimming pool to Ventura County Environmental Health Division for approval prior to construction of the community swimming pool and auxiliary structures. The comment also states that a permit to operate the swimming pool would be required.

Response A-2-1

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. City of Thousand Oaks decision makers will consider all comments on the proposed project. Nevertheless, Conditions of Approval applied to the project require the Applicant to obtain plan approval prior to beginning any construction of the community swimming pool and auxiliary structures. No further response is necessary.

Comment A-2-2

The commenter states the project includes the potential construction of commercial food facilities and such facilities are subject to plan review and permitting by Ventura County Environmental Health Division. The commenter states the Applicant/food facility operator must submit plans and plan approval prior to beginning any construction of any food facility.

Response A-2-2

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. City of Thousand Oaks decision makers will consider all comments on the proposed project. Nevertheless, Conditions of Approval applied to the project require the Applicant to submit plans to the Ventura County Environmental Health Division, Community Services Section and obtain plan approval prior to beginning any construction of any food facility. No further response is necessary.

Letter A-3

May 17, 2022

Carlos Contreras, Senior Planner
City of Thousand Oaks
2100 Thousand Oaks Blvd.
Thousand Oaks, CA 91362

RE: Comments to Draft EIR for T.O. Ranch Mixed-Use and Multi-Family Residential Redevelopment Project

Dear Mr. Contreras,

Thank you for the opportunity for the Conejo Recreation and Park District ("CRPD") to express its concerns and provide its comments on inaccuracies and omissions in the Draft Environmental Impact Report (DEIR) for the subject apartment and mixed-use project ("Project"). The Project calls for the development of 402 dwelling units on approximately 10.97 acres that were previously considered by CRPD as a commercial use site. The addition of such a large number of dwelling units at a higher urban density of 38.29 du/pa with the estimated new 1,121 residents to this infill site creates a significant new demand on the limited existing "public" park facilities. That deficiency needs to be addressed and the adverse impact needs to be mitigated. A-3-1

CRPD's Park Standards

CRPD is a separate independent public entity and is not a subdivision of the County of Ventura. CRPD can, and has, established its own park standards. CRPD was created to act independently and not be a department of the City of Thousand Oaks or the County of Ventura. CRPD, in accordance with the 2011 CRPD Master Plan (revisions July 19, 2012 and September 3, 2020), follows the National Recreation and Park Association's standard of providing 10 acres of parkland per 1,000 persons (5 acres for neighborhood, playfield, community parks, and another 5 acres for a districtwide park), not the "County Standard of five park-acres per 1,000 population" (page 4.13-6 of the DEIR). A-3-2

Proposed Subject Project Private On-Site Amenities

In accordance with the 2011 CRPD Master Plan (revisions July 19, 2012 and September 3, 2020), none of the proposed small private on-site acreage/open space/recreational apartment amenities (as described in Section 4.13 of the DEIR), individually or cumulatively, are considered by CRPD in calculating or the Project meeting its public park acreage contribution requirements per CRPD standards, with the possible exception of the proposed "Dog Park/Community Park." A-3-3

A simple look at Figure 4.13-2's layout, size, and location of "Park and Recreational Amenities Proposed" for the Project in the DEIR show such are the customary and limited street scape/sidewalk improvements that every developer must provide and are the standard apartment complex amenities of "Pocket Parks", "Seating Garden", and "Paseo Garden Paths", none of which meet CRPD park standards. There is no similarity between these private interior paved and narrow sidewalks or between the customary perimete A-3-4

street scape/sidewalks, or between the Project's constructed unnatural balconies and confined interio patios with CRPD's much larger open active recreational public parks, with playfields or playgrounds and its natural open space areas with hiking trails. There is simply no factual basis that the Project adds 4.7 acres of public open space or useable community park facilities. A-3-4 (cont'd)

In accordance with the 2011 CRPD Master Plan (revisions July 19, 2012 and September 3, 2020), a Neighborhood Park, the District's smallest park facility, is a typical size of 2 to 10 acres and includes both passive and active recreational opportunities such as playgrounds, multi-purpose open turf areas, basketball and volleyball courts, picnic tables and/or picnic shelters, outdoor fitness areas, and walking paths. A-3-5

In accordance with the 2011 CRPD Master Plan (revisions July 19, 2012 and September 3, 2020), a dog park is considered a Special Facility. Provided with additional information - size, availability to the general public, maintenance responsibilities, operating hours, ancillary amenities (on-site parking, restrooms, etc.) that makes the amenity available to the general public consistent with CRPD standards - CRPD may potentially consider the "Dog Park/Community Park" meeting CRPD park acreage standards. A-3-6

Impact Analysis

The public park facility availability baseline must consist of the physical conditions that actually exist at the time of the DEIR analysis. Cal. Code Regs., tit. 14, §15125. The Project is located within CRPD's Community Planning Zone I – Planning Area 1. Not even considering districtwide park acreage requirements, in accordance with the 2011 CRPD Master Plan (revisions July 19, 2012 and September 3, 2020), currently: A-3-7

- Planning Area 1 residents have a surplus of only 0.2 acres of Neighborhood Park developed acreage
- Zone I residents have a deficiency of 1.4 acres of Playfields developed acreage
- Zone I residents have a deficiency of 13.4 acres of Community Park developed acreage

"An EIR shall discuss cumulative impacts of a project when the project's incremental effect is cumulatively considerable . . ." Cal. Code Regs., tit. 14, §15130. The City has recently conceptually approved hundreds of acres for similar mixed-use projects on commercial sites with the primary financial driver for that contemplated development being adding new residential dwelling units. CRPD does not agree that the project's incremental contribution of 1,121 new residents to the above cumulative effect is not significant and that incremental effect is cumulatively considerable.[1] As described in the DEIR, the Project's proposed "variety of open space and recreational amenities" would not provide the required parkland dedication or even make an in-lieu mitigation fee. Any development with a proposed population increase of 1,121 persons would result in an additional parkland dedication of: A-3-8

- Planning Area 1 – additional 2.8 acres of Neighborhood Park developed acreage
- Zone I – additional 1.4 acres of Playfields developed acreage
- Zone I – additional 1.4 acres of Community Park developed acreage

[1] Although the CEQA guideline does not specifically refer to the "fair argument" standard, CRPD believes that low standard would apply.

Summary

Based on the 2011 CRPD Master Plan (revisions July 19, 2012 and September 3, 2020), CRPD finds that the Project will result in an incremental effect that is cumulatively considerable in the substantial deterioration of existing public parks and recreation facilities and will require a need to construct new or expand recreational facilities within the Community Planning Zone I – Planning Area 1. The DEIR's "discussion of mitigation measures shall distinguish between the measures which are proposed by project proponents to be included in the project and other measures proposed by . . . responsible or trustee agency" such as CRPD which the City should determine "could reasonably be expected to reduce adverse impacts if required as conditions of approving the project". Cal. Code Regs., tit. 14, §15126.4. The DEIR's failure to Identify Feasible Mitigation Measures, including measures capable of reducing the new residents' impacts on CRPD open space and existing public parks, possibly requires a revised Draft EIR that needs to be prepared to remedy the deficiencies discussed above. Only that way can the public and the agencies be adequately informed of the environmental repercussions of the project. A-3-9 A-3-10 A-3-11

However, in the alternative, CRPD can discuss and collaborate with representatives of the Project on mitigation measures to provide the required parkland acreage or on an adequate financial contribution[2] to offset the increased use of existing recreational facilities that are affected by the proposed subject project. A-3-12

We feel the DEIR for the project fails to satisfy CEQA's requirements and may be legally inadequate. An EIR must provide a degree of analysis and detail about environmental or park impacts that will enable decision-makers to make intelligent judgments in light of the environmental consequences of their decisions. CEQA Guidelines §15151. A-3-13

Sincerely,

T. P. Hare, Administrator
Parks and Planning

[2] We point to TOMC Sec. 9-4.2602 that requires residential developments not seeking a subdivision shall dedicate land, pay a fee, or both, for park and recreational purposes as set forth in Sections 9-4.2603 through 9-4.2611 of this article. As a result, CRPD has created an understanding with the developers of similar mixed-use projects with new residential units on commercial sites on Thousand Oaks Boulevard to make a contribution of $11,724 per dwelling unit, a fee that goes up every February 5th and the CRPD needs to be consistent and fair with every mixed-use developer. See also: TOMC Sec. 9-4.2607 Amount of fees in lieu of land dedication.

Letter A-3

COMMENTER: Conejo Recreation and Parks District (CRPD)

DATE: May 17, 2022

Comment A-3-1

The commenter states the project calls for the development of 402 dwelling units on approximately 10.97 acres that were previously considered by CRPD as a commercial use site and the new 1,121 residents may create recreational needs to be addressed and mitigated.

Response A-3-1

CRPD's Park Standards are noted, Impacts regarding recreation associated with the project are discussed in Section 4.13, *Recreation* of the Draft EIR. The project provides open space in excess of City requirements (see Draft EIR, Tables 4.13-2 and 4.13-3), which would help offset any potential demand on parks in the vicinity of the project site. Therefore, the project would not significantly 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 and impacts would be less than significant.

Comment A-3-2

The commenter states the CRPD is a separate independent public entity and is not a subdivision of the County of Ventura. CRPD has its own park standards. CRPD was created to act independently and not be a department of the City of Thousand Oaks or the County of Ventura. CRPD, in accordance with the 2011 CRPD Master Plan (revisions July 19, 2012 and September 3, 2020), follows the National Recreation and Park Association's standard of providing 10 acres of parkland per 1,000 persons (5 acres for neighborhood, playfield, community parks, and another 5 acres for a districtwide park), not the "County Standard of five park-acres per 1,000 population" (page 4.13-6 of the Draft EIR).

Response A-3-2

CRPD's Park Standards are noted. As stated in Section 4.13.2 of the Draft EIR, California State Legislature established the Quimby Act which allows the legislative body of a city or county to establish an ordinance requiring the dedication of land, payment of fees in lieu thereof, or a combination of both, for the provision of parks or recreational facilities as a condition to the approval of a tentative tract map or parcel map. Conditions of Approval applied to the project requires the Applicant to pay all required Quimby Fees to CRPD to meet the equate financial contribution to offset the increased use of existing recreational facilities that are affected by the proposed subject project. Moreover, this comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. City of Thousand Oaks decision makers will consider all comments on the proposed project.

Comment A-3-3

The commenter states that in accordance with the 2011 CRPD Master Plan (revisions July 19, 2012 and September 3, 2020), none of the proposed small private on-site acreage/open space/recreational apartment amenities (as described in Section 4.13 of the Draft EIR), are considered by CRPD in

calculating or the project meeting its public park acreage contribution requirements per CRPD standards, with the possible exception of the proposed "Dog Park/Community Park."

Response A-3-3

As stated in Section 4.13.2 of the Draft EIR, California State Legislature established the Quimby Act which allows the legislative body of a city or county to establish an ordinance requiring the dedication of land, payment of fees in lieu thereof, or a combination of both, for the provision of parks or recreational facilities as a condition to the approval of a tentative tract map or parcel map. Conditions of Approval applied to the project requires the Applicant to pay all required Quimby Fees to CRPD to meet the equate financial contribution to offset the increased use of existing recreational facilities that are affected by the proposed subject project.

Comment A-3-4

The commenter states the standard apartment complex amenities of "Pocket Parks," "Seating Garden," and" Paseo Garden Paths," do not meet CRPD park standards.

Response A-3-4

The comment is noted. As stated in Section 4.13.2 of the Draft EIR, Conditions of Approval applied to the project requires the Applicant to pay all required Quimby Fees to CRPD to meet the equate financial contribution to offset the increased use of existing recreational facilities that are affected by the proposed subject project. In addition, Government Code Section 66477 (The Quimby Act) permits credit for park and recreational improvements to dedicated land to be used strictly for said purposes if appropriate.

Comment A-3-5

The commenter states the 2011 CRPD Master Plan (revisions July 19, 2012 and September 3, 2020), a Neighborhood Park, the District's smallest park facility, is a typical size of 2 to 10 acres and includes both passive and active recreational opportunities such as playgrounds, multi-purpose open turf areas, basketball and volleyball courts, picnic tables and/or picnic shelters, outdoor fitness areas, and walking paths.

Response A-3-5

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. City of Thousand Oaks decision makers will consider all comments on the proposed project. No further response is necessary.

Comment A-3-6

The commenter states the 2011 CRPD Master Plan (revisions July 19, 2012 and September 3, 2020), a dog park is considered a Special Facility. Provided with additional information - size, availability to the general public, maintenance responsibilities, operating hours, ancillary amenities (on-site parking, restrooms, etc.) that makes the amenity available to the general public consistent with CRPD standards - CRPD may potentially consider the "Dog Park/Community Park" meeting CRPD park acreage standards.

Response A-3-6

The comment is noted. As stated in Section 4.13.2 of the Draft EIR, Conditions of Approval applied to the project requires the Applicant to pay all required Quimby Fees to CRPD to meet the equate financial contribution to offset the increased use of existing recreational facilities that are affected by the proposed subject project. In addition, Government Code Section 66477 (The Quimby Act) permits credit for park and recreational improvements to dedicated land to be used strictly for said purposes if appropriate. Also, the Quimby Act does not necessarily require a dedicated park or recreational improvements meet CRPD standards to qualify and there are City-owned and maintained parks and COSCA open space that would be considered dedicated land for recreational purposes and may be defined as a "park."

Comment A-3-7

The commenter states the project is located within CRPD's Community Planning Zone I – Planning Area 1 and in accordance with the 2011 CRPD Master Plan, currently: Planning Area 1 residents have a surplus of only 0.2 acre of Neighborhood Park developed acreage; Zone I residents have a deficiency of 1.4 acres of Playfields developed acreage, Zone I residents have a deficiency of 13.4 acres of Community Park developed acreage.

Response A-3-7

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. City of Thousand Oaks decision makers will consider all comments on the proposed project. No further response is necessary.

Comment A-3-8

The commenter states the City has recently conceptually approved hundreds of acres for similar mixed-use projects on commercial sites with the primary financial driver for that contemplated development being adding new residential dwelling units. The commenter states they do not agree that the project's incremental contribution of 1,121 new residents to the above cumulative effect is not significant and that incremental effect is cumulatively considerable and as described in the Draft EIR, the project's proposed "variety of open space and recreational amenities" would not provide the required parkland dedication or even make an in-lieu mitigation fee. The commenter states any development with a proposed population increase of 1,121 persons would result in an additional parkland dedication of: Planning Area 1 – additional 2.8 acres of Neighborhood Park developed acreage, Zone I – additional 1.4 acres of Playfields developed acreage, Zone I – additional 1.4 acres of Community Park developed acreage.

Response A-3-8

The comment is noted. As stated in Section 4.13.2 of the Draft EIR, California State Legislature established the Quimby Act which allows the legislative body of a city or county to establish an ordinance requiring the dedication of land, payment of fees in lieu thereof, or a combination of both, for the provision of parks or recreational facilities as a condition to the approval of a tentative tract map or parcel map. Conditions of Approval applied to the project requires the Applicant to pay all required Quimby Fees to CRPD to meet the equate financial contribution to offset the increased use of existing recreational facilities that are affected by the proposed subject project. The commenter's statement that the City has conceptually approved hundreds of acres for similar mixed-use projects

is based on the commenter's assumption that the General Plan Update will be adopted. CEQA requires that cumulative impact analysis consider only closely related past, present, and reasonably foreseeable probable future projects. The adoption of the General Plan Update as currently proposed is speculative at this time. Further, the City has no information of the hypothetical potential future projects to which the commenter refers and no applications for such hypothetical projects have been received. Accordingly, this statement is not relevant to the CEQA analysis for the subject project. Commenters assertion in this regard is too speculative and outside the scope of CEQA analysis.

Comment A-3-9

The commenter states the project will result in an incremental effect that is cumulatively considerable in the substantial deterioration of existing public parks and recreation facilities and will require a need to construct new or expand recreational facilities within the Community Planning Zone I – Planning Area 1.

Response A-3-9

The comment is noted. As stated in Section 4.13.2 of the Draft EIR, Conditions of Approval applied to the project requires the Applicant to pay all required Quimby Fees to CRPD to meet the equate financial contribution to offset the increased use of existing recreational facilities that are affected by the proposed subject project. Also see response to A-3-8.

Comment A-3-10

The commenter states the Draft EIR's "discussion of mitigation measures shall distinguish between the measures which are proposed by project proponents to be included in the project and other measures proposed by "responsible or trustee agency" such as the commenting party which the City should determine "could reasonably be expected to reduce adverse impacts if required as conditions of approving the project."

Response A-3-10

As stated in Chapter 2, *Project Description* and Section 4.13, *Recreation* of the Draft EIR described the project design features of the proposed project related to recreation that would include public open space (including a dog park, a seating garden, paseos, and trail connections), and private open space. The public open space included as part of the proposed project would be available to the greater Thousand Oaks community. In addition, Conditions of Approval applied to the project requires the Applicant to pay all required Quimby Fees to CRPD to meet the financial contribution to offset the increased use of existing recreational facilities that are affected by the proposed subject project. With implementation of the project design features and adherence to the regulatory requirements (through the Conditions of Approval), impacts to recreation would be less than significant and not mitigation would be required. Also see Section 4.13.2 of the Draft EIR and response to A-3-8.

Comment A-3-11

The commenter states the Draft EIR fails to identify feasible mitigation measures, including measures capable of reducing the new residents' impacts on open space and existing public parks, possibly requires a revised Draft EIR that needs to be prepared to remedy the deficiencies.

Response A-3-11

Please see Responses A-3-8 and A-3-10, above. The Draft EIR adequately analyzes potential impacts to recreational resources. The commenter does not raise significant new information.

Comment A-3-12

The commenter states the parties can discuss and collaborate with representatives of the project on mitigation measures to provide the required parkland acreage or on an adequate financial contribution to offset the increased use of existing recreational facilities that are affected by the proposed subject project.

Response A-3-12

The comment is noted, the Applicant will coordinate with the CRPD to determine what parkland requirements would be met by the project with the inclusion of the Dog Park/Community Park as part of the project and Conditions of Approval applied to the project requires the Applicant to pay all required Quimby Fees to CRPD to meet the financial contribution to offset the increased use of existing recreational facilities that are affected by the proposed subject project.

Comment A-3-13

The commenter states the project fails to satisfy CEQA's requirements and may be legally inadequate and that the document must provide a degree of analysis and detail about environmental or park impacts that will enable decision-makers to make intelligent judgments in light of the environmental consequences of their decisions.

Response A-3-13

The Draft EIR included an analysis of impacts to recreation facilities that would result from the proposed project. As stated in Response A-3-10, the Draft EIR described the project design features of the proposed project related to recreation that would include public and private open space. In addition, the Applicant will coordinate with the CRPD to determine what parkland requirements would be met by the project with the inclusion of the Dog Park/Community Park as part of the project and Conditions of Approval applied to the project requires the Applicant to pay all required Quimby Fees to CRPD to meet the financial contribution to offset the increased use of existing recreational facilities that are affected by the proposed subject project. With implementation of the project design features and adherence to the regulatory requirements (through the Conditions of Approval), impacts to recreation would be less than significant and not mitigation would be required.

Conejo Recreation & Park District

Letter A-4

May 20, 2022

Carlos Contreras, Senior Planner
City of Thousand Oaks
2100 Thousand Oaks Blvd.
Thousand Oaks, CA 91362

RE: T.O. Ranch Mixed-Use and Multi-Family Residential Redevelopment Project – Conejo Recreation & Park District's DEIR Comments - Satisfaction of Park Impacts

On May 19, 2022, CRPD received written confirmation that the applicant, IMT Capital V Hampshire, LLC, intends to mitigate the Project's park impacts consistent with our comments described in our letter dated May 17, 2022, via payment of applicable park impact fees (see attached email from applicant).

With the City's inclusion of a Project condition of approval requiring the applicant to contribute applicable park impact fees, the Conejo Recreation and Park District considers impacts to park system to be fully mitigated and will allocate those fees to publicly-owned park improvements benefitting the future residents of the Project. We feel this is an appropriate and adequate CEQA response to our comments in our letter dated May 17, 2022. A-4-1

We assume the last 2 sentences in Section 6.4 on fee credits as possible park dedications in the draft Development Agreement previously provided to CRPD will be deleted. In addition, the applicant's request to waive or reduce the impacts fees associated with the affordable housing units in the Project is duly noted and will be considered. CRPD staff intends to research the matter and potentially bring a recommendation to the CRPD board in the near future. A-4-2

Please contact me if you would like any additional information. A representative from the Conejo Recreation and Park District will attend the Planning Commission meeting and be available to answer questions. A-4-3

Sincerely,

T. P. Hare
Administrator, Parks and Planning

Cc: Tom Cohen, Esq.

ADMINISTRATIVE OFFICES
403 West Hillcrest Drive, Thousand Oaks, CA 91360-4223
805-495-6471 | Fax: 805-497-3199 | parks@crpd.org | www.crpd.org

Tom Hare

From: Thomas Cohen <tcohen@cohenlanduselaw.com>
Sent: Thursday, May 19, 2022 4:49 PM
To: Tom Hare
Cc: James Friedl; Kelvin Parker; Patrick Hehir
Subject: Quimby Fees/IMT Project

Tom: On behalf of my client, IMT Capital V Hampshire, LLC, we are committed to paying Quimby fees to the CRPD for the proposed mixed-use project located at 325 and 391 Hampshire Road in line with similar projects, e.g. Caruso's the Lakes apartment project, and the 299 Thousand Oaks Boulevard mixed-use project.

Also, we respectfully request your consideration to waive Quimby fees for the 54 affordable units this project is proposing to provide to the City to help fulfill the city's need to meet its RHNA goals.

We sincerely appreciate your commitment to the parks system in our community and look forward to your response to our request.

Best,

Tom

COHEN LAND USE LAW

Thomas S. Cohen
Cohen Land Use Law
1534 N. Moorpark Road, #337
Thousand Oaks, CA 91360
tcohen@cohenlanduselaw.com
805.292.1622 | Main
805.292.9662 | Fax
805.712.1586 | Cell
www.cohenlanduselaw.com

Letter A-4

COMMENTER: Conejo Recreation and Parks District (CRPD)

DATE: May 20, 2022

Comment A-4-1

The commenter states on May 19, 2022, the agency received written confirmation that the applicant intends to mitigate the project's park impacts consistent with comment letter A-3 above, via payment of applicable park impact fees. The commenter further finds with the City's inclusion of a project condition of approval requiring the applicant to contribute applicable park impact fees, the Conejo Recreation and Park District considers impacts to park system to be fully mitigated and will allocate those fees to publicly-owned park improvements benefitting the future residents of the project. The commenter believes this is an appropriate and adequate CEQA response.

Response A-4-1

The comment is noted. This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. City of Thousand Oaks decision makers will consider all comments on the proposed project. No further response is necessary.

Comment A-4-2

The commenter states the last two sentences in Section 6.4 on fee credits as possible park dedications in the draft Development Agreement previously provided to CRPD will be deleted. In addition, the applicant's request to waive or reduce the impacts fees associated with the affordable housing units in the project is duly noted and will be considered. The commenting staff intends to research the matter and potentially bring a recommendation to the CRPD board in the near future.

Response A-4-2

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. City of Thousand Oaks decision makers will consider all comments on the proposed project. No further response is necessary.

Letter A-5

May 20, 2022

Mr. Carlos Contreras
City of Thousand Oaks
2100 Thousand Oaks Boulevard
Thousand Oaks, CA 91362
ccontreras@toaks.org

Subject: T.O. Ranch Mixed-Use Multi-Family Residential Redevelopment, Draft Environmental Impact Report, SCH No. 2021120559; Ventura County, City of Thousand Oaks

Dear Mr. Contreras:

The California Department of Fish and Wildlife (CDFW) has reviewed the City of Thousand Oaks (City) Draft Environmental Impact Report (DEIR) for the T.O. Ranch Mixed-Use Multi-Family Residential Redevelopment Plan (Project). The City, as Lead Agency, prepared a DEIR pursuant to the California Environmental Quality Act (CEQA; Pub. Resources Code, § 21000 et. seq.) with the purpose of informing decision-makers and the public regarding potential environmental effects related to the 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 or be subject to Fish and Game Code.

CDFW's Role

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust for the people of the state [Fish & Game Code, §§ 711.7, subdivision (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines, [§ 15386, subdivision (a)]. CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). CDFW is also directed to provide 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. A-5-1

CDFW is also submitting comments as a Responsible Agency under CEQA (Public 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 & Game Code, § 1600 *et seq*.). To the extent implementation of the Project as proposed may result in "take" of any species protected under the California Endangered Species Act (CESA; Fish & Game Code, § 2050 *et seq.*), or CESA-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish & Game Code, §1900 *et seq.*), CDFW recommends the Project proponent obtain appropriate authorization under the Fish and Game Code. A-5-2

Project Description and Summary

Objective: The Project as proposed will result in the redevelopment of a 10.97-acre lot in the city of Thousand Oaks. The development will include 420 residential units, 13 townhome buildings, 4 mixed-use buildings, commercial use structures, a community center, and associated above and underground parking lots. This project will require the demolition of an existing structure and the removal or encroachment of several protected trees.

Location: The Project site is located in the City of Thousand Oaks and is surrounded by scattered open space, residential, and commercial development. The Conejo Ridge and Los Padres open space spans north-west to south-west of the development.

Comments and Recommendations

CDFW offers the comments and recommendations below to assist the City in adequately identifying, avoiding, and/or mitigating significant, or potentially significant, direct and indirect impacts on fish and wildlife biological resources based on the planned activities of this proposed Project. CDFW recommends the measures below be included in a science-based monitoring program with adaptive management strategies as part of the Project's CEQA mitigation, monitoring and reporting program (Public Resources Code, § 21081.6 and CEQA Guidelines, § 15097). Additional comments or other suggestions may also be included to improve the document. A-5-3

Specific Comments

Comment #1: Impacts to Bats

Issue: The Project may impact the western mastiff bat (*Eumops perotis californicus*), pallid bat (*Antrozous pallidus*), western red bat (*Lasiurus blossevillii*), and the hoary bat (*Lasiurus cinereus*). The majority of which are Species of Special Concern (SSC).

Specific impacts: The project as proposed includes direct impacts to bats such as removal of trees, vegetation, and/or structures that may provide roosting habitat. These activities have potential to result in direct loss of bats. Species such as the pallid bat are well known to use man-made structures to roost, while the western red bat and hoary bat are a documented obligate tree roosting species. Indirect impacts to bats and roosts could result from increased noise disturbances, human activity, dust, vegetation clearing, ground disturbing activities (e.g., staging, access, excavation, grading), and vibrations caused by heavy equipment. Demolition, grading, and excavating activities may impact bats using man-made structures or surrounding trees as roost sites. A-5-4

Why impacts would occur: In urbanized areas, bats use trees and man-made structures for daytime and nighttime roosts, and forage in sources of open water such as ponds and lakes (Avila-Flores and Fenton 2005; Oprea et al. 2009; Remington and Cooper 2014). Mature riparian trees and crevices in buildings and facilities in the Project site could provide roosting habitat for bats. Modifications to roost sites can have significant impacts on the bats' usability of the roost and can impact the bats' fitness and survivability (Johnston et al. 2004). Extra noise, vibration, or the reconfiguration of large objects can lead to the disturbance of roosting bats

which may have a negative impact on the animals. Human disturbance can also lead to a change in humidity, temperatures, or the approach to a roost that could force the animals to change their mode of egress and/or ingress to a roost. Although temporary, such disturbance can lead to the abandonment of a maternity roost (Johnston et al. 2004).

Evidence impact would be significant: Bats are considered non-game mammals and are afforded protection by state law from take and/or harassment (Fish & Game Code, § 4150; Cal. Code of Regs, § 251.1). Several bat species are considered SSC and meet the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15065). Take of SSC could require a mandatory finding of significance by the City (CEQA Guidelines, § 15065).

A-5-4 cont'd

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: CDFW recommends a qualified bat specialist conduct bat roosting surveys within the Project site and a 200-foot buffer to locate potential bat roosting sites. These assessments will determine baseline conditions of potential roosting areas present throughout the study area to identify trees and/or structures (i.e., tunnels, maintenance buildings, food concession stands, comfort stations) that could provide daytime and/or nighttime roost sites.

A-5-5

Mitigation Measure #2: To prevent project delays and possible "take," CDFW also recommends nighttime emergence surveys of day roosts during seasons when bats are most mobile (April 1 to September 30). Emergence surveys should be performed shortly after dusk to identify any bats that emerge from a potential roost site. CDFW recommends using acoustic recognition technology to maximize detection of bats. In most parts of California, night roost use will only occur from spring through fall while day roosts are typically utilized during the spring, summer, and fall in California (Johnston et al. 2004).

Survey methodology and results, including negative findings, should be included in final environmental documents. Depending on survey results, please discuss potentially significant effects of the proposed Project on the bats and include species specific mitigation measures to reduce impacts to below a level of significance (CEQA Guidelines, § 15125).

A-5-6

Mitigation Measure #3: If maternity roosts are found, CDFW recommends, the following mitigation measures-

1. If maternity roosts are found, to the extent feasible, work should be scheduled between October 1 and February 28, outside of the maternity roosting season when young bats are present but are not yet ready to fly out of the roost (March 1 to September 30).

2. If maternity roosts are found and if trees and/or structures must be removed/demolished during the maternity season, a qualified bat specialist should conduct a pre-construction survey to identify those trees and/or structures proposed for disturbance that could provide hibernacula or nursery colony roosting habitat. Acoustic recognition technology should be used to maximize detection of bats. Each tree and/or structure identified as potentially supporting an active maternity roost should be closely inspected by the bat specialist no more than 7 days prior to tree and/or structure disturbance to determine the presence or absence of roosting bats more precisely. If maternity roosts are detected, trees and/or structures determined to be maternity roosts should be left in place until the

A-5-7

end of the maternity season. Work should not occur within 100 feet of or directly under or adjacent to an active roost and work should not occur between 30 minutes before sunset and 30 minutes after sunrise.

3. If bats are not detected, but the bat specialist determines that roosting bats may be present at any time of year, trees should be removed using the two-step removal method. Segments of the tree which do not offer any roosting habitat should be removed using a chainsaw. To ensure the optimum warning for any roosting bats that may still be present, trees should be pushed lightly with heavy machinery two to three times, with a pause of approximately 30 seconds between each nudge to allow bats to become active. The tree should then be left in place for at least a 24-hour period and inspected by a bat specialist. Trees that are known to be bat roosts should not be bucked or mulched immediately. A period of at least 24 hours, and preferably 48 hours, should elapse prior to such operations to allow bats to escape. Bats should be allowed to escape prior to demolition of buildings. This may be accomplished by using lights, fans, and placing one-way exclusionary devices into areas where bats are entering a building that allow bats to exit but not enter the building.

A-5-7 cont'd

Mitigation Measure #4: If presence is confirmed within the abandoned building on-site CDFW recommends humane evacuation. Humane evacuation is performed using fans, lights, one-way exclusionary devices, and other humane means to make roost sites less suitable for bats. Humane evacuation prompts bats to escape before demolition of structures and lessens the probability of direct mortality. An appropriate amount of time (4-7 nights) should be given to allow for the maximum number of individuals to escape. Additional measures can be taken to maximize survival such as partial demolition where the structure is demolished gradually, providing another opportunity for evacuation. In the absence of presence/absence data CDFW recommends a conservative approach to minimize mortality of bat species.

A-5-8

Comment #2: Impacts to Nesting Birds

Issue: The proposed Project may impact special status bird species. Buffer zones proposed for nesting passerine and raptor species within the DEIR need to be increased to reduce impacts.

Why impacts would occur: Ground clearing, and construction activities could lead to the direct mortality of a listed species or species of special concern. The loss of occupied habitat could yield a loss of foraging potential, nesting sites, roosting sites, or refugia and would constitute a significant impact if absent of appropriate mitigation.

A-5-9

Evidence impact would be significant: CDFW considers impacts to CESA-listed and SSC a significant direct and cumulative adverse effect without implementing appropriate avoidance and/or mitigation measures.

The following mitigation measures are suggested by CDFW for impacts to nesting birds:

Mitigation Measure #1: To protect passerine nesting birds that may occur on-site, CDFW recommends that no construction should occur from February 1 through September 15. If construction is unavoidable during February 1 through September 15, surveys should be conducted for nesting bird activity within 7 days prior to Project activities that occur. The surveys

A-5-10

should be conducted by a qualified biologist to determine if active bird nests of special status bird species. Surveys should occur in the construction zone and within 500 feet of the site. The nesting bird surveys should be conducted at appropriate nesting times and concentrate on potential roosting or perch sites. A-5-10 cont'd

Mitigation Measure #2: If any nests of passerine birds are observed, these nests should be designated an ecologically sensitive area and protected (while occupied) by a minimum 300-foot radius during project construction. If active nests are found, all construction must be postponed or halted until the biologist determined the nest is vacated, juveniles have fledged, and no evidence of a second nesting attempt is observed. The biologist should serve as a construction monitor during periods of construction occur near the active nest areas to ensure that no inadvertent impacts occur. A-5-11

The following mitigation measures are suggested by CDFW for impacts to raptors:

Mitigation Measure #1: To protect nesting raptors that may occur on-site, CDFW recommends that the final environmental document include a measure that no construction should occur from January 1 through September 15. If construction is unavoidable during January 1 through September 15, a qualified biologist should complete surveys for nesting bird activity the orders *Falconiformes* and *Strigiformes* (raptors and owls) within a 500-foot radius of the construction site. The nesting bird surveys should be conducted at appropriate nesting times and concentrate on potential roosting or perch sites. If any nests of birds of prey are observed, these nests should be designated an ecologically sensitive area and protected (while occupied) by a minimum 500-foot radius during project construction. Pursuant to FGC Sections 3503 and 3503.5, it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird or bird of-prey. A-5-12

Mitigation Measure #2: CDFW cannot authorize the take of any fully protected species as defined by state law. State fully protected species may not be taken or possessed at any time and no licenses or permits may be issued for its take except for collecting those species for necessary scientific research and relocation of the bird species for protection of livestock (Fish & G. Code, §§ 3511, 4700, 5050, 5515). CDFW has advised the Permittee that take of any species designated as fully protected under the Fish and Game Code is prohibited. CDFW recognizes that certain fully-protected species are documented to occur on, or in, the vicinity of the Project area, or that such species have some potential to occur on, or in, the vicinity of Project, due to the presence of suitable habitat. A-5-13

Comment #3: Spreading Invasive Pests and Diseases

Issue: CDFW is concerned that the DEIR does not describe procedures for disposal of remove trees which may be infested with invasive pests and disease.

Specific impacts: The Project proposes to remove an unspecified amount of vegetation. Improper disposal of vegetation may result in the spread of tree insect pests and disease into areas not currently exposed to these stressors. This could result in expediting the loss of oaks and other trees in California which support a high biological diversity including special status species. The environmental document should address the presence or absence of goldspotted oak borer (*Agrilus auroguttatus*), Polyphagus shot-hole borer (*Euwallacea* sp.), and thousand A-5-14

canker fungus (*Geosmithia morbida*) in on-site trees and, if present, describe how any effected trees would be disposed of as part of the Project.

Why impacts would occur: Within the DEIR Appendix C are the results of the tree surveys conducted in 2021. Within table two is a summary which grades the trees from A (outstanding)-E (dead). Of the ten trees assessed five were scored a D (poor), four scored C (average), and one scored B (above average). D scores indicate the tree is exhibiting a greater degree of disease or pest infestation that normal and appears to be in a state of decline. However, the pests/diseases identified were not given any specific mention within the document. The Project may remove tree species that could host insect pests and diseases. Trees will be removed and presumably hauled to off-site locations for disposal thereby potentially exposing off-site oak and other tree species to infestation and disease.

A-5-14 cont'd

Evidence impact would be significant: The Project may have a substantial adverse effect on any sensitive natural communities identified in local or regional plans, policies, and regulations or by the CDFW or USFWS. The Project may result in a substantial adverse effect, either directly or through habitat modifications, on species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by CDFW or USFWS that are dependent on habitats susceptible to insect and disease pathogens.

Mitigation Measure #1: CDFW recommends the City/Applicant work with the certified arborist to identify all trees and species for removal from the Project site and inspect those trees for contagious tree diseases including but not limited to: thousand canker fungus (https://thousandcankers.com/), Polyphagous shot hole borer (https://ucanr.edu/sites/eskalenlab/?file=index.html), and goldspotted oak borer (http://ipm.ucanr.edu/PMG/PESTNOTES/pn74163.html). A summary report documenting inspection methods, number and species of trees inspected, results, and conclusions, including negative findings, should be submitted to CDFW for review and included as an appendix in final environmental documents. The summary report should also include photographic documentation of entry/exit holes and evidence of pests/disease.

A-5-15

Mitigation Measure #2: If invasive pests and/or diseases are detected, the City/Applicant should provide an infectious tree disease management plan and describe how it will be implemented to avoid significant impacts under CEQA. To avoid the spread of infectious tree diseases, diseased trees should not be transported from the Project site without first being treated using best available management practices relevant for each tree disease observed. A management plan should be submitted to CDFW for review and included as an appendix in the final environmental document.

A-5-16

Comment #4: Impacts to Non-Game Mammals and Wildlife

Issue: Wildlife may still move through the Project site during the daytime or nighttime. CDFW is concerned that any wildlife potentially moving through or seeking temporary refuge on the Project site may be directly impacted during Project activities and construction. Any final fence, or other design features, design should allow for wildlife movement.

A-5-17

Specific impacts: Project activities and construction equipment may directly impact wildlife and birds moving through or seeking temporary refuge on site. This could result in wildlife and bird

mortality. Furthermore, depending on the final fencing design, the Project may cumulatively restrict wildlife movement opportunity.

Why impacts would occur: Direct impacts to wildlife may occur from: ground disturbing activities (e.g., staging, access, excavation, grading); wildlife being trapped or entangled in construction materials and erection of restrictive fencing; and wildlife could be trampled by heavy equipment operating in the Project site.

A-5-17 cont'd

Evidence impact would be significant: Mammals occurring naturally in California are considered non-game mammals and are afforded protection by State law from take and/or harassment (Fish & Game Code, § 4150; Cal. Code of Regs, § 251.1).

Recommended Potentially Feasible Mitigation Measure(s): CDFW recommends the following four mitigation measures to avoid and minimize direct impacts to wildlife during Project construction and activities.

Mitigation Measure #1: If fencing is proposed for use during construction or during the life of the Project, fences should be constructed with materials that are not harmful to wildlife. Prohibited materials include, but are not limited to, spikes, glass, razor, or barbed wire. Fencing should also be minimized so as not to restrict free wildlife movement through habitat areas. CDFW recommends the City consider permeable fencing as part of its mitigation for Project-related impacts. Wildlife impermeable fencing is fencing that prevents or creates a barrier for the passage of wildlife from one side to the other. Los Angeles County's Significant Ecological Areas Ordinance Implementation Guide (https://planning.lacounty.gov/site/sea/wp-content/uploads/2020/02/SEA-IG-2-6-20.pdf) offers additional information on permeable fencing as well as design standards. CDFW recommends reviewing those design standards.

A-5-18

Mitigation Measure #2: To avoid direct mortality, a qualified biological monitor should be on site prior to and during ground and habitat disturbing activities to move out of harm's way special status species or other wildlife of low mobility that would be injured or killed by grubbing or Project-related construction activities. Salvaged wildlife of low mobility should be removed and placed onto adjacent and suitable (i.e., species appropriate) habitat out of harm's way.

It should be noted that the temporary relocation of on-site wildlife does not constitute effective mitigation for the purposes of offsetting Program impacts associated with habitat loss.

A-5-19

Mitigation Measure #3: Grubbing and grading should be done to avoid islands of habitat where wildlife may take refuge and later be killed by heavy equipment. Grubbing and grading should be done from the center of the Project site, working outward towards adjacent habitat off site where wildlife may safely escape.

A-5-20

Additional Recommendations

Landscaping. CDFW recommends using native, drought tolerant plants when choosing landscaping pallets. Using native plants free of pesticides or herbicides will add resources to pollinators and other wildlife. CDFW also recommends ensuring California sycamores that are planted as part of mitigation are genetically tested. Hybridization has occurred with the non-native London plane (*Plantanus hispanica*), a common landscaping tree, which has put competitive stress upon the native California sycamore (*Plantus racemosa*).

A-5-21

Fuel Modification. If the Project includes fuel modification, CDFW recommends that the final environmental include avoidance and mitigation measures for any fuel modification activities conducted within and adjacent to the Project area. A weed management plan should be developed for all areas adjacent to open space that will be subject to fuel modification disturbance. CDFW also recommends that any irrigation proposed in fuel modification zones drain back into the development and not onto natural habitat land as perennial sources of water allow for the introduction of invasive Argentine ants. A-5-22

Mitigation and Monitoring Reporting Plan. Per Public Resources Code section 21081.6(a)(1), CDFW has provided the City with a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation and Monitoring Reporting Plan. A final MMRP should reflect results following additional plant and wildlife surveys and the Project's final on and/or off-site mitigation plans. A-5-23

Filing Fees

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the County and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required for the underlying Project approval to be operative, vested, and final (Cal. Code Regs., tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089). A-5-24

Conclusion

We appreciate the opportunity to comment on the Project to assist the City in adequately analyzing and minimizing/mitigating impacts to biological resources. CDFW requests an opportunity to review and comment on any response that the City has to our comments and to receive notification of any forthcoming hearing date(s) for the Project [CEQA Guidelines, § 15073(e)]. If you have any questions or comments regarding this letter, please contact Angela Castanon, Environmental Scientist, at Angela.Castanon@wildlife.ca.gov

Sincerely,

DocuSigned by:
B6E58CFE24724F5...
Erinn Wilson-Olgin
Environmental Program Manager I

EC: CDFW
Steve Gibson – Los Alamitos – Steve.Gibson@wildlife.ca.gov
Emily Galli – Fillmore – Emily.Galli@wildlife.ca.gov
Susan Howell – San Diego – Susan.Howell@wildlife.ca.gov
CEQA Program Coordinator – Sacramento – CEQACommentLetters@wildlife.ca.gov

State Clearinghouse - state.clearinghouse@opr.ca.gov

References:

Avila-Flores, R. and B.M. Fenton. 2005. Use of Spatial features by Foraging Insectivorous Bats in a Large Urban Landscape. Journal of Mammalogy 86(6):1193-1204.

Hinshaw, J.M., Holmstead, G.L., Cypher, B.L., Anderson D.C. 1998. Effects of Simulated Field Disturbance and Topsoil Salvage on Eristrium Hooveri. Accessed from: http://www.jstor.org/stable/41425279

Johnston, D., Tatarian, G., Pierson, E. 2004. California Bat Mitigation Techniques, Solutions, and Effectiveness. [Internet]. [cited 2020 June 16]. Available from: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=10334

Oprea, M., Mendes, P., Vieira, T.B., Ditchfield, A.D. 2009. Do Wooded Streets Provide Connectivity for Bats in an Urban Landscape? Biodiversity Conservation 18:2361-2371.

Remington, S and D.S. Cooper. 2014. Bat Survey of Griffith Park, Los Angeles, California. The Southwestern Naturalist 59(4):473-479.

[TCD] Thousand Cankers Disease. 2021. What is Thousand Cankers? Available from: https://thousandcankers.com/

[UCCE] UC California Cooperative Extension. 2022. Eskalen's Lab. Available from: https://ucanr.edu/sites/eskalenlab/?file=index.html

[UCIPM] UC Integrated Pest Management Program. 2021. Goldcpotted Oak Borer. Available from: http://ipm.ucanr.edu/PMG/PESTNOTES/pn74163.html

Attachment A: Draft Mitigation and Monitoring Reporting Plan

CDFW recommends the following language to be incorporated into a future environmental document for the Project. A final MMRP should reflect results following additional plant and wildlife surveys and the Project's final on and/or off-site mitigation plans.

Biological Resources (BIO)			
Mitigation Measure (MM) or Recommendation (REC)		**Timing**	**Responsible Party**
MM-BIO-1- Impacts to Bats	CDFW recommends a qualified bat specialist conduct bat roosting surveys within the Project site and a 200-foot buffer to locate potential bat roosting sites. These assessments will determine baseline conditions of potential roosting areas present throughout the study area to identify trees and/or structures (i.e., tunnels, maintenance buildings, food concession stands, comfort stations) that could provide daytime and/or nighttime roost sites.	Prior to Project construction and activities	City of Thousand Oaks/ Applicant
MM-BIO-2- Impacts to Bats	To prevent project delays and possible "take," CDFW also recommends nighttime emergence surveys of day roosts during seasons when bats are most mobile (April 1 to September 30). Emergence surveys should be performed shortly after dusk to identify any bats that emerge from a potential roost site. CDFW recommends using acoustic recognition technology to maximize detection of bats. In most parts of California, night roost use will only occur from spring through fall while day roosts are typically utilized during the spring, summer, and fall in California (Johnston et al. 2004). Survey methodology and results, including negative findings, should be included in final environmental documents. Depending	Prior to Project construction and activities	City of Thousand Oaks/ Applicant

	on survey results, please discuss potentially significant effects of the proposed Project on the bats and include species specific mitigation measures to reduce impacts to below a level of significance (CEQA Guidelines, § 15125).		
MM-BIO-3-Impacts to Bats	If maternity roosts are found, CDFW recommends, the following mitigation measures: 1. If maternity roosts are found, to the extent feasible, work should be scheduled between October 1 and February 28, outside of the maternity roosting season when young bats are present but are not yet ready to fly out of the roost (March 1 to September 30). 2. If maternity roosts are found and if trees and/or structures must be removed/demolished during the maternity season, a qualified bat specialist should conduct a pre-construction survey to identify those trees and/or structures proposed for disturbance that could provide hibernacula or nursery colony roosting habitat. Acoustic recognition technology should be used to maximize detection of bats. Each tree and/or structure identified as potentially supporting an active maternity roost should be closely inspected by the bat specialist no more than 7 days prior to tree and/or structure disturbance to determine the presence or absence of roosting bats more precisely. If maternity roosts are detected, trees and/or structures determined to be maternity roosts should be left in place until the end of the maternity season. Work should not occur within 100 feet of or directly under or adjacent to an active roost and work should not occur between 30 minutes before sunset and 30 minutes after sunrise. 3. If bats are not detected, but the bat specialist determines that roosting bats may be present at any time of year, trees	Prior to Project construction and activities	City of Thousand Oaks/ Applicant

	should be removed using the two-step removal method. Segments of the tree which do not offer any roosting habitat should be removed using a chainsaw. To ensure the optimum warning for any roosting bats that may still be present, trees should be pushed lightly with heavy machinery two to three times, with a pause of approximately 30 seconds between each nudge to allow bats to become active. The tree should then be left in place for at least a 24-hour period and inspected by a bat specialist. Trees that are known to be bat roosts should not be bucked or mulched immediately. A period of at least 24 hours, and preferably 48 hours, should elapse prior to such operations to allow bats to escape. Bats should be allowed to escape prior to demolition of buildings. This may be accomplished by using lights, fans, and placing one-way exclusionary devices into areas where bats are entering a building that allow bats to exit but not enter the building.		
MM-BIO-4-Impacts to Bats	If presence is confirmed within the abandoned building on-site CDFW recommends humane evacuation. Humane evacuation is performed using fans, lights, one-way exclusionary devices, and other humane means to make roost sites less suitable for bats. Humane evacuation allows bats to escape before demolition of structures and lessens the probability of direct mortality. An appropriate amount of time (4-7 nights) should be given to allow for the maximum number of individuals to escape. Additional measures can be taken to maximize survival such as partial demolition where the structure is demolished gradually, providing another opportunity for evacuation. In the absence of presence/absence data CDFW recommends a conservative approach to minimize mortality of bat species.	Prior to Project construction and activities	City of Thousand Oaks/ Applicant

MM-BIO-5-Impacts to Nesting Birds	To protect passerine nesting birds that may occur on-site, CDFW recommends that no construction should occur from February 1 through September 15. If construction is unavoidable during February 1 through September 15, surveys should be conducted for nesting bird activity within 7 days prior to Project activities that occur. The surveys should be conducted by a qualified biologist to determine if active bird nests of special status bird species. Surveys should occur in the construction zone and within 500 feet of the site. The nesting bird surveys should be conducted at appropriate nesting times and concentrate on potential roosting or perch sites.	Prior to Project construction and activities	City of Thousand Oaks/ Applicant
MM-BIO-6-Impacts to Nesting Birds	If any nests of passerine birds are observed, these nests should be designated an ecologically sensitive area and protected (while occupied) by a minimum 300-foot radius during project construction. If active nests are found, all construction must be postponed or halted until the biologist determined the nest is vacated, juveniles have fledged, and no evidence of a second nesting attempt is observed. The biologist should serve as a construction monitor during periods of construction occur near the active nest areas to ensure that no inadvertent impacts occur.	Prior to/ During Project construction and activities	City of Thousand Oaks/ Applicant
MM-BIO-7-Impacts to Nesting Birds	To protect nesting raptors that may occur on-site, CDFW recommends that the final environmental document include a measure that no construction should occur from January 1 through September 15. If construction is unavoidable during January 1 through September 15, a qualified biologist should complete surveys for nesting bird activity the orders *Falconiformes* and *Strigiformes* (raptors and owls) within a 500-foot radius of the construction site. The nesting bird surveys should be conducted at appropriate nesting times and concentrate on potential roosting or perch sites. If any nests of birds of prey are observed, these nests should be designated an ecologically sensitive area and protected (while occupied) by a minimum 500-foot radius during project construction. Pursuant to FGC Sections 3503 and 3503.5, it is	Prior to/ During Project construction and activities	City of Thousand Oaks/ Applicant

	unlawful to take, possess, or needlessly destroy the nest or eggs of any bird or bird-of-prey.		
MM-BIO-8-Impacts to Nesting Birds	CDFW cannot authorize the take of any fully protected species as defined by state law. State fully protected species may not be taken or possessed at any time and no licenses or permits may be issued for its take except for collecting those species for necessary scientific research and relocation of the bird species for protection of livestock (Fish & G. Code, §§ 3511, 4700, 5050, 5515). CDFW has advised the Permittee that take of any species designated as fully protected under the Fish and Game Code is prohibited. CDFW recognizes that certain fully-protected species are documented to occur on, or in, the vicinity of the Project area, or that such species have some potential to occur on, or in, the vicinity of Project, due to the presence of suitable habitat.	Prior to Project construction and activities	City of Thousand Oaks/ Applicant
MM-BIO-9-Spreading Invasive Pests and Diseases	CDFW recommends the City/Applicant work with the certified arborist to identify all trees and species for removal from the Project site and inspect those trees for contagious tree diseases including but not limited to: thousand canker fungus (https://thousandcankers.com/), Polyphagous shot hole borer (https://ucanr.edu/sites/eskalenlab/?file=index.html), and goldspotted oak borer (http://ipm.ucanr.edu/PMG/PESTNOTES/pn74163.html). A summary report documenting inspection methods, number and species of trees inspected, results, and conclusions, including negative findings, should be submitted to CDFW for review and included as an appendix in final environmental documents. The summary report should also include photographic documentation of entry/exit holes and evidence of pests/disease.	Prior to Project construction and activities	City of Thousand Oaks/ Applicant
MM-BIO-10-Spreading	If invasive pests and/or diseases are detected, the City/Applicant should provide an infectious tree disease management plan and describe how it will be implemented to avoid significant impacts under CEQA. To avoid the spread of infectious tree diseases,	Prior to Project	City of Thousand Oaks/ Applicant

Invasive Pests and Diseases	diseased trees should not be transported from the Project site without first being treated using best available management practices relevant for each tree disease observed. A management plan should be submitted to CDFW for review and included as an appendix in the final environmental document.	construction and activities	
MM-BIO-11- Impacts to Non-Game Mammals and Wildlife	If fencing is proposed for use during construction or during the life of the Project, fences should be constructed with materials that are not harmful to wildlife. Prohibited materials include, but are not limited to, spikes, glass, razor, or barbed wire. Fencing should also be minimized so as not to restrict free wildlife movement through habitat areas. Los Angeles County's Significant Ecological Areas Ordinance Implementation Guide (https://planning.lacounty.gov/site/sea/wp-content/uploads/2020/02/SEA-IG-2-6-20.pdf) offers additional information on permeable fencing as well as design standards. CDFW recommends reviewing those design standards.	Prior to Project construction and activities	City of Thousand Oaks/ Applicant
MM-BIO-12- Impacts to Non-Game Mammals and Wildlife	To avoid direct mortality, a qualified biological monitor should be on site prior to and during ground and habitat disturbing activities to move out of harm's way special status species or other wildlife of low mobility that would be injured or killed by grubbing or Project-related construction activities. Salvaged wildlife of low mobility should be removed and placed onto adjacent and suitable (i.e., species appropriate) habitat out of harm's way. It should be noted that the temporary relocation of on-site wildlife does not constitute effective mitigation for the purposes of offsetting Program impacts associated with habitat loss.	Prior to Project construction and activities	City of Thousand Oaks/ Applicant
MM-BIO-13- Impacts to Non-Game Mammals and Wildlife	Grubbing and grading should be done to avoid islands of habitat where wildlife may take refuge and later be killed by heavy equipment. Grubbing and grading should be done from the center of the Project site, working outward towards adjacent habitat off site where wildlife may safely escape.	Prior to Project construction and activities	City of Thousand Oaks/ Applicant

REC-1- Landscaping	CDFW recommends using native, drought tolerant plants when choosing landscaping pallets. Using native plants free of pesticides or herbicides will add resources to pollinators and other wildlife. CDFW also recommends ensuring California sycamores that are planted as part of mitigation are genetically tested. Hybridization has occurred with the non-native London plane (*Plantanus hispanica*), a common landscaping tree, which has put competitive stress upon the native California sycamore.	Prior to Project construction and activities	City of Thousand Oaks/ Applicant
REC-2- Fuel Modification	If the Project includes fuel modification, CDFW recommends that the final environmental include avoidance and mitigation measures for any fuel modification activities conducted within and adjacent to the Project area. A weed management plan should be developed for all areas adjacent to open space that will be subject to fuel modification disturbance. CDFW also recommends that any irrigation proposed in fuel modification zones drain back into the development and not onto natural habitat land as perennial sources of water allow for the introduction of invasive Argentine ants.	During construction and activities	City of Thousand Oaks/ Applicant
REC-3- Mitigation and Monitoring Reporting Plan	Per Public Resources Code section 21081.6(a)(1), CDFW has provided the City with a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation and Monitoring Reporting Plan. A final MMRP should reflect results following additional plant and wildlife surveys and the Project's final on and/or off-site mitigation plans.	Prior to Project construction and activities	City of Thousand Oaks/ Applicant

Letter A-5

COMMENTER: State of California Department of Fish and Wildlife (CDFW)

DATE: May 20, 2022

Comment A-5-1

The agency provides an overview of CDFW and its roles as trustee agency and responsible agency under CEQA.

Response A-5-1

This comment does not address a deficiency in the Draft EIR. This comment has been noted but no response is necessary.

Comment A-5-2

The agency states it is submitting recommendations regarding those activities involved in the project that may affect California fish and wildlife and actions for which they may have regulatory authority.

Response A-5-2

This comment does not address a deficiency in the Draft EIR. This comment has been noted but no response is necessary.

Comment A-5-3

The agency provides a summary of the proposed project and summarizes their recommendations 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. In addition, the agency refers to recommended measures or revisions in latter comments be included in a science-based monitoring program that contains adaptive management strategies as part of the project's Mitigation, Monitoring, and Reporting Program (MMRP).

Response A-5-3

Individual responses regarding the agency's concerns on environmental impacts are addressed below in Responses A-5-4 through A-5-24. A MMRP will be published with the Final EIR to assist the City in implementing the mitigation stipulated in the EIR and as reflected in Section 3, Errata to the Draft EIR. No revisions are necessary relative to this comment.

Comment A-5-4

The agency suggests that the proposed project would result in adverse impacts to western mastiff bat (*Eumops perotis californicus*), pallid bat (*Antrozous pallidus*), western red bat (*Lasiurus blossevillii*), and the hoary bat (*Lasiurus cinereus*), some of which are listed as Species of Special Concern (SSC), through removal of trees, vegetation, and/or structures that may provide roosting habitat. In addition, the agency adds that indirect impacts to bats and roosts could result from increased noise disturbances, human activity, dust, vegetation clearing, ground disturbing activities (e.g., staging, access, excavation, grading), and vibrations caused by heavy equipment. Demolition, grading, and excavating activities may impact bats using man-made structures or surrounding trees as roost sites.

Response A-5-4

This comment does not present significant new information not already analyzed in the Draft EIR concerning this species. Project impacts to special-status species, which includes roosting bats, are fully disclosed in Section 4.3, Biological Resources, of the Draft EIR on pages 4.3-2 and -3 and Impact BIO-1.

The Draft EIR states "the proposed project site provides poor habitat for roosting bat species; however, there is potential that bats could roost within the vacant buildings." The Draft EIR explains that project construction, vegetation clearing, and excavation could remove habitat or directly impact individuals (e.g., mortality) (see page 4.3-8).

Mitigation Measure (MM) BIO-1 of the Draft EIR states that "if evidence of bat roosting is observed, building demolition shall not be allowed until a qualified biologist can verify that the roost is no longer active. If necessary, bats may be evicted and the building demolished following submittal and approval of a Bat Avoidance Plan by CDFW" (see page 4.3-9 of the Draft EIR). Thus, MM BIO-1 as written is sufficient for impacts to special-status bat species and requires a CDFW-approved Bat Avoidance Plan should bats be found on the site.

Comment A-5-5

The agency's comment includes recommended mitigation measures to address impacts to roosting bats. The Agency requests a qualified bat biologist to conduct pre-construction surveys specifically to identify presence of roosting bats within 200 feet of construction be included.

Response A-5-5

Pre-construction surveys specifically to identify presence of roosting bats within 300 feet of the project is already included under MM BIO-1. The mitigation measure requires a qualified bat biologist to conduct surveys to determine the status of any roosting bats. Therefore, MM BIO-1 as written is sufficient for addressing potential impacts to roosting bats, and therefore, no additional measures or revisions are needed.

Comment A-5-6

The agency's comment includes recommended mitigation measures to address impacts to roosting bats. The Agency recommends nighttime emergence surveys of day roosts during seasons when bats are most mobile (April 1 to September 30) and additional reporting requirements.

Response A-5-6

MM BIO-1 of the Draft EIR states that "if evidence of bat roosting is observed, building demolition shall not be allowed until a qualified biologist can verify that the roost is no longer active. If necessary, bats may be evicted and the building demolished following submittal and approval of a Bat Avoidance Plan by CDFW" (see page 4.3-9 of the Draft EIR). The need for additional emergent surveys would not be necessary as any roosts would be avoided through a pre-construction survey and coordination with CDFW if a roost is observed. Thus, MM BIO-1 as written is sufficient for addressing potential impacts to special-status bat species and requires a CDFW-approved Bat Avoidance Plan should bats be found on the site.

Comment A-5-7

The agency's comment includes several recommended mitigation measures to address impacts to roosting bats, should any be found on the site.

Response A-5-7

MM BIO-1 as written is sufficient for impacts to special-status bat species and requires a CDFW-approved Bat Avoidance Plan should bats be found on the site. This comment has been noted and the recommended measures can be included in the project-specific Bat Avoidance Plan that would be approved by CDFW if bats are determined to be present. Therefore, MM BIO-1 as written is sufficient for impacts to roosting bats and no additional measures or revisions are warranted.

Comment A-5-8

The agency's comment recommends a mitigation measure related to humane eviction of roosting bats, should any be found on the site.

Response A-5-8

MM BIO-1 as written is sufficient for avoiding impacts to special-status bat species and requires a CDFW-approved Bat Avoidance Plan should bats be found on the site. This comment has been noted and the recommended measures can be included in the project-specific Bat Avoidance Plan if bats are determined to be present. Therefore, MM BIO-1 as written is sufficient for impacts to roosting bats and no additional measures or revisions are warranted.

Comment A-5-9

The agency recommends modifying MM BIO-1 by expanding the buffer zones proposed for nesting birds because ground clearing and construction activities could lead to the direct mortality of a listed species or species of special concern. The loss of occupied habitat could yield a loss of foraging potential, nesting sites, roosting sites, or refugia and would constitute a significant impact if absent of appropriate mitigation

Response A-5-9

The Draft EIR states "the ornamental landscaping on the proposed project site can support common nesting bird and raptor species, including Cooper's hawk, a CDFW "Watch List" species, that has a moderate potential to occur. Although no active or inactive nests were observed, birds may nest onsite, and passerine species, such as barn swallows (*Hirundo rustica*) and house finch (*Haemorhous mexicanus*), can nest in the eaves of the vacant structures on the site." The Draft EIR also states that "direct impacts resulting from proposed project activities conducted during the bird nesting season (typically February 1 through August 31) could include mortality during vegetation removal and building demolition" and "Direct or indirect impacts to nesting birds or roosting bats that lead to individual mortality or harassment would be considered significant" (see page 4.3-8). Moreover, the areas surrounding the project site consist of existing commercial/residential development to the north and south, Hampshire Road to the east beyond which is commercial development, and Foothill Drive to the west beyond which is undisturbed open space. Due to the disturbed condition of the project site and surrounding areas that consist of active roadways and elevated ambient noise levels that are typical of an urban environment, construction activities are not expected to result in impacts to nesting birds or raptors beyond 300 feet from the project site.

Moreover, birds and raptors that may nest within the surrounding urban environment are adapted to existing ambient noise levels and construction activities are not expected to significantly increase noise levels beyond 300 feet from the project site. Therefore, the existing bird nest survey area of 100-foot for birds and 300-foot for raptors as indicated in MM BIO-1 is adequate, and the Draft EIR adequately documents potentially significant impacts to nesting birds.

Comment A-5-10

The agency recommends modifying MM BIO-1 by extending pre-construction survey requirements from 3 days prior to initiation of ground-disturbing activities to 7 days before ground-disturbing activities and expanding the survey area to 500 feet of the site.

Response A-5-10

While the discussion of nesting birds is covered in detail in Section 4.3, *Biological Resources*, of the Draft EIR, the timing of a pre-construction nesting bird survey will be modified in Section 4.3, *Biological Resources*, as follows:

Modification of mitigation measure, page 4.3-9, *Biological Resources* at the beginning of mitigation measure BIO-1:

> Project-related activities shall occur outside of the bird breeding season (generally between ~~February 1~~ January 1 through ~~August 31~~ September 15) to the extent practicable. If construction must occur within the bird breeding season, no more than ~~three~~ seven days prior to initiation of ground-disturbing activities (including, but not limited to site preparation, grading, excavation, and trenching) within the proposed project site, a bird pre-construction bird nest survey shall be conducted by a qualified biologist within the disturbance footprint plus a 100-foot buffer (300-foot for raptors), where feasible.

See Response A-5-9 for the response regarding expanding the bird nest survey area to 500 feet from the site.

Comment A-5-11

The agency states that if any nests of passerine birds are observed, these nests should be designated an ecologically sensitive area and protected (while occupied) by a minimum 300-foot radius during project construction, whereas MM BIO-1 as currently written specifies an appropriate avoidance buffer ranging in size from 25 to 50 feet for passerines. If active nests are found, all construction must be postponed or halted until the biologist determined the nest is vacated, juveniles have fledged, and no evidence of a second nesting attempt is observed. The biologist should serve as a construction monitor during periods of construction occur near the active nest areas to ensure that no inadvertent impacts occur.

Response A-5-11

Reasonably foreseeable development adjacent to sensitive habitats, could result in potential direct and impacts through removal of trees (i.e., nesting habitat). However, the site is currently developed and surrounded by development to the north, east, and south, and by Hampshire Road to the east and Foothill Drive to the west. The trees and shrubs on the proposed project site may provide nesting habitat for birds that have adapted to urban and suburban conditions, such as (but not limited to) mourning doves (*Zenaida macroura*) and house finches (*Haemorhous mexicanus*). Moreover, the

project is a redevelopment, which would avoid nesting habitat that occur in undeveloped areas and would therefore avoid direct impacts to special-status bird species that would nest in undisturbed, native habitats.

Most of the birds anticipated to nest in the project area are common (i.e., not considered for listing, ubiquitous, and abundant) and are adapted urban environments. Thus, removal of the existing ornamental landscaping on the project site, including individual native trees, would not impact or remove important nesting habitat of special-status bird species.

In accordance with MM BIO-1, no ground disturbing activities shall occur within an established nest buffer until the biologist has confirmed that breeding/nesting is completed and the young have fledged the nest. Encroachment into the buffer shall occur only at the discretion of the qualified biologist on the basis that the encroachment will not be detrimental to an active nest. Implementation of this MM BIO-1 as currently drafted would ensure consistency with existing laws and regulations (e.g., MBTA and CFGC) and would ensure that nesting birds are not directly or indirectly impacted during construction activities.

Comment A-5-12

The agency recommends modifying MM BIO-2 by expanding the time period for bird and raptor nesting from February 1 through August 31 to January 1 through September 15. Further, the agency adds that if the project occurs between January 1 through September 15, a nesting bird, raptor, and owl survey should be conducted, prior to any ground-disturbing activities (e.g., staging, mobilization, grading) as well as prior to any vegetation removal within the project site.

Response A-5-12

While the discussion of nesting birds is covered in detail in Section 4.3, *Biological Resources*, of the Draft EIR, the timing of the typical breeding bird season will be modified in the Section 4.3, *Biological Resources*, as follows:

Modification of project impacts, page 4.3-8, *Biological Resources* at the beginning of the last paragraph:

> Direct impacts resulting from proposed project activities conducted during the bird nesting season (typically ~~February 1~~ January 1 through ~~August 31~~ September 15) could include mortality during vegetation removal and building demolition.

Modification of mitigation measure, page 4.3-9, *Biological Resources* at the beginning of mitigation measure BIO-1:

> Project-related activities shall occur outside of the bird breeding season (generally between ~~February 1~~ January 1 through ~~August 31~~ September 15) to the extent practicable. If construction must occur within the bird breeding season, no more than ~~three~~ seven days prior to initiation of ground-disturbing activities (including, but not limited to site preparation, grading, excavation, and trenching) within the proposed project site, a bird pre-construction bird nest survey shall be conducted by a qualified biologist within the disturbance footprint plus a 100-foot buffer (300-foot for raptors), where feasible.

Comment A-5-13

The agency states that it cannot authorize the take of any fully protected species as defined by state law and it recognizes that certain fully-protected species are documented to occur on, or in, the vicinity of the Project area, or that such species have some potential to occur on, or in, the vicinity of Project, due to the presence of suitable habitat.

Response A-5-13

This comment does not present significant new information not already analyzed in the Draft EIR concerning special-status species. Project impacts to special-status species are fully disclosed in Section 4.3, Biological Resources, of the Draft EIR under Impact BIO-1 and Impact BIO-4.

Comment A-5-14

The agency states the project may remove trees and can possibly spread material infected with invasive tree diseases, pests, and pathogens and recommends measures to mitigate the spread of invasive pests and diseases.

Response A-5-14

According to the City's Oak Tree Preservation and Protection Standards and Guidelines, and Landmark Tree Ordinance, an Oak/Landmark Tree Permit is required for removal, relocation, or encroachment into the tree protection zone of an oak tree or landmark tree. Protected oaks and landmark tree removals are mitigated at the discretion of the City in accordance with the City of Thousand Oaks Municipal Code, Article 42. Oak Tree Preservation and Protection (Section 9-4.4307). Conditions on removal) and Article 43. Landmark Tree Preservation and Protection (Section 9-4.4306). Conditions on removal), respectively, that includes, but not limited to: (a) replacement or placement of additional trees on the subject property to offset the impacts associated with the loss of a tree, limbs, or encroachment into the protected zone of a landmark tree; (b) relocating of a tree onsite or offsite, or the planting of a new tree offsite to offset the loss of a tree; (c) requiring an objectively observable maintenance and care program to insure the continued health and care of landmark trees on the property; (d) payment of a fee or donation of a boxed tree to the City or other public agency to be used elsewhere in the community should a suitable replacement location of the tree not be possible onsite or offsite (Draft EIR, page 4.3-6). According to the Oak and Landmark Tree Report (Rincon, March 2022), no invasive diseases, pests or pathogens were observed on the trees that were surveyed. Nevertheless, to ensure that diseases, pests, or pathogens are not transported offsite following the removal of protected trees on the project site, MM BIO-2 has been revised to require that an arborist conducts an inspection of diseases, pests or pathogens prior to protected tree removal and any infected trees be disposed using best available management practices relevant for each tree disease observed.

While the discussion of protected trees is covered in detail in Section 4.3, *Biological Resources*, of the Draft EIR, a discussion of additional pre-construction survey requirements will be added to the Section 4.3, *Biological Resources*, as follows:

Insertion into mitigation measure, page 4.3-11, *Biological Resources* at the beginning of mitigation measure BIO-2:

> <u>An arborist shall conduct an inspection of diseases, pests or pathogens prior to protected tree removal and any infected trees be disposed using best available management practices relevant for each tree disease observed.</u>

Comment A-5-15

The agency recommends the City/Applicant work with the certified arborist to identify all trees and species for removal from the Project site and inspect those trees for contagious tree diseases. The agency further recommends that a summary report documenting inspection methods, number and species of trees inspected, results, and conclusions, including negative findings, should be submitted to CDFW for review and included as an appendix in final environmental documents.

Response A-5-15

This comment has been noted. According to the Oak and Landmark Tree Report (Rincon, March 2022), no invasive diseases, pests or pathogens were observed on the trees that were surveyed. Project impacts to protected trees are fully disclosed in Section 4.3, Biological Resources, of the Draft EIR under Impact BIO-5 and no additional measures are warranted. See Response A-5-14 for the response regarding an inspection of diseases, pests, or pathogens prior to protected tree removal.

Comment A-5-16

The agency states that if invasive pests and/or diseases are detected, the City/Applicant should provide an infectious tree disease management plan and describe how it will be implemented to avoid significant impacts under CEQA. The agency adds that to avoid the spread of infectious tree diseases, diseased trees should not be transported from the project site without first being treated using best available management practices relevant for each tree disease observed. CDFW has also recommended that a management plan be submitted to CDFW for review and included as an appendix in the final environmental document.

Response A-5-16

This comment has been noted. According to the Oak and Landmark Tree Report (Rincon, March 2022), no invasive diseases, pests or pathogens were observed on the trees that were surveyed. Project impacts to protected trees are fully disclosed in Section 4.3, Biological Resources, of the Draft EIR under Impact BIO-5 and no additional measures are warranted. See Response A-5-14 for the response regarding an inspection of diseases, pests, or pathogens prior to protected tree removal.

Comment A-5-17

The commenter states that wildlife may still move through the project site during the daytime or nighttime. The commenter states concern that any wildlife potentially moving through or seeking temporary refuge on the project site may be directly impacted during project activities and construction. Any final fence, or other design features, design should allow for wildlife movement.

Response A-5-17

No impacts to wildlife movement corridors are expected to occur (refer to page 4.3-10). The highly developed proposed project site and surrounding development properties and city right of way constitutes a small area lacking suitable habitats, dense foliage cover, and vegetation communities to serve a wildlife nursery site or substantially contribute to wildlife movement or corridors. Moreover, the project site is not within a wildlife movement corridor. Wildlife presence is generally limited to avian species because the proposed project site and surrounding areas are developed; however, it is conceivable that common reptiles such as western fence lizard (*Sceloporus occidentalis*) and urban-adapted mammals such as (*Otospermophilus beecheyi*) may be found on the disturbed, steep

downward slope at the western boundary of the site. That said, the terrestrial wildlife that have the potential to occur are not migratory species and are not using the project site as a movement corridor.

As described on page ES-5 of the Draft EIR, prior to commencement of grading operations, the project site would be secured with construction fencing that would remain in-place throughout the entire construction process. The construction fence would limit access to the site for larger urban species, including coyote, bobcat, and other predatory species that may occur in the vicinity of the project (i.e., areas to the north of Foothill Road.) Therefore, the proposed project would have no impact to wildlife movement and no additional mitigation measures are warranted for project construction.

Comment A-5-18

The commenter recommends additional mitigation measures if fencing is proposed for use during construction or during the life of the Project. The agency recommends fences be constructed with materials that are not harmful to wildlife. CDFW asserts that prohibited fencing materials include, but are not limited to, spikes, glass, razor, or barbed wire. Fencing should also be minimized so as not to restrict free wildlife movement through habitat areas. CDFW recommends the City consider permeable fencing as part of its mitigation for Project-related impacts.

Response A-5-18

The comment is noted. No impacts to wildlife movement are expected to occur (refer to page 4.3-10). While some urban species may be present, the proposed project site and vegetation on the surrounding parcels are generally limited to ornamental trees and shrubs, some of which are native trees, and the adjacent open space to the west of Foothill Drive is composed of non-native and native shrubs and trees, that can support common nesting bird species. Operation of the proposed project would be consistent with current conditions and would not present new impacts to wildlife that may occur on adjacent parcels.

Comment A-5-19

The commenter recommends a qualified biological monitor be on site prior to and during ground and habitat disturbing activities to move out of harm's way special status species or other wildlife of low mobility that would be injured or killed by grubbing or Project-related construction activities.

Response A-5-19

The comment is noted. The project site is developed, and aside from existing landscaping planters, consists of pavement and structures that include a parking lot and an existing building that will be demolished. Few terrestrial wildlife species are expected to be present; therefore, no impacts to wildlife are expected to occur (refer to Draft EIR page 4.3-10). The Contractor shall be responsible for compliance with all applicable local, state, and federal laws, ordinances, and policies to protect biological resources during construction of the project.

Comment A-5-20

The commenter states that grubbing and grading should be done to avoid islands of habitat where wildlife may take refuge and later be killed by heavy equipment. Grubbing and grading should be done from the center of the Project site, working outward towards adjacent habitat off site where wildlife may safely escape.

Response A-5-20

The comment is noted. The project site is developed, and aside from existing landscaping planters, consists of pavement and structures that include a parking lot and an existing building that will be demolished. Few terrestrial wildlife species are expected to be present; therefore, no impacts to wildlife are expected to occur (refer to Draft EIR page 4.3-10). The Contractor shall be responsible for compliance with all applicable local, state, and federal laws, ordinances, and policies to protect biological resources during construction of the project.

Comment A-5-21

The commenter recommends using native, drought tolerant plants when choosing landscaping pallets and states because the project includes fuel modification, that the final environmental include avoidance and mitigation measures for any fuel modification activities conducted within and adjacent to the project area.

Response A-5-21

This comment does not address a deficiency in the Draft EIR. As described in the Draft EIR, landscaping would be compatible with the landscape character of Thousand Oaks and include shade trees, other drought-tolerant plantings, and decorative paving (page 4.1-16).This comment has been noted but no response is necessary.

Comment A-5-22

The agency recommends that the final EIR include avoidance and mitigation measures for any fuel modification activities conducted within and adjacent to the Project area. A weed management plan should be developed for all areas adjacent to open space. CDFW also recommends that any irrigation proposed in fuel modification zones drain back into the development and not onto natural habitat land as perennial sources of water allow for the introduction of invasive Argentine ants.

Response A-5-22

The comment is noted. As described on page 4.9-9, Redevelopment of the site would construct infill residential and new commercial uses along with internal public, communal, and private open space with pedestrian walkways that connect to nearby open space trails. Development would not encroach upon or otherwise impact open space resources or necessitate vegetation to be cleared or thinned within the open space area to the west that is beyond Foothill Drive. Onsite landscaping would be maintained and would provide increased fuel modification in the area without impairing access to nearby open space to the west. In addition, the project would include low-flow plumbing features and fittings, as well as drought resistant landscaping and efficient drip irrigation in accordance with the City's Landscaping requirements for new development projects.

Comment A-5-23

The agency provides a summary of the proposed project and summarizes their recommendations 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. In addition, the agency refers to recommended measures or revisions in latter comments be included in a science-based monitoring program that contains adaptive management strategies as part of the project's Mitigation, Monitoring, and Reporting Program (MMRP).

Response A-5-23

Individual responses regarding the agency's concerns on environmental impacts are addressed above in Responses A-5-1 through A-5-18. A MMRP will be published with the Final EIR to assist the City in implementing the mitigation stipulated in the EIR and as reflected in Section 3, Errata to the Draft EIR. No revisions are necessary relative to this comment.

Comment A-5-24

The agency summarizes the CDFW filing fee requirements and requests notification of future public hearings on the project.

Response A-5-24

The development project is required by law to pay all appropriate CDFW filing fees, and the City will notify the agency of future public hearings on any such project.

DEPARTMENT OF TRANSPORTATION
DISTRICT 7
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 269-1124
FAX (213) 897-1337
TTY 711
www.dot.ca.gov

Letter A-6

Making Conservation
a California Way of Life

May 20, 2022

Carlos Contreras, Senior Planner
Community Development Department
Planning Division
2100 Thousand Oaks Boulevard
Thousand Oaks, CA 91362

RE: T.O. Ranch Mixed-Use and Multi-Family
Residential Redevelopment
SCH # 2021120559
Vic. VEN-101/PM 1.64
GTS # VEN-2022-00481-DEIR

Dear Carlos Contreras:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced environmental document. The proposed project would include an overall 841,153 square foot (sf) redevelopment site with 420 residential units, 15,000 sf. of commercial uses, parking, and 203,172 sf of open space and amenities including pedestrian trails, pocket park, dog park, streetscapes, retail and dining plazas, street front terraces, seating areas, and gathering spaces. The project also includes surface parking and two subterranean parking structures comprised of 119 commercial parking spaces and 683 residential parking spaces. The proposed project would also include a 5,000 sf two-story stand-alone amenity structure which would include seating areas and patios, a barbeque picnic area, and a pool.

The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. Senate Bill 743 (2013) has codified into CEQA law and mandated that CEQA review of transportation impacts of proposed development be modified by using Vehicle Miles Traveled (VMT) as the primary metric in identifying transportation impacts for all future development projects. You may reference the Governor's Office of Planning and Research (OPR) for more information:

A-6-1

http://opr.ca.gov/ceqa/updates/guidelines/

As a reminder, VMT is the standard transportation analysis metric in CEQA for land use projects after July 1, 2020, which is the statewide implementation date. A-6-1 cont'd

Caltrans is aware of challenges that the region faces in identifying viable solutions to alleviating congestion on State and Local facilities. With limited room to expand vehicular capacity, all future developments should incorporate multi-modal and complete streets transportation elements that will actively promote alternatives to car use and better manage existing parking assets. Prioritizing and allocating space to efficient modes of travel such as bicycling and public transit can allow streets to transport more people in a fixed amount of right-of-way. A-6-2

Caltrans supports the implementation of complete streets and pedestrian safety measures such as road diets and other traffic calming measures. Please note the Federal Highway Administration (FHWA) recognizes the road diet treatment as a proven safety countermeasure, and the cost of a road diet can be significantly reduced if implemented in tandem with routine street resurfacing. A-6-3

Overall, the environmental report should ensure all modes are served well by planning and development activities. This includes reducing single occupancy vehicle trips, ensuring safety, reducing vehicle miles traveled, supporting accessibility, and reducing greenhouse gas emissions. A-6-4

VMT

The project TAZ's daily residential VMT per capita (10.87) is 29% below the citywide average (15.31). Based on the thresholds of significance, the proposed project would not result in a significant transportation impact. Given the above finding of less than significant Project VMT impact, the identification of mitigation measures is not required at this time. However, a post-development VMT analysis with all mitigation measures should be prepared for monitoring purpose and for future project thresholds in the area. Additional mitigation measure should be considered and implemented when the post-development VMT analysis discloses any traffic significant impact. A-6-5

Pedestrian and Bicycle

The proposed project would cluster development to promote walking; integrate a pedestrian-friendly public realm where residents have access to commercial services and open space within biking and walking distance; and, support walking and/or biking to nearby medical services and an existing jobs center. Additionally, the proposed project would be located within a half-mile of an LADOT Transit Commuter Express Route 422 bus stop, which would promote the use of public transit to access Central Los Angeles, Hollywood, San Fernando Valley, and Agoura Hills. A-6-6

The proposed project would provide direct access to the Los Robles trailhead, which connects to the Los Robles Trail and Open Space system. The Los Robles Trail and Open Space system is a ridgeline trail system that provides approximately 25 miles of A-6-7

contiguous trails and traverses several open space areas, encompassing close to 2,000 acres. The system can be enjoyed by hikers, bikers, and equestrians. A-6-7 cont'd

The proposed project would cluster development to promote walking by integrating a pedestrian-friendly public realm where residents have access to commercial services and open space within biking and walking distance. The project supports walking and/or biking to nearby medical services and existing jobs centers. Additionally, the proposed project would provide ample on-site open space and incorporate native plant species to create a unique pedestrian environment. A-6-8

Transit

The nearest bus stop to the proposed project is located at the intersection of Hampshire Road and Townsgate Road, approximately 475 feet south of the project site, serviced by Commuter Express 422 (LADOT 2022a). Another nearby bus stop is located at the intersection of Thousand Oaks Boulevard and Skyline Drive, approximately 0.5 mile north of the project site, serviced by TOT Route 43, which covers Thousand Oaks Boulevard and Westlake areas (City of Thousand Oaks 2022b). The main loading and unloading zones for the transit areas are located at the southeast corner of the project site near the intersection of Hampshire Road and Thousand Oaks Boulevard. A-6-9

Others

Storm water run-off is a sensitive issue for Los Angeles and Ventura counties. Please be mindful that projects should be designed to discharge clean run-off water. Additionally, discharge of storm water run-off is not permitted onto State highway facilities without any storm water management plan. A-6-10

As a reminder, 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. We recommend large size truck trips be limited to off-peak commute periods. A-6-11

If you have any questions, please feel free to contact Mr. Alan Lin the project coordinator at (213) 269-1124 and refer to GTS # VEN-2022-00481-DEIR.

Sincerely,

Miya Edmonson

MIYA EDMONSON
LDR/CEQA Branch Chief

email: State Clearinghouse

Letter A-6

COMMENTER: State of California – Department of Transportation District 7 (Caltrans)

DATE: May 20, 2022

Comment A-6-1

The commenter states that the mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respect the environment. Senate Bill 743 (2013) has codified into CEQA law and mandated that CEQA review of transportation impacts of proposed development be modified by using vehicle miles traveled (VMT) as the primary metric in identifying transportation impacts for all future development projects.

Response A-6-1

The proposed project properly analyzes the VMT standards for the proposed project and implements VMT as the standard transportation analysis metric for CEQA purposes. Please see Section 4.14, *Transportation* of the Draft EIR.

Comment A-6-2

The commenter states challenges that the region faces in identifying viable solutions to alleviating congestion on State and local facilities.

Response A-6-2

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. However, the proposed project has been designed to provide a pedestrian oriented development with a mix of uses in one central location, to lessen the likelihood of multiple car trips for everyday services. The project site is also located near multiple bus stop locations for access to public transit.

Comment A-6-3

The commenter states that Caltrans supports the implementation of complete streets and pedestrian safety measures such as road diets and other traffic calming measures.

Response A-6-3

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. However, the proposed project includes road diet treatments in order to reduce routine street resurfacing and provide safety improvements.

Comment A-6-4

The commenter states that the EIR should ensure all modes are served well by planning and development activities.

Response A-6-4

As stated in Section 4.14, *Transportation* of the Draft EIR, the project provides multiple uses and is designed to reduce single occupancy vehicle trips by having multiple uses in one singular place. This avoids the need for multiple trips for everyday chores and tasks. The project implements greenhouse gas emissions reduction measures by encouraging pedestrian activity and access to public transit in order to reduce VMT.

Comment A-6-5

The commenter states the project TAZ's daily residential VMT per capita (10.87) is 29% below the citywide average (15.31). Based on the thresholds of significance, the proposed project would not result in a significant transportation impact. Given the above finding of less than significant project VMT impact, the identification of mitigation measures is not required at this time. The commenter states a post-development VMT analysis with all mitigation measures should be prepared for monitoring purpose and for future project thresholds in the area. Further, the commenter states additional mitigation measure should be considered and implemented when the post-development VMT analysis discloses any traffic significant impact.

Response A-6-5

The comment regarding the finding of less than significant Project VMT impact and the acknowledgment that mitigation measures are not required at this time is noted. Further, concerning post-development mitigation measure request, without clear potential impacts due to increases in VMT from the project post-development, future mitigation measure development is speculative and thus, the City would not be able to develop clear performance standards to mitigate a potential future significant effect.

Comment A-6-6

The commenter states the proposed project would cluster development to promote walking; integrate a pedestrian-friendly public realm where residents have access to commercial services and open space within biking and walking distance; and support walking and/or biking to nearby medical services and an existing jobs center

Response A-6-6

The comment is noted.

Comment A-6-7

The commenter states that the proposed project would provide direct access to the Los Robles trailhead, which connects to the Los Robles Trail and Open Space system.

Response A-6-7

The comment is noted; the project site is located approximately 200 feet to the northwest of the Los Robles Trail Head. As such, the project site is accessible to the to the Los Robles Trail and Open Space system, which is a ridgeline trail system that provides approximately 25 miles of contiguous trails and traverses several open space areas, encompassing close to 2,000 acres. The system can be enjoyed by hikers, bikers, and equestrians.

Comment A-6-8

The commenter states that the proposed project would cluster development to promote walking by integrating a pedestrian-friendly public realm where residents have access to commercial services and open space within biking and walking distance.

Response A-6-8

The comment is noted; the proposed project also supports walking and/or biking to nearby medical services and existing jobs centers. Additionally, the proposed project would provide ample on-site open space and incorporate native plant species to create a unique pedestrian environment.

Comment A-6-9

The commenter states that the nearest bus stop to the proposed project is located at the intersection of Hampshire Road and Townsgate Road, approximately 475 feet south of the project site, serviced by Commuter Express 422 (LADOT 2022a).

Response A-6-9

The comment is noted.

Section 4.14, *Transportation* of the Draft EIR, the following revisions have been made regarding transit:

The nearest bus stop to the proposed project is located ~~at the intersection of Hampshire Road and Thousand Oaks Boulevard, 0.4 mile northeast of the site, serviced by Commuter Express 422.~~ on the corner of Hampshire Road and Foothill Drive adjacent to the project site, serviced by Commuter Express 423. ~~Another~~ Other nearby bus stops ~~is~~ are located at the intersection of Hampshire Road and Thousand Oaks Boulevard, 0.4 mile northeast of the site, serviced by Commuter Express 422, and at the intersection of Duesenberg Drive and Thousand Oaks Boulevard, 0.8 mile northeast, serviced by TOT Route 43. Route 43 covers Thousand Oaks Boulevard and Westlake areas.

Comment A-6-10

The commenter states that projects should be designed to discharge clean run-off water. Additionally, discharge of storm water run-off is not permitted onto State highway facilities without any storm water management plan.

Response A-6-10

As discussed in Section 4.17.2, *Hydrology and Water Quality*, of the Draft EIR, the proposed project would comply with MS4 permits and best management practices to ensure all water is captured onsite. Conditions of approval have been applied to the project requiring applicant to meet MS4 Stormwater Retention Requirements. Also, a storm water management plan will be prepared and submitted to the City during plan check review.

Comment A-6-11

The commenter states that 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. We recommend large size truck trips be limited to off-peak commute periods.

Response A-6-11

The comment is noted. The proposed project will adhere to the Caltrans permit process and obtain a transportation permit if oversized vehicles are used on the State highways during project construction. Large size trucks will also be limited to off-peak commute periods as applicable.

Ventura County
Air Pollution
Control District

4567 Telephone Rd
Ventura, California 93003

tel 805/303-4005
fax 805/456-7797
www.vcapcd.org

Ali Reza Ghasemi, PE
Interim
Air Pollution Control Officer

VENTURA COUNTY
AIR POLLUTION CONTROL DISTRICT
Memorandum

Letter A-7

TO: Carlos Contreras, City of Thousand Oaks DATE: May 23, 2022

FROM: Nicole Collazo, Air Quality Specialist, VCAPCD Planning Division

SUBJECT: Thousand Oaks (T.O.) Ranch Mixed-Use and Multi-Family Residential Redevelopment Project Public Comment (RMA 22-005)

Ventura County Air Pollution Control District (APCD) staff has reviewed the subject Draft Environmental Impact Report (DEIR) for the Thousand Oaks Ranch Mixed-Use and Multi-Family Residential Redevelopment project (project). The project overall 841,153 square foot (sf) redevelopment site with 420 residential units, 15,000 sf. of commercial uses, parking, and 203,172 sf of open space and amenities including pedestrian trails, pocket park, dog park, streetscapes, retail and dining plazas, street front terraces, seating areas, and gathering spaces. The project also includes surface parking and two subterranean parking structures comprised of 119 commercial parking spaces and 683 residential parking spaces. Of the total 420 residential units, 50 units would be set aside for deed restricted low-Income households. The project location is located at 325 and 391 Hampshire Road. The Lead Agency for the project is the City of Thousand Oaks.

General Comments

APCD submits the following comments based on the DEIR available for public review for the Air Quality environmental impact section.

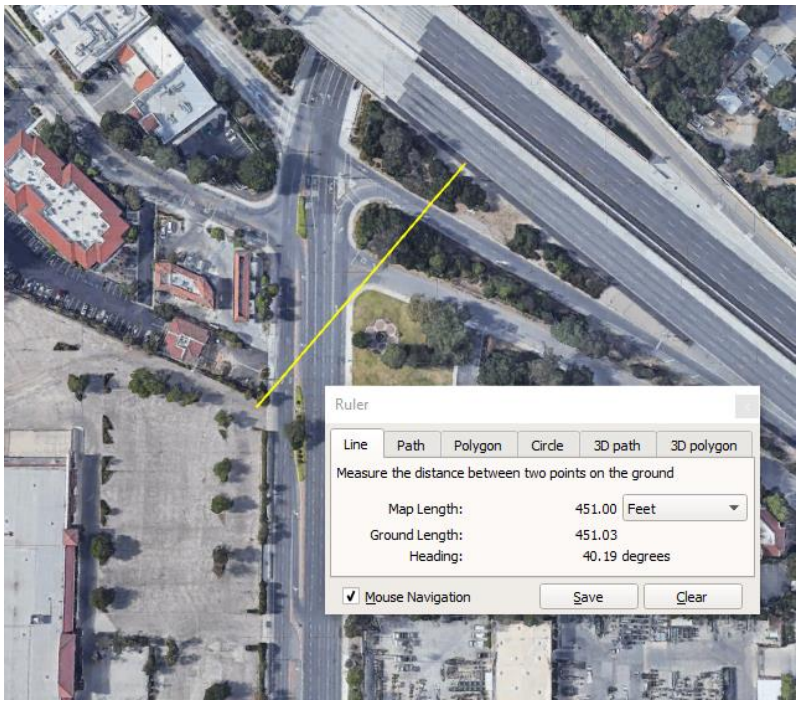
1) *Page 4.2-11. Local Regulations*. Rule 74.2's general non-flat and flat coatings maximum ROC content is now 50 g/L, which went into effect on July 1, 2021. In addition to the APCD rules listed, the project demolition activities must also comply with Rule 62.7, *Asbestos- Demolition and Renovation.* A-7-1

2) *Page 4.2-14. Methodology- Construction*. If incorporating Tier 4 off-road construction equipment as part of the project design and to ensure the project does not create a significant air quality impact per CEQA, we recommend this feature becomes enforceable as a standard condition of approval for discretionary permit, condition under the grading permit, and/or some other means to enforce this project design feature. A-7-2

3) *Page 4.2-18. Table 4.2-6.* It is not clear whether the mobile operational emissions modeled took into account the proposed 10-30% on-site electric vehicle charging stations (DEIR, Page 4.5-11). A-7-3

4) *Page 4.2-19. Toxic Air Contaminants (TAC)*. An additional toxic air contaminant that needs to be disclosed is potential asbestos exposure from the proposed demolition activities. A-7-4

5) *Page 4.2-20. Toxic Air Contaminants (TAC).* An toxics engineering analysis reviewed the construction-based Health Risk Assessment (HRA) and found it to be satisfactory in its assumptions and methodoogy. However, the DEIR states that an HRA to determine the project's toxic impacts from proximity to the U.S. 101 freeway, a potential source of TACs, was not performed due to the project being located 510 feet away from the freeway. An aerial view of the project using site plans in the DEIR indicates an approximate distance of 450 feet from the northeastern most boundary directly straight towards the 101 freeway (see aerial photo below). A-7-5



The California Air Resources Board (CARB) recommends avoiding siting sensitive land uses within 500 feet of a freeway, urban roads with 100,000 vehicles/day due to the respiratory health effects of diesel particulate matter (DPM). "In addition to the respiratory health effects in children, proximity to freeways increases potential cancer risk and contributes to total particulate matter exposure. There are three carcinogenic toxic air contaminants that constitute the majority of the known health risk from motor vehicle traffic – diesel particulate matter (diesel PM) from trucks, and benzene and 1,3-butadiene from passenger vehicles. On a typical urban freeway (truck traffic of 10,000-20,000/day), diesel PM represents about 70 percent of the potential cancer risk from the vehicle traffic. Diesel particulate emissions are also of special concern because health studies show an association between particulate matter and premature mortality in those with existing cardiovascular disease." (*CARB 2005 Air Quality and Land Use Handbook*,

Page 8). The Handbook also recommends avoiding siting new sensitive land uses within 300 feet of a large gas station (defined as a facility with a throughput of 3.6 million gallons per year or greater) and recommends a 50-foot separation from all gas stations (*CARB 2005 Air Quality and Land Use Handbook*, Tables 1-1, 1-2). The project is adjacent to gasoline dispensing stations on both the north and south side.

A-7-5 cont'd

While we note that the CARB guidance is advisory and lead agencies must factor other considerations, including housing and transportation needs, APCD would recommend at a minimum an HRA be performed for disclosure purposes of any potential toxic impacts the U.S. 101 freeway will have on the proposed project.

If toxic impacts are found to be over the thresholds established by the California Office of environmental Health Hazard Assessment (OEHHA), we recommend the following mitigation measures:

- locating the air intakes farthest away from source of toxic contaminants (southern boundaries)
- weatherproofing all windows (residential and commercial)
- limiting window opening capability for units along northern boundary

The project already includes the following project design features, which are additional mitigation measures APCD would recommend to mitigate toxic impacts from roadways:

- installation of heating ventilation and air condition (HVAC) system
- installation of MERV 13 standard air filtration for residential units
- installation of vegetative barrier along perimeter of project

APCD submitted comments for the Notice of Preparation on January 31, 2022 for the project (DEIR Appendix A, PDF Page 280) which included a recommendation to perform an HRA due to proximity of the U.S. 101 freeway (Comment #4). A copy is enclosed for reference.

Thank you for the opportunity to comment on the project. If you have any questions, you may contact me at nicole@vcapcd.org.

Ventura County
Air Pollution
Control District

4567 Telephone Rd
Ventura, California 93003

tel 805/303-4005
fax 805/456-7797
www.vcapcd.org

Dr. Laki Tisopulos, P.E.
Air Pollution Control Officer

VENTURA COUNTY
AIR POLLUTION CONTROL DISTRICT
Memorandum

TO: Carlos Contreras, Senior Planner, City of Thousand Oaks

DATE: January 31, 2022

FROM: Nicole Collazo, Air Quality Specialist, VCAPCD Planning Division

SUBJECT: Notice of Preparation of a Draft Environmental Impact Report for the City of Thousand Oaks Hampshire Road Mixed Use Project

Air Pollution Control District (APCD) staff has reviewed the subject Notice of Preparation (NOP) for the draft environmental impact report (DEIR), which will analyze the environmental impacts of a project to renovate an existing site for a mixed-use residential and commercial space. The project is located at 325 and 391 Hampshire Road. The Lead Agency is the City of Thousand Oaks.

APCD has the following comments regarding the project's NOP of a DEIR.

General Comments

1) *Air Quality Section*- The air quality assessment should consider project consistency with the 2016 Air Quality Management Plan (AQMP). The 2016 AQMP presents Ventura County's strategy (including related mandated elements) to attain the 2008 federal 8-hour ozone standard by 2020, as required by the federal Clean Air Act Amendments of 1990 and applicable U.S. EPA clean air regulations. The 2016 AQMP uses an updated 2012 emissions inventory as baseline for forecasting data, SCAG RTP 2016 data, and CARB's EMFAC2014 emission factors for mobile sources. The AQMP can be downloaded from our website at http://www.vcapcd.org/AQMP-2016.htm. A-7-6

2) The Ventura County Air Quality Assessment Guidelines (AQAG) is recommended to evaluate all potential air quality impacts. The AQAG are also downloadable from our website here: http://www.vcapcd.org/environmental-review.htm. Specifically, the air quality assessment should consider reactive organic compound, nitrogen oxide emissions and particulate matter from all project-related motor vehicles, sources not permitted with APCD, and construction equipment that may result from potential buildout, as appropriate to future development policies and implementation measures. We note that the AQAG has not been updated since 2003 and serves as a reference and is not required or mandated by the APCD (AQAG, Page 1-1). Current air quality determinations follow the same methodology but using different tools (CalEEMod vs. URBEMIS, updated OEHHA standards for toxics). The recommended list of mitigation A-7-7

measures in the AQAG are also limited and outdated. More innovative solutions exist rather than contributing to a TDM Fund Mitigation, such as installing bicycle lockers, EV charging stations, energy standards exceeding Title 24, etc. For example, the following template is currently being recommended by APCD as a Commenting Agency for projects that include construction equipment, reflecting state laws adopted since the AQAG was last updated in 2003:

A-7-7 cont'd

Construction Equipment

Purpose: In order to ensure that ozone precursor and particulate emissions from diesel-powered mobile construction equipment are reduced to the greatest amount feasible.
Requirement: The Permittee shall comply with the provisions of all applicable California State Laws and APCD Rules and Regulations regarding portable construction equipment and construction vehicles.
Documentation: The project applicant shall ensure compliance with the following State Laws and APCD requirements:

I. Construction equipment shall not have visible emissions greater than 20% opacity, as required by APCD Rule 50, Opacity.

II. All portable diesel-powered equipment over 50 BHP shall be registered with the State's Portable Equipment Registration Program (PERP) or an APCD Portable Permit.

III. Off-Road Heavy-Duty trucks shall comply with the California State Regulation for In-Use Off-Road Diesel Vehicles (Title 13, CCR §2449), the purpose of which is to reduce NO_x and diesel particulate matter exhaust emissions.

IV. On-Road Heavy-Duty trucks shall comply with the California State Regulation for In-Use On-Road Diesel Vehicles (Title 13, CCR §2025), the purpose of which is to reduce NO_x and diesel particulate matter exhaust emissions.

V. All commercial on-road and off-road diesel vehicles are subject to the idling limits of Title 13, CCR §2485, §2449(d)(3), respectively. Construction equipment shall not idle for more than five (5) consecutive minutes. The idling limit does not apply to: (1) idling when queuing; (2) idling to verify that the vehicle is in safe operating condition; (3) idling for testing, servicing, repairing or diagnostic purposes; (4) idling necessary to accomplish work for which the vehicle was designed (such as operating a crane); (5) idling required to bring the machine system to operating temperature, and (6) idling necessary to ensure safe operation of the vehicle. It is the Permittee's responsibility to have a written idling policy that is made available to operators of the vehicles and equipment and informs them that idling is limited to 5 consecutive minutes or less, except as exempted in subsection a. above.

The following are recommended emission reduction measures for construction equipment and vehicles:

I. Diesel powered equipment should be replaced by electric equipment whenever feasible.

II. Maintain equipment engines in good condition and in proper tune as per manufacturer's specifications.

III. Lengthen the construction period during smog season (May through October), to minimize the number of vehicles and equipment operating at the same time.

IV. Use alternatively fueled construction equipment, such as compressed natural gas (CNG), liquefied natural gas (LNG), or electric, if feasible.

V. Use of Tier 3 and Tier 4 off-road construction equipment shall be used, if feasible. A-7-7 cont'd

3) It is important to quantify construction emissions, although they are temporary and short-term in nature and not included in the impact determination for attaining the ambient air quality standards for ozone. Construction is proposed to occur for 21-29 months, which is a significantly lengthy amount of time for diesel particulate matter and ozone precursors to be emitted nearby sensitive receptors, especially infants in the development stages. Emission reduction measures such as requiring Tier 4 off-road construction equipment can reduce pollutants by up to 85% and is highly recommended if emissions are above local and state thresholds adopted. Using low-VOC paints may also reduce ROC emissions once construction estimates are known. We suspect great NOx emissions due to the amount of grading and amount to be exported (another reduction measure is using 2010 and newer on-road engine vehicles for exporting material that comply with California State Regulation for In-Use On-Road Diesel Vehicles Title 13, CCR §2025). A-7-8

4) Due to the project being located near a freeway, it is recommended an HRA is conducted to assess the toxic exposure impacts the freeway will have on the residents living near the freeway. According to CARB, air pollution studies indicate that living close to high traffic and the associated emissions may lead to adverse health effects beyond those associated with regional air pollution in urban areas. Many of these epidemiological studies have focused on children. A number of studies identify an association between adverse non-cancer health effects and living or attending school near heavily traveled roadways. These studies have reported associations between residential proximity to high traffic roadways and a variety of respiratory symptoms, asthma exacerbations, and decreases in lung function in children. According to the CDC, a growing body of evidence demonstrates that minority populations and persons of lower socioeconomic status experience higher residential exposure to traffic and traffic-related air pollution than non-minorities and persons of higher socioeconomic status (CDC, Residential Proximity to Major Highways 2010). In addition to the respiratory health effects in children, proximity to freeways increases potential cancer risk and contributes to total particulate matter exposure. There are three carcinogenic toxic air contaminants that constitute the majority of the known health risk from motor vehicle traffic – diesel particulate matter (diesel PM) from trucks, and benzene and 1,3-butadiene from passenger vehicles. On a typical urban freeway (truck traffic of 10,000-20,000/day), diesel PM represents about 70 percent of the potential cancer risk from the vehicle traffic. Diesel particulate emissions are also of special concern because health studies show an association between particulate matter and premature mortality in those with existing cardiovascular disease. A-7-9

If the cancer risks exceed the state thresholds, mitigation such as locating air intakes away from the freeway, weather proofing windows, and installing vegetative barriers to buffer air pollutants travelling from the freeway to residents are recommended.

5) The project will involve demolition activities of the existing site use. Such demolition activities must be in compliance with APCD's Rule 62.7, *Asbestos- Demolition and Renovation*. The DEIR should include a section under the toxics exposure criteria for air quality to discuss potential exposure of asbestos, a toxic air contaminant, to sensitive receptors nearby. Compliance with APCD Rule 62.7 is outline before in a standard condition of approval that may be added to the project if approved. A-7-10

DEMOLITION ACTIVITIES

Purpose: To ensure that the owner or operator of a facility shall remove all asbestos-containing material from a facility being demolished.

Requirement: Project demolition activities shall be operated in accordance with the Rules and Regulations of the Ventura County Air Pollution Control District, with emphasis on Rule 62.7, *Asbestos – Demolition and Renovation*.

A-7-10 cont'd

Documentation: The project applicant shall ensure compliance with the following provision:

I. The applicant shall submit an AB3205 Form to APCD for approval. In addition, the contractor shall notify APCD 10 business days prior to the abatement commencement, if applicable, by submitting a Notification of Demolition or Renovation Form. Demolition and/or renovation activities shall be conducted in compliance with APCD Rule 62.7, Asbestos – Demolition and Renovation.

Timing: Prior to issuance of a demolition permit(s) by Building & Safety or the applicable jurisdiction agency.

Reporting and Monitoring: AB3205 form must be submitted to and approved by APCD. Building & Safety has this form in their checklist of required items to submit prior to issuance of a demolition permit. The Notification of Demolition or Renovation Form must be submitted to APCD. Enforcement of notification requirements for both forms and compliance with the APCD Asbestos Rule will be enforced by APCD Asbestos Inspectors and/or on a complaint-driven basis.

Thank you for the opportunity to comment on the project. If you have any questions, you may contact me at nicole@vcapcd.org.

Letter A-7

COMMENTER: Ventura County Air Pollution Control District (VCAPCD)

DATE: May 23, 2022

Comment A-7-1

The commenter states, Page 4.2-11. Local Regulations. Rule 74.2's general non-flat and flat coatings maximum ROC content is now 50 g/L, which went into effect on July 1, 2021. In addition to the APCD rules listed, the project demolition activities must also comply with Rule 62.7, Asbestos- Demolition and Renovation.

Response A-7-1

Comment noted. APCD's Rule 74.2 regulating general non-flat and flat coatings effectively changed ROC content requirements from 150 g/L to 50 g/L. The effective rule change went into effect on July 1, 2021. The Regulatory Section of the Draft EIR, page 4.2-11 was not updated to reflect the change in regulations. However, as noted in the methodology under PDF-AQ-3 for construction (page 4.2-14) and the first bullet under operational methodology (page 4.2-15), the analysis incorporated the 50 g/L content restriction in the analysis. The regulatory section of the Final EIR will be updated as follows to reflect the new ROC content requirements under Rule 74.2.

> **Rule 74.2 (Architectural Coatings).** This rule sets limits on the VOC content of architectural coatings. Non-flat coatings are limited to ~~1~~50 grams per liter of VOC content, flat coatings are limited to ~~1~~50 grams per liter of VOC content and traffic marking coatings are limited to ~~1~~50 grams per liter of VOC content. The project would be required to comply with this rule.

Comment A-7-2

The commenter states, Page 4.2-14. Methodology- Construction. If incorporating Tier 4 off-road construction equipment as part of the project design and to ensure the project does not create a significant air quality impact per CEQA, we recommend this feature becomes enforceable as a standard condition of approval for discretionary permit, condition under the grading permit, and/or some other means to enforce this project design feature.

Response A-7-2

1. The air quality analysis, as detailed in Section 4.2.3 *Impact Analysis* on page 4.2-14 includes two project design features that incorporate the use of Tier 4 equipment and electric/alternatively fueled equipment during construction. To ensure enforceability of these project design features, they will be incorporated as a Condition of Approval for the project as follows: All diesel-powered earthmoving equipment with greater than 100 horsepower used on-site for excavation and grading shall meet U.S. Environmental Protection Agency Tier 4 Final emissions standards.
2. During construction activities, the contractor shall, at a minimum, electrify or use alternative fuels (non-diesel) for the operation of all equipment less than 50 horsepower (welders). In addition, electricity use during the construction activities shall come from the existing electric grid instead of a diesel generator. If a generator is necessary for the completion of construction activities, a non-diesel generator shall be used.

No revisions of the Draft EIR are needed to address this comment.

Comment A-7-3

The commenter states, Page 4.2-18. Table 4.2-6. It is not clear whether the mobile operational emissions modeled took into account the proposed 10-30% on-site electric vehicle charging stations (DEIR, Page 4.5-11).

Response A-7-3

The analysis incorporated a number of reductions with respect to operational emissions as detailed in the methodology section on page 4.2-14 including daily trips from the project specific Traffic Impact Analysis, and encouraging telecommutiniting and alternative work schedules. While electric vehicle (EV) charging stations would be incorporated into the project at a rate of 10 to 30 percent, the emissions reductions from the electric vehicle charging stations were not factored into the CalEEMod emissions estimates shown in Table 4.2-6 (page 4.2-18 of the Draft EIR). Incorporation of the vehicle charging stations would have been speculative as the number and type of charging stations was not known at the time of the analysis. Therefore, as a conservative measure of emissions, potential reductions were numerically accounted for in the analysis. However, as shown in Table 4.2 6 of the Draft EIR, project operational emissions are below regulatory thresholds and incorporation of the EV charging stations would result in a further reduction in emissions from what was presented in the analysis, it would not change the significance findings. No revisions of the Draft EIR are needed to address this comment.

Comment A-7-4

The commenter states, Page 4.2-19. Toxic Air Contaminants (TAC). An additional toxic air contaminant that needs to be disclosed is potential asbestos exposure from the proposed demolition activities.

Response A-7-4

As indicated by VCAPCD, asbestos is a toxic air contaminant that the project has the potential to disturb during demolition activities. As discussed in Section 4.8, *Hazards and Hazardous Materials* (page 4.8-4) of the Draft EIR, the potential for asbestos-containing building materials (ACM) were identified in a 2017 inspection of the property. VCAPCD Rule 62.7 governs the removal and disposition of ACM. As detailed in the Hazards section, compliance with Rule 62.7 would ensure that ACM is handled appropriately and that hazardous materials are disposed of according to federal and State regulations. Therefore, impacts to workers and off-site receptors from asbestos exposure would be less than significant.

Conditions of Approval have been applied to the project, which requires the Applicant to submit an AB3205 Form to APCD for approval. In addition, the contractor shall notify APCD 10 business days prior to the abatement commencement, if applicable, by submitting a Notification of Demolition or Renovation Form. Demolition and/or renovation activities shall be conducted in compliance with APCD Rule 62.7, Asbestos – Demolition and Renovation.

While the discussion of asbestos is covered in detail in Section 4.8, *Hazards and Hazardous Materials*, of the Draft EIR, a discussion of asbestos will be added to the Section 4.2, *Air Quality* as follows:

Insertion into setting, page 4.2-4, *Air Quality* at the end of the TAC discussion:

Asbestos is another toxic air contaminant regulated by VCAPCD. Asbestos is a mineral fiber found naturally in the environment, as well as being used in a variety of building construction materials for insulation and fire retardant. The major sources of asbestos in construction materials include roofing shingles, ceiling and floor tiles, paper products, asbestos cement products, textured paint and patching compounds, and walls and ceilings around wood-burning stoves (USEPA 2022). Asbestos fibers can be released into the air during demolition, building, or maintenance/repair when asbestos-containing materials (ACM) are disturbed. Asbestos exposure has a long-term impact of developing lung diseases including lung cancer, mesothelioma, and asbestosis. (USEPA 2021a).

Insertion into Section 4.2, *Air Quality*, Regulatory Setting, page 4.2-11, after Rule 74.2:

Rule 62.7 (Asbestos – Demolition and Renovation) VCAPCD regulates demolition and renovation operations involving ACM through Rule 6.27, which applies to any planned demolition or renovation that involves 100 square feet or more of ACM, with exceptions for indoor renovations, single-unit dwelling renovations performed by the owner or occupant, and work with certain categories of ACM that are removed according to a subset of VCAPCD requirements. The requirements include a noticing period and a general prohibition on demolition until ACM has been abated and removed from the location and requires that abatement be conducted by persons with specific asbestos certifications (primarily Asbestos Hazard Emergency Response Act [AHERA] certification).

Insertion into Section 4.2, *Air Quality* the Impact Analysis, page 4.2-20 prior to the operation discussion:

Asbestos may be contained in the existing onsite building that will be demolished as part of the project's implementation. As detailed in Section 4.8.3, in the hazards impact analysis for construction (page 4.8.13), approval from the various City Departments would be dependent upon acceptance of the debris and recycling plan, which must address the disposal of hazardous wastes generated during demolition. In order to obtain a signature from VCAPCD, the applicant would have to demonstrate compliance with VCAPCD Rule 6.27, which requires abatement of ACM by a licensed contractor prior to the issuance of a demolition permit. The requirements to obtain a demolition permit for the structures on the project location would ensure that ACM is handled appropriately and that hazardous materials are disposed of according to federal and State regulations. Therefore, impacts to workers and off-site receptors from asbestos exposure would be less than significant.

Insertion into Section 4.2, *Air Quality*, Section 7, *References*, of the Draft EIR, after United States Environmental Protection Agency (USEPA). 2021. Entry on page 7-2:

_____. 2022. Learn About Asbestos. April 14, 2022. https://www.epa.gov/asbestos/learn-about-asbestos#asbestos (accessed May 2022).

Comment A-7-5

The commenter states Page 4.2-20. Toxic Air Contaminants (TAC). An toxics engineering analysis reviewed the construction-based Health Risk Assessment (HRA) and found it to be satisfactory in its assumptions and methodology. However, the DEIR states that an HRA to determine the project's toxic impacts from proximity to the U.S. 101 freeway, a potential source of TACs, was not performed due to the project being located 510 feet away from the freeway. An aerial view of the project using site plans in the DEIR indicates an approximate distance of 450 feet from the northeastern most boundary directly straight towards the 101 freeway (see aerial photo below).

The commenter states, The California Air Resources Board (CARB) recommends avoiding siting sensitive land uses within 500 feet of a freeway, urban roads with 100,000 vehicles/day due to the respiratory health effects of diesel particulate matter (DPM). "In addition to the respiratory health effects in children, proximity to freeways increases potential cancer risk and contributes to total particulate matter exposure. There are three carcinogenic toxic air contaminants that constitute the majority of the known health risk from motor vehicle traffic – diesel particulate matter (diesel PM) from trucks, and benzene and 1,3-butadiene from passenger vehicles. On a typical urban freeway (truck traffic of 10,000-20,000/day), diesel PM represents about 70 percent of the potential cancer risk from the vehicle traffic. Diesel particulate emissions are also of special concern because health studies show an association between particulate matter and premature mortality in those with existing cardiovascular disease." (CARB 2005 Air Quality and Land Use Handbook Page 8). The Handbook also recommends avoiding siting new sensitive land uses within 300 feet of a large gas station (defined as a facility with a throughput of 3.6 million gallons per year or greater) and recommends a 50-foot separation from all gas stations (CARB 2005 Air Quality and Land Use Handbook, Tables 1-1, 1-2). The project is adjacent to gasoline dispensing stations on both the north and south side.

While we note that the CARB guidance is advisory and lead agencies must factor other considerations, including housing and transportation needs, APCD would recommend at a minimum an HRA be performed for disclosure purposes of any potential toxic impacts the U.S. 101 freeway will have on the proposed project.

If toxic impacts are found to be over the thresholds established by the California Office of environmental Health Hazard Assessment (OEHHA), we recommend the following mitigation measures:

- Locating the air intakes farthest away from source of toxic contaminants (southern boundaries)
- Weatherproofing all windows (residential and commercial)
- Limiting window opening capability for units along northern boundary

The project already includes the following project design features, which are additional mitigation measures APCD would recommend to mitigate toxic impacts from roadways:

- Installation of heating ventilation and air condition (HVAC) system
- Installation of MERV 13 standard air filtration for residential units
- Installation of vegetative barrier along perimeter of project

APCD submitted comments for the Notice of Preparation on January 31, 2022 for the project (DEIR Appendix A, PDF Page 280) which included a recommendation to perform an HRA due to proximity of the U.S. 101 freeway (Comment #4). A copy is enclosed for reference.

Response A-7-5

In response to VCAPCD's comment a discussion of the health risk from the project's proximity to the two site adjacent gas stations as well as the U.S. 101 Freeway have been included in the EIR. Based on the results of the HRA, Conditions of Approval have been applied to the project, which requires the Applicant to include MERV filtration systems rated between MERV 13 and MERV 16 depending on residential unit's location as described in detail in the HRA. In addition, the Applicant would be required to weatherproof all windows for both residential and commercial portions of the development and limit the window opening capability of the residential units along the northern boundary. Implementation of the conditions of approval will ensure that risk is within acceptable levels for the onsite residents.

As the HRA shows, with implementation of 2019 Title 24 as detailed in the project Conditions of Approval, carcinogenic and non-carcinogenic risk levels would be consistent with VCAPCD thresholds. Additionally, criteria pollutant concentrations would be below the California Ambient Air Quality Standards (CAAQS). As such, risk levels were determined to be within acceptable limits for onsite residences.

Revisions of the Draft EIR to discuss Site Proximity to TAC sources will be added to Section 4.2 Air Quality, page 4.2-20 of the Draft EIR as follows:

~~CARB further suggests that an operational health risk assessment be conducted for new developments resulting in sensitive receptors being placed within 500 feet of an existing high-volume roadway. A high-volume roadway is defined as an urban roadway with more than 100,000 vehicles per day. The closest freeway is the U.S. 101 approximately 510 feet north of the proposed project site, therefore the proposed project would not place new sensitive receptors within 500 feet of a high-volume roadway. In addition, the Title 24 standards would require new residential units to include MERV 13 standard air filtration (at a minimum) that would reduce PM_{10} emissions by at least 70 percent. Therefore, new residents are not anticipated to be adversely affected by exposure to vehicle exhaust long term.~~

Risk to Onsite Residents from Proximity to TAC Sources

The impacts of the environment on the project, specifically impact from proximity to freeways, is not one of the criteria identified in CEQA Guidelines Appendix G for determining whether a development would result in significant air quality impacts. Additionally, the purpose of environmental evaluation under CEQA is to identify the significant effects of the project on the environment, not the significant effects of the environment on the project as confirmed by *California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369 (Case No. S213478). Therefore, the discussion in this section is provided for informational and disclosure purposes only and is not considered part of the impact analysis for the purpose of CEQA compliance.

Gas Stations

The California Air Resources Board (CARB) recommends avoiding siting new sensitive land uses within 300 feet of a large gas station (defined as a facility with a throughput of 3.6 million gallons per year or greater) and recommends a 50-foot separation from all gas stations (*CARB 2005*). The project is adjacent to gasoline dispensing stations on both the north and south side. The fueling stations and tank vents for the station to the north of the project is

approximately 90 feet north of Building A. The fueling stations and tank vents for the station to the south are approximately 70 feet south of Building B and 54 feet east of the small open space area on the southern end of the project property. This is greater than the 50-foot separation from all gas stations. According to the California Energy Commission total throughput of gasoline in the City of Thousand Oaks in 2020 was 20,924,081 gallons (CEC 2022). According to the VCAPCD's Facility Information System there are 26 facilities with permits for gasoline dispensing, of those 13 are identifiable as commercial gasoline dispensing stations such as those by the site (VCAPCD 2006). Averaging the throughput over these thirteen stations only would result in a throughput of approximately 1.6 million gallons per year, well below the 3.6 million gallons required to qualify as a large gas station by CARB. According to CARB 96 percent of gasoline dispensing facilities have a throughput of less than 2.4 million gallons per year (CARB 2005a).

Therefore, given the amount of gasoline sold in Thousand Oaks, the number of gasoline dispensing facilities, and the fact that 96 percent of gasoline stations have an annual throughput of 2.4 million gallons, the service stations near the project are anticipated to be under the 3.6 million gallons per year throughput that warrants a 300 foot buffer distance. As stated, the project's receptor locations would be greater than 50 feet from the fuel islands and tank vents and therefore would not require a health risk assessment for the proximity to these gas stations. Additionally, as discussed in the Draft EIR the residential units within the project would be required to install MERV filtration units of a minimum rate of MERV 13. This would further reduce potential risk to future residents at the project site.

101 Freeway

The project site is located approximately 450 feet south of the U.S.101 Freeway therefore, a refined health risk assessment (HRA) was performed by Air Quality Dynamics to determine the potential risk to onsite residents from the projects proximity to the freeway (Air Quality Dynamics 2022).

The assessment and modeling methodologies used in preparation of the freeway health risk assessment followed the procedures outlined by USEPA, the California Environmental Protection Agency, and VCAPCD. The HRA is included as Attachment A to the Response to Comments. In compliance with 2019 Title 24 requirements, the proposed project would include MERV filtration systems with a minimum rating of MERV 13. With the implementation of MERV 13 filtration systems throughout the site, the cancer risk for the project site from proximity to the U.S. 101 would range from 0.97 in 100,000 in Building B to 1.7 in 100,000 in Building A closest to the freeway (northeast corner of the building). With implementation of air filtration systems with a rating of MERV 14 to MERV 16 for units where implementation of MERV 13 filtration systems results in a cancer risk greater than 1 in a 100,000, risk at these units are reduced to a maximum of 1 in 100,000 equal to the VCAPCD's 1 in 100,000 threshold (Air Quality Dynamics 2022). Additionally, as indicated in Attachment A, non-cancer risk levels range from 0.01 to 0.02 with the incorporation of MERV 13 filtration and is below the VCAPCD's non-cancer acute and chronic thresholds of 1.

Based on results of the HRA, MERV filtration systems rated between MERV 13 and MERV 16 will be installed depending on residential unit's location. Detailed figures that show the MERV ratings applied to units by location are included as Appendix A to the HRA (Air Quality Dynamics 2022). In addition, all windows will be weatherproofed for both residential and commercial portions of the development and limited window opening capability will be

applied to the residential units along the northern boundary. Implementation of these measures will ensure that risk is within acceptable levels for the onsite residents.

Revisions of the Draft EIR to discuss Site Proximity to TAC sources will be added to Section 7, *References,* page 7-2 under Air Quality as follows:

Air Quality

Air Quality Dynamics. 2022. *T.O. Ranch – Hampshire Road Freeway Health Risk Assessment.* May 2022. Included as Attachment A to the Final EIR.

California Air Resource Board (CARB). 2005a. *Air Quality and Land Use Handbook;* page 31. https://ww3.arb.ca.gov/ch/handbook.pdf.

_____.*2005b. Air Quality and Land Use Handbook*, Tables 1-1, 1-2.

~~California Air Resource Board (CARB)~~ _____. 2022. Top 4 Summary: Select Pollutant, Years & Area. https://www.arb.ca.gov/adam/topfour/topfour1.php (accessed February 2022).

California Department of Finance (DOF). 2021. E-1 Population Estimates for Cities, Counties, and the State — January 1, 2020 and 2021. https://dof.ca.gov/Forecasting/Demographics/Estimates/e-1/ (accessed February 2022).

California Energy Commission. 2022. A15 Survey Responses – Gasoline Sales (Million Gallons) By Municipality. https://www.energy.ca.gov/data-reports/energy-almanac/transportation-energy/california-retail-fuel-outlet-annual-reporting (accessed June 2022).

…

Ventura County Air Pollution Control District (VCAPCD). 2003. Ventura County Air Quality Assessment Guidelines. October 2003. http://www.vcapcd.org/pubs/Planning/VCAQGuidelines.pdf (accessed February 2022).

_____. 2006. Facility Info System. http://www.vcapcd.org/FIS.htm (Accessed June 2022).

Comment A-7-6

The commenter states, Air Quality Section- The air quality assessment should consider project consistency with the 2016 Air Quality Management Plan (AQMP). The 2016 AQMP presents Ventura County's strategy (including related mandated elements) to attain the 2008 federal 8-hour ozone standard by 2020, as required by the federal Clean Air Act Amendments of 1990 and applicable U.S. EPA clean air regulations. The 2016 AQMP uses an updated 2012 emissions inventory as baseline for forecasting data, SCAG RTP 2016 data, and CARB's EMFAC2014 emission factors for mobile sources. The AQMP can be downloaded from our website at http://www.vcapcd.org/AQMP2016.htm.

Response A-7-6

The air quality analysis details compliance with the 2016 Air Quality Management Plan (AQMP) under impact AQ-1 starting on page 4.2-16, of the Draft EIR. The analysis concludes that the project would be compliant with the 2016 AQMP as it would not generate growth exceeding the AQMP population forecasts and therefore impacts would be less than significant. Thus, no revisions to the Draft EIR are required to address this comment.

Comment A-7-7

The commenter states, the Ventura County Air Quality Assessment Guidelines (AQAG) is recommended to evaluate all potential air quality impacts. The AQAG are also downloadable from our website here: http://www.vcapcd.org/environmental-review.htm. Specifically, the air quality assessment should consider reactive organic compound, nitrogen oxide emissions and particulate matter from all project-related motor vehicles, sources not permitted with APCD, and construction equipment that may result from potential buildout, as appropriate to future development policies and implementation measures. We note that the AQAG has not been updated since 2003 and serves as a reference and is not required or mandated by the APCD (AQAG, Page 1-1). Current air quality determinations follow the same methodology but using different tools (CalEEMod vs. URBEMIS, updated OEHHA standards for toxics). The recommended list of mitigation measures in the AQAG are also limited and outdated. More innovative solutions exist rather than contributing to a TDM Fund Mitigation, such as installing bicycle lockers, EV charging stations, energy standards exceeding Title 24, etc. For example, the following template is currently being recommended by APCD as a Commenting Agency for projects that include construction equipment, reflecting state laws adopted since the AQAG was last updated in 2003:

Construction Equipment

Purpose: In order to ensure that ozone precursor and particulate emissions from diesel-powered mobile construction equipment are reduced to the greatest amount feasible.

Requirement: The Permittee shall comply with the provisions of all applicable California State Laws and APCD Rules and Regulations regarding portable construction equipment and construction vehicles.

Documentation: The project applicant shall ensure compliance with the following State Laws and APCD requirements:

I. Construction equipment shall not have visible emissions greater than 20% opacity, as required by APCD Rule 50, Opacity.

II. All portable diesel-powered equipment over 50 BHP shall be registered with the State's Portable Equipment Registration Program (PERP) or an APCD Portable Permit.

III. Off-Road Heavy-Duty trucks shall comply with the California State Regulation for InUse Off-Road Diesel Vehicles (Title 13, CCR §2449), the purpose of which is to reduce NOx and diesel particulate matter exhaust emissions.

IV. On-Road Heavy-Duty trucks shall comply with the California State Regulation for InUse On-Road Diesel Vehicles (Title 13, CCR §2025), the purpose of which is to reduce NOx and diesel particulate matter exhaust emissions.

V. All commercial on-road and off-road diesel vehicles are subject to the idling limits of Title 13, CCR §2485, §2449(d)(3), respectively. Construction equipment shall not idle for more than five (5) consecutive minutes. The idling limit does not apply to: (1) idling when queuing; (2) idling to verify that the vehicle is in safe operating condition; (3) idling for testing, servicing, repairing or diagnostic purposes; (4) idling necessary to accomplish work for which the vehicle was designed (such as operating a crane); (5) idling required to bring the machine system to operating temperature, and (6) idling necessary to ensure safe operation of the vehicle. It is the Permittee's responsibility to have a written idling policy that is made available to operators of the vehicles and equipment and informs them that idling is limited to 5 consecutive minutes or less, except as exempted in subsection a. above.

The following are recommended emission reduction measures for construction equipment and vehicles:

I. Diesel powered equipment should be replaced by electric equipment whenever feasible.

II. Maintain equipment engines in good condition and in proper tune as per manufacturer's specifications.

III. Lengthen the construction period during smog season (May through October), to minimize the number of vehicles and equipment operating at the same time.

IV. Use alternatively fueled construction equipment, such as compressed natural gas (CNG), liquefied natural gas (LNG), or electric, if feasible.

V. Use of Tier 3 and Tier 4 off-road construction equipment shall be used, if feasible.

Response A-7-7

The air quality analysis was conducted using the Ventura County Air Quality Assessment Guidelines (AQAG) as discussed in Section 4.2, *Air Quality*, of the Draft EIR. The guidance, while not specifically named in the methodology or thresholds sections, was used to inform the estimation of emissions and the determination of appropriate significance thresholds. Measures from the AQAG such as implementation of dust suppression and incorporation of Tier 4 and alternatively fueled construction equipment were implemented as project design features, or as regulatory requirements to reduce pollutant emissions during construction activities. No revisions to the Draft EIR are required to address this comment.

Comment A-7-8

The commenter states, "it is important to quantify construction emissions, although they are temporary and short-term in nature and not included in the impact determination for attaining the ambient air quality standards for ozone. Construction is proposed to occur for 21-29 months, which is a significantly lengthy amount of time for diesel particulate matter and ozone precursors to be emitted nearby sensitive receptors, especially infants in the development stages. Emission reduction measures such as requiring Tier 4 off-road construction equipment can reduce pollutants by up to 85% and is highly recommended if emissions are above local and state thresholds adopted. Using lowVOC paints may also reduce ROC emissions once construction estimates are known. We suspect great NOx emissions due to the amount of grading and amount to be exported (another reduction measure is using 2010 and newer on-road engine vehicles for exporting material that comply with California State Regulation for In-Use On-Road Diesel Vehicles Title 13, CCR §2025).

Response A-7-8

The air quality analysis estimated construction emissions for implementation of the project. Modeling results are summarized in Section 4.2 on page 4.2-17 under Impact AQ-2. Modeling results are included in Appendix B, *Air Quality and Greenhouse Gas Emissions and Energy Report T.O. Ranch Project*. As shown in Table 4.2-5 of the Draft EIR, with incorporation of project design features, construction emissions would result in less than significant impacts and no mitigation would be required. No revisions of the Draft EIR are required to address this comment.

Comment A-7-9

The commenter states, due to the project being located near a freeway, it is recommended an HRA is conducted to assess the toxic exposure impacts the freeway will have on the residents living near the freeway. According to CARB, air pollution studies indicate that living close to high traffic and the associated emissions may lead to adverse health effects beyond those associated with regional air pollution in urban areas. Many of these epidemiological studies have focused on children. A number of studies identify an association between adverse non-cancer health effects and living or attending school near heavily traveled roadways. These studies have reported associations between residential proximity to high traffic roadways and a variety of respiratory symptoms, asthma exacerbations, and decreases in lung function in children. According to the CDC, a growing body of evidence demonstrates that minority populations and persons of lower socioeconomic status experience higher residential exposure to traffic and traffic-related air pollution than non-minorities and persons of higher socioeconomic status (CDC, Residential Proximity to Major Highways 2010). In addition to the respiratory health effects in children, proximity to freeways increases potential cancer risk and contributes to total particulate matter exposure. There are three carcinogenic toxic air contaminants that constitute the majority of the known health risk from motor vehicle traffic – diesel particulate matter (diesel PM) from trucks, and benzene and 1,3-butadiene from passenger vehicles. On a typical urban freeway (truck traffic of 10,000-20,000/day), diesel PM represents about 70 percent of the potential cancer risk from the vehicle traffic. Diesel particulate emissions are also of special concern because health studies show an association between particulate matter and premature mortality in those with existing cardiovascular disease.

If the cancer risks exceed the state thresholds, mitigation such as locating air intakes away from the freeway, weather proofing windows, and installing vegetative barriers to buffer air pollutants travelling from the freeway to residents are recommended.

Response A-7-9

The VCAPCD recommended a health risk assessment for proximity to the freeway be included in the analysis. As detailed under Response to Comment A-7-5 above, a health risk due to proximity of the project to U.S. 101 was performed for informational purposes. As presented in Response to Comment A-7-5, with the incorporation of MERV filtration ranging from 2013 to 2016 as required under 2019 Title 24 and implemented for the project under the project Conditions of Approval, risk to residents living within the proposed project would be equal to or below the 1 in 100,000 VCAPCD threshold for cancer risk and below the non-cancer threshold of 1. No revisions to the Draft EIR are required to address this comment.

Comment A-7-10

The commenter states, the project will involve demolition activities of the existing site use. Such demolition activities must be in compliance with APCD's Rule 62.7, Asbestos- Demolition and Renovation. The DEIR should include a section under the toxics exposure criteria for air quality to discuss potential exposure of asbestos, a toxic air contaminant, to sensitive receptors nearby. Compliance with APCD Rule 62.7 is outline before in a standard condition of approval that may be added to the project if approved.

Response A-7-10

As indicated by VCAPCD, asbestos is a toxic air contaminant that the project has the potential to disturb during demolition activities. The inclusion of a discussion of asbestos in Section 4.2, *Air Quality* is detailed in Response to Coment A-7.4. No revisions of the Draft EIR are required to address this comment.

Letter IP-1

[redacted]

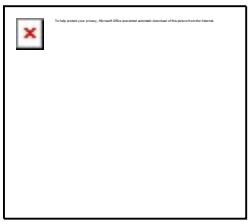
From: Eric De Wames <edewames@sullivanattorneys.com>
Sent: Tuesday, March 22, 2022 10:10 AM
To: contreras@toaks.org
Cc: Carlos Contreras
Subject: Re: Kmart Hampshire Project

Get answers to your COVID-19 California employment law and workers' compensation questions using our free, comprehensive guide that is always up to date: Navigating COVID-19: A Legal Guide for California Employers.

Eric De Wames - Managing Partner - Employment Law Department
Michael Sullivan & Associates LLP
PO Box 85059
San Diego, CA 92186-5059
p: 818.338.4000 | f: 844.910.1850
e: edewames@sullivanattorneys.com

_____

Website | LinkedIn | Twitter | Instagram | Facebook | Sullivan on Comp



> On Mar 22, 2022, at 9:51 AM, Eric De Wames <edewames@sullivanattorneys.com> wrote:
>
> ï»¿Good morning, Mr. Contreras:
>
> I am a nearby resident of this project and would like to speak to our council at the next hearing. Can you please let me know the date/time and any procedures I need to follow to have the opportunity. Further, I would like to review the hearing from May 2020 on the issue. I have attempted to locate on your YouTube platform, but Iâ€™ve been unable to locate. Can you direct me to the link as well please? IP-1-1 IP-1-2
>
> Best,
>
> Eric De Wames
> Cell:916-802-6483

Letter IP-1

COMMENTER: Eric De Wames

DATE: March 22, 2022

Comment IP-1-1

The commenter states they are a nearby resident of this project and would like to speak to our council at the next hearing. Commenter asks for the date/time and any procedures to follow to have the opportunity. Further, I would like to review the hearing from May 2020 on the issue. Commenter states there have attempted to locate on your YouTube platform but been unable to locate and requests to be directed to the link.

Response IP-1-1

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. City of Thousand Oaks decision makers will consider all comments on the proposed project. No further response is necessary.

Thank you for your patience on the response. Please feel free to contact me should you have any further questions or concerns.

Kind Regards,

Letter IP 2

Carlos Contreras || **Senior Planner** || Development Planning Supervisor
Community Development Department
Planning Division
2100 Thousand Oaks Boulevard
Thousand Oaks, CA 91362
Email: **ccontreras@toaks.org**
Office: (805) 449-2317
City of Thousand Oaks

***Please Note:**
Effective **Monday May 10, 2021** City Hall Public Counter services will be available to walk-in traffic for those services that cannot be conducted remotely. Public Counters will be open **Monday - Thursday from 7:30am-5pm and alternate Friday's 8am to 5pm**. Public Counter services are also available remotely via phone, email, or videoconference. Additionally, City of Thousand Oaks Planning Division only accepts digital submittals via the online **Virtual Counter**. Please visit www.toaks.org/cdd for more information.

On Thu, May 5, 2022 at 4:56 PM A Huffine <2asocal@gmail.com> wrote:

> Most likely, what is the "interested parties list" and what does it provide? | IP-2-1
>
> What are the steps before this proposed development can gain approval or be denied? | IP-2-2
>
> Wondering where you stand on this? | IP-2-3
>
> Does the Planning Division have a Pro's and Con's for this proposed development? | IP-2-4
>
> How many apartments are being proposed and what will the estimated number of tenants? | IP-2-5
>
> I see there was an Environmental Study done; however I haven't seen a traffic or infrastructure study to determine the changes that will be needed for that area and what are those costs and implications? | IP-2-6
>
> On Thu, May 5, 2022 at 3:33 PM Carlos Contreras <CContreras@toaks.org> wrote:
>
> > Hello,
> >
> > Yes, please direct questions, concerns, and comments to me. Would like to be added to the interested parties list?

Carlos Contreras || **Senior Planner** || Development Planning Supervisor

Community Development Department

Planning Division

2100 Thousand Oaks Boulevard

Thousand Oaks, CA 91362

Email: **ccontreras@toaks.org**

Office: (805) 449-2317

City of Thousand Oaks

***Please Note:**

Effective **Monday May 10, 2021** City Hall Public Counter services will be available to walk-in traffic for those services that cannot be conducted remotely. Public Counters will be open **Monday - Thursday from 7:30am-5pm and alternate Friday's 8am to 5pm**. Public Counter services are also available remotely via phone, email, or videoconference. Additionally, City of Thousand Oaks Planning Division only accepts digital submittals via the online **Virtual Counter**. Please visit www.toaks.org/cdd for more information.

From: A Huffine <2asocal@gmail.com>
Sent: Thursday, May 5, 2022 2:05 PM
To: Carlos Contreras <CContreras@toaks.org>
Subject: TO Ranch Proposal - Development

Carlos if we have questions and concerns about this proposed project development are we to direct these to you?

Lead Agency:

City of Thousand Oaks 2100 Thousand Oaks Boulevard, Thousand Oaks, CA 91362

Tel. 805-449-2100

Contact: Carlos Contreras, Senior Planner

--

Thanks,

Alan Huffine

--
Thanks,
Alan

--
Thanks,
Alan

Letter IP-2

COMMENTER: Alan Huffine

DATE: May 5, 2022

Comment IP-2-1

The commenter asks, what is the "interested parties list" and what does it provide?

Response IP-2-1

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. However, the City keeps a list of organizations, and individuals (interested parties) that want to be informed about projects proposed in the city.

Comment IP-2-2

The commenter asks what are the steps before this proposed development can gain approval or be denied.

Response IP-2-2

The environmental review process was discussed in Section 1, *Introduction,* of the Draft EIR. This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR.

Comment IP-2-3

The commenter asks where the City stands on this project.

Response IP-2-3

As stated in Section 1.3, *Lead, Responsible, and Trustee Agencies*, of the Draft EIR, the City of Thousand Oaks (City Council) has principal authority for approving or denying the project. This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. City of Thousand Oaks decision makers will consider all comments on the proposed project. No further response is necessary.

Comment IP-2-4

The commenter asks if the Planning Division have a pro's and con's for this proposed development.

Response IP-2-4

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. City of Thousand Oaks decision makers will consider all comments on the proposed project. No further response is necessary.

Comment IP-2-5

The commenter asks how many apartments are being proposed and what will the estimated number of tenants.

Response IP-2-5

The proposed project includes the construction of 420 dwelling units, and 15,000 sf of restaurant and retail uses and has been described in detail in Section 2, *Project Description*, of the Draft EIR. City of Thousand Oaks decision makers will consider all comments on the proposed project. No further response is necessary.

Comment IP-2-6

The commenter states there was an Environmental Study, however the commenter has not seen a traffic or infrastructure study to determine the changes that will be needed for that area and what are those costs and implications.

Response IP-2-6

The Draft EIR was distributed for public review from April 8, 2022 to May 23, 2022; copies of the Draft EIR including the technical studies related to traffic and infrastructure are available on the City's website at: Environmental Impact | Thousand Oaks, CA (toaks.org). Also, the Draft EIR document is also available at the public counter, should any member of the public want to review the physical copy.

Letter IP-3

***Please Note:**
Effective **Monday May 10, 2021** City Hall Public Counter services will be available to walk-in traffic for those services that cannot be conducted remotely. Public Counters will be open **Monday - Thursday from 7:30am-5pm and alternate Friday's 8am to 5pm**. Public Counter services are also available remotely via phone, email, or videoconference. Additionally, City of Thousand Oaks Planning Division only accepts digital submittals via the online **Virtual Counter**. Please visit www.toaks.org/cdd for more information.

From: rosangela littledreamers.com <rosangela@littledreamers.com>
Sent: Tuesday, May 10, 2022 9:21 AM
To: Lori Goor <LGoor@toaks.org>
Subject: Re: City of Thousand Oaks Planning Commission Public Hearing Notice for May 23, 2022 for 21-70214

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Lori,

Thank you so much for the mail and the information regarding the Project Development. I was wondering two things:

1. I am out of the country at that time- how would I be able to attend this hearing/meeting. Is there a Zoom option? IP-3-1
2. I wanted to find out if there was a possibility of obtaining copies of the environmental report before the hearing/meeting to see how our facility will be impacted by the noise/constructions/environmental issues/traffic/road closures/delays etc.? IP-3-2

I have been trying to get information in regards to this project and I am not having any support. I did peak to Carlos once, I gave him my email, he emailed the morning of to inform me that I could get on a planning zoom meeting that morning. As I am sure you can understand, with no time to get coverage for me at the school, I was not able to attend. I did follow up with an email and I have not heard back from him. Any assistance is much appreciated. IP-3-3

Sincerely,
Rosangela Valerio-Dyszkant
Little Dreamers E.C.C.
Owner

From: Lori Goor <LGoor@toaks.org>
Sent: Monday, May 9, 2022 4:45 PM
To: Lori Goor <lorigoor@verizon.net>
Subject: City of Thousand Oaks Planning Commission Public Hearing Notice for May 23, 2022 for 21-70214

Hi,

You had expressed interest the subject item, and the Public Hearing Notice is attached.

Thank You,

Lori Goor
Senior Recording Secretary
Community Development Department
City of Thousand Oaks
(805) 449-2312

For information on services available at City Hall, visit www.toaks.org/cdd

Letter IP3

COMMENTER: Rosangela Valerio-Dyszkant

DATE: May 10, 2022

Comment IP-3-1

The commenter asks how she would be able to attend this hearing/meeting and is there a Zoom option.

Response IP-3-1

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. City of Thousand Oaks decision makers will consider all comments on the proposed project. No further response is necessary.

Comment IP-3-2

The commenter states asks if there was a possibility of obtaining copies of the environmental report before the hearing/meeting to see how our facility will be impacted by the noise/constructions/ environmental issues/traffic/road closures/delays etc.

Response IP-3-2

The Draft EIR is available on the City of Thousand Oaks' website at: Environmental Impact | Thousand Oaks, CA (toaks.org). Additionally, the Draft EIR document is also available at the public counter, should any member of the public want to review the physical copy. City of Thousand Oaks decision makers will consider all comments on the proposed project. No further response is necessary.

Comment IP-3-3

The commenter states they are having trouble getting information regarding this project.

Response IP-3-3

City of Thousand Oaks decision makers will consider all comments on the proposed project. No further response is necessary. Nevertheless, the commenter was added to the interested parties list for the project and on April 8, 2022, the City sent an email regarding the Notice of Availability, which included a link where the Draft EIR is available: Environmental Impact | Thousand Oaks, CA (toaks.org). Also, the Draft EIR document is also available at the public counter, should any member of the public want to review the physical copy.

Letter IP - 4

LAW OFFICES
WILLIAM D. KOEHLER
A PROFESSIONAL CORPORATION
12522 MOORPARK STREET
SUITE 103
STUDIO CITY, CALIFORNIA 91604-1390
E-MAIL: wdklaw1@aol.com

WILLIAM D. KOEHLER, ESQ.

TELEPHONE
(818) 506-8322

FACSIMILE
(818) 769-9438

May 23, 2012

Via Email Only: communitydevelopment@toaks.org

Thousand Oaks Planning Commission
2100 Thousand Oaks Boulevard
Thousand Oaks, CA 91362

Re: **May 23, 2022 Planning Commission Meeting**
Subject: Agenda Item 8
Applicant: IMT Capital V Hampshire V LLC

To The Honorable Planning Commission:

Thank you for allowing me to share my comments with you with respect to Agenda Item 8 on this evening's Planning Commission Agenda.

As a long time resident of the Conejo Valley, I have seen the property that is the subject of this development sit vacant. Not only has this non-productive piece of land not generated additional income to the City via sales tax, gas tax, etc., but has been a noticeable scar upon the landscape of the City for far too long. IP-4-1

I have carefully reviewed the application of IMT Capital V Hampshire LLC to develop a mixed use and multi family residential development on the former K-Mart site. While I believe that this is an appropriate project for this site, and would support this Agenda Item, I can anticipate that the most vocal opposition would be that of increased traffic, as that seems to be the go to opposition for most new developments in the Conejo Valley for a number of years. IP-4-2

While very sensitive to the potential concerns regarding increased traffic, after carefully looking at this project, I find it to be the type of development the community has been looking for that would minimize offsite traffic, rather than increase traffic on our City streets. In support of this position is the fact that this project would be developed as a "work-use" development, which would allow residents to work on site rather than to drive to a destination employer. The site would also include amenities such as a dog park which, contrary to the dog parks in other local communities, the park is onsite, thereby dog owners would not have to drive to an offsite destination to exercise their dog. IP-4-3

As we are all well aware of the State's ongoing mandate for cities to create more housing, this development would provide 420 units, including 50 affordable units, thereby creating more opportunities for individuals working in the Conejo Valley to be able to live in close proximity to their employment, and enjoy the wonderful amenities that exist from living in the Conejo Valley. IP-4-4

I urge the Planning Commission to support this Agenda Item 8, and adopt the recommendation contained in the staff report. IP-4-5

I thank you for your consideration of this request.

Very truly yours,

WILLIAM D. KOEHLER
Board Member Greater Conejo Valley Chamber of Commerce,
and Former Planning Commissioner, City Councilman, and
Mayor - City of Agoura Hills

WDK/st

Letter IP4

COMMENTER: William D. Koehler

DATE: May 23, 2022

Comment IP-4-1

The commenter provides statement concerning the vacant site.

Response IP-4-1

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. City of Thousand Oaks decision makers will consider all comments on the proposed project. No further response is necessary.

Comment IP-4-2

The commenter provides statement that the most vocal opposition would be for increased traffic.

Response IP-4-2

As stated in Section 4.14, *Transportation and Traffic*, of the Draft EIR there would not be traffic impacts associated with development of the proposed project and mitigation measures would not be required.

Comment IP-4-3

The commenter provides statement regarding the positive benefits of the site, by providing jobs and a dog park on-site thereby reducing traffic.

Response IP-4-3

Comment noted. Because traffic congestion is no longer a CEQA impact under SB 743, this comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. City of Thousand Oaks decision makers will consider all comments on the proposed project. No further response is necessary.

Comment IP-4-4

The commenter provides statement regarding the positive benefits of the site by adding more housing for the area.

Response IP-4-4

Comment noted. This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. City of Thousand Oaks decision makers will consider all comments on the proposed project. No further response is necessary.

Comment IP-4-5

The commenter urges the Planning Commission to support the project.

Response IP-4-5

Comment noted. This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. City of Thousand Oaks decision makers will consider all comments on the proposed project. No further response is necessary.

Letter O-1

[redacted]

From: Maria Sarmiento <maria@mitchtsailaw.com>
Sent: Friday, May 13, 2022 10:25 AM
To: Carlos Contreras; City Clerk's Office
Cc: Mitchell Tsai; Jason Cohen; Hind Baki; Rebekah Youngblood; Brandon Young; Steven Thong; Malou Reyes
Subject: SWRCC - [City of Thousand Oaks, T.O. Ranch Project, 325 & 391 Hampshire Road] - PRA Request and Notice List Request
Attachments: 20220513_T.O.Ranch_FollowUpPRArequest.pdf

Good Morning,

Attached please find our follow-up public records act request regarding the above mentioned project in the City of Thousand Oaks. This PRA Request also includes a request to be placed on the Advanced Notice and Interested Parties List for this project. O-1-1

Please confirm receipt of this email and its attachment.

Thank you.

Maria Sarmiento
Paralegal
Mitchell M. Tsai, Attorney At Law
139 South Hudson Avenue Suite 200
Pasadena, CA 91101
Phone: (626) 314-3821
Fax: (626) 389-5414
Email: maria@mitchtsailaw.com
Website: http://www.mitchtsailaw.com

*** Our Office Has Recently Moved. Please Note New Mailing Address ****

Ph: (626) 381-9248
Fx: (626) 389-5414
Em: info@mitchtsailaw.com

Mitchell M. Tsai
Attorney At Law

139 South Hudson Avenue
Suite 200
Pasadena, California 91101

VIA E-MAIL

May 13, 2022

Carlos Contreras
Senior Planner
City of Thousand Oaks
2100 Thousand Oaks Boulevard
Thousand Oaks, CA 91362
Em: ccontreras@toaks.org

Cynthia Rodriguez
City Clerk
City of Thousand Oaks
2100 Thousand Oaks Boulevard
Thousand Oaks, CA 91362
Em: cityclerk@toaks.org

RE: Public Records Act and Mailing List Request Regarding T.O Ranch Mixed-Use and Multi-Family Residential Development 325 & 391 Hampshire Road (SCH#: 2021120559).

Dear Carlos Contreras and Cynthia Rodriguez,

On behalf of Southwest Regional Council of Carpenters ("**SWRCC**" or "**Southwest Carpenters"**) and its members, this Office requests that the City of Thousand Oaks ("**City**") provide any and all information referring or related to the T.O Ranch Mixed-Use and Multi-Family Residential Development 325 & 391 Hampshire Road ("**Project**") pursuant to the California Public Records Act ("**PRA**"), Cal. Government ("**Gov't**") Code §§ 6250–6270 (collectively "**PRA Request**").

Moreover, SWRCC requests that City provide notice for any and all notices referring or related to the Project issued under the California Environmental Quality Act ("**CEQA**"), Cal Public Resources Code ("**PRC**") § 21000 *et seq*, and the California Planning and Zoning Law ("**Planning and Zoning Law**"), Cal. Gov't Code §§ 65000–65010. California Public Resources Code Sections 21092.2, and 21167(f) and

O-1-1 cont'd

Government Code Section 65092 require agencies to mail such notices to any person who has filed a written request for them with the clerk of the agency's governing body.

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

I. PUBLIC RECORDS ACT REQUEST.

Southwest Carpenters is requesting any and all information referring or related to the Project dating after October 9th, 2020.

The Public Records Act defines the term "public record" broadly as "any writing containing information relating to the conduct of the public's business . . . regardless of physical form and characteristics." Gov't Code § 6252(d). "Records" includes all communications relating to public business regardless of physical form or characteristics, including but not limited to any writing, picture, sound, or symbol, whether paper, magnetic, electronic, text, other media, or written verification of any oral communication. Included in this request are any references in any appointment calendars and applications, phone records, or text records. These "records" are to include, but are not limited to correspondences, e-mails, reports, letters, memorandums, and communications by any employee or elected official of City concerning the Project.

O-1-1 cont'd

Please include in your response to this request the following examples of "records," as well as any similar physical or electronic forms of communication: any form of writing such as correspondence, electronic mail records ("email"), legal and factual memoranda, facsimiles, photographs, maps, videotapes, film, data, reports, notes, audiotapes, or drawings. Cal. Government Code § 6252(g) (defining a writing to including "any record thereby created, regardless of the manner in which the record has been stored"). Responsive correspondence should include, inter alia, emails, text messages, or any other form of communication regardless of whether they were sent or received on public or privately-owned electronic devices "relating to the conduct of the public's business." Cal. Government Code § 6252(e); *Citizens for Ceres v. Super. Ct.* ("*Ceres*") (2013) 217 Cal. App. 4th 889, 909; *Citizens for Open Gov't v. City of Lodi ("Lodi")* (2012) 205 Cal.App.4th 296, 307, 311; *City of San Jose v. Superior Court* (2017) 2

Cal. 5th 608, 625 (finding that a public employee or officer's "writings about public business are not excluded" from the California Public Records Act "simply because they have been sent, received, or stored in a personal account.") .

This Office requests any and all information referring or related to the Project from after October 9th, 2020, including but not limited to:

(1) All Project application materials;

(2) All staff reports and related documents prepared by the City with respect to its compliance with the substantive and procedural requirements of the California Environmental Quality Act, Public Resources Code § 21000 et seq., and the CEQA Guidelines, title 14, California Code of Regulations, § 15000 et seq. (collectively "**CEQA**") and with respect to the action on the Project;

(3) All staff reports and related documents prepared by the City and written testimony or documents submitted by any person relevant to any findings or statement of overriding considerations adopted by the agency pursuant to CEQA;

O-1-1 cont'd

(4) Any transcript or minutes of the proceedings at which the decisionmaking body of the City heard testimony on, or considered any environmental document on, the Project, and any transcript or minutes of proceedings before any advisory body to the public agency that were presented to the decisionmaking body prior to action on the environmental documents or on the Project;

(5) All notices issued by the City to comply with CEQA or with any other law governing the processing and approval of the Project;

(6) All written comments received in response to, or in connection with, environmental documents prepared for the Project, including responses to the notice of preparation;

(7) All written evidence or correspondence submitted to, or transferred from, the City with respect to compliance with CEQA or with respect to the Project;

(8) Any proposed decisions or findings submitted to the decisionmaking body of the City by its staff, or the Project proponent, Project opponents, or other persons;

(9) The documentation of the final City decision and approvals, including the final environmental impact report, mitigated negative declaration, negative declaration, or notice of exemption, and all documents, in addition to those referenced in paragraph (3), cited or relied on in the findings or in a statement of overriding considerations adopted pursuant to CEQA;

(10) Any other written materials relevant to the public agency's compliance with CEQA or to its decision on the merits of the Project, including the initial study, any drafts of any environmental document, or portions thereof, that have been released for public review, and copies of studies or other documents relied upon in any environmental document prepared for the Project and either made available to the public during the public review period or included in the City 's files on the Project, and all internal agency communications, including staff notes and memoranda related to the Project or to compliance with CEQA; and

O-1-1 cont'd

(11) The full written record before any inferior administrative decisionmaking body whose decision was appealed to a superior administrative decisionmaking body prior to the filing of any litigation.

Please respond within 10 days from the date you receive this request as to whether this request specifies identifiable records not exempt from disclosure under the PRA or otherwise privileged or confidential, and are therefore subject to disclosure. This Office understands that this time may be extended up to 14 days for unusual circumstances as provided by Cal. Government Code § 6253(c), and that we will be notified of any extension and the reasons justifying it.

We request that you provide all documents in electronic format and waive any and all fees associated with this Request. SWRCC is a community-based organization. Please

notify and obtain express approval from this Office before incurring any duplication costs.

If any of the above requested documents are available online, please provide us with the URL web address at which the documents may be downloaded. If any of the requested documents are retained by the City in electronic computer-readable format such as PDF (portable document format), please provide us with pdf copies of the documents via email, or inform us of the location at which we can copy these documents electronically.

In preparing your response, please bear in mind that you have an obligation under Government Code section 6253.1 to (1) identify all records and information responsive to our request or the purpose of our request; (2) describe the information technology and physical location in which the records exist; and (3) provide suggestions for overcoming any practical basis for denying access to the records or information sought.

In responding to this request, please bear in mind that any exemptions from disclosure you may believe to be applicable are to be narrowly construed. *Marken v. Santa Monica-Malibu Unif. Sch. Dist.* (2012) 202 Cal. App. 4th 1250,1262; and may be further narrowed or eliminated by the adoption of Proposition 59, which amended article I, section 3(b)(2) of the California Constitution to direct that any "statute ... or other authority ... [that] limits the right of access" to "information concerning the conduct of the people's business" must be "narrowly construed."

O-1-1 cont'd

As for any records that you nonetheless decline to produce on the grounds of an exemption, please bear in mind that the case law under the Public Records Act imposes a duty on you to distinguish between the exempt and the non-exempt portion of any such records, and to attempt in good faith to redact the exempt portion and to disclose the balance of such documents.

Please bear in mind further that should you choose to withhold any document from disclosure, you have a duty under Government Code section 6255, subd. (a) to "justify withholding any record by demonstrating that the record in question is exempt under express provisions" of the Public Records Act or that "the public interest served by not disclosing the record clearly outweighs the public interest served by disclosure of the record."

Finally, please note that you must retain and not destroy any and all records, notwithstanding any local record retention or document destruction policies. As the Court noted in *Golden Door Properties, LLC v. Superior Court of San Diego County* (2020) 53 Cal.App.5th 733 that a public agency "must retain '[a]ll written evidence or correspondence submitted to, or transferred from' . . . with respect to" CEQA compliance or "with respect to the project."

II. NOTICE LIST REQUEST.

We also ask that you put this Office on its notice list for any and all notices issued under the CEQA and the Planning and Zoning Law.

In particular, we request that City send by mail or electronic mail notice of any and all actions or hearings related to activities undertaken, authorized, approved, permitted, licensed, or certified by the City and any of its subdivision for the Project, or supported, in whole or in part, through permits, contracts, grants, subsidies, loans, or other forms of approvals, actions or assistance, including but not limited to the following:

O-1-1 cont'd

- Notices of any public hearing held in connection with the Project; as well as
- Any and all notices prepared pursuant to CEQA, including but not limited to:
- Notices of determination that an Environmental Impact Report ("EIR") or supplemental EIR is required for a project, prepared pursuant to Public Resources Code Section 21080.4;
- Notices of availability of an EIR or a negative declaration for a project prepared pursuant to Public Resources Code Section 21152 and Section 15087 of Title 14 of the California Code of Regulations;
- Notices of approval or determination to carry out a project, prepared pursuant to Public Resources Code Section 21152 or any other provision of law;
- Notice of approval or certification of any EIR or negative declaration prepared pursuant to Public Resources Code Section 21152 or any other provision of law;

- Notice of exemption from CEQA prepared pursuant to Public Resources Code section 21152 or any other provision of law; and
- Notice of any Final EIR prepared pursuant to CEQA.

This Office is requesting notices of any approvals or public hearings under CEQA and the California Planning and Zoning Law. This request is filed pursuant to California Public Resources Code Sections 21092.2, and 21167(f) and Government Code Section 65092 requiring agencies to mail such notices to any person who has filed a written request for them with the clerk of the agency's governing body.

O-1-1 cont'd

Please send notice by regular and electronic mail to:

Mitchell M. Tsai, Attorney At Law
139 South Hudson Avenue
Suite 200
Pasadena, California 91101
Em: mitch@mitchtsailaw.com
Em: jason@mitchtsailaw.com
Em: brandon@mitchtsailaw.com
Em: hind@mitchtsailaw.com
Em: info@mitchtsailaw.com
Em: steven@mitchtsailaw.com
Em: malou@mitchtsailaw.com
Em: rebekah@mitchtsailaw.com
Em: maria@mitchtsailaw.com

We look forward to working with you. If you have any questions or concerns, please do not hesitate to contact our Office.

Sincerely,

Mitchell M. Tsai
Attorneys for Southwest Regional Council
of Carpenters

Letter O-1

COMMENTER: Southwest Regional Council of Carpenters (SWRCC)

DATE: May 13, 2022

Comment O-1-1

The commenter states CEQA case law. The commenter also states that the attached email constitutes a records request for the proposed project as well as a request to be placed on an Advanced Notice and Interested Parties List for the proposed project.

The commenter submits any and all information referring to or related to the proposed project under the California Public Records Act. This request includes all information related to the proposed project, particularly: all project information and application materials, CEQA related documents and technical reports, CEQA and City of Thousand Oaks notices, staff reports and public meeting minutes as well as transcripts, written correspondence and email communications, phone and text records, project findings, and City County decisions and approvals. The commenter requests any website links associated with the proposed project. The commenter also requests all notices files per CEQA regulations.

Response O-1-1

The Draft EIR is available on the City of Thousand Oaks' website at: Environmental Impact | Thousand Oaks, CA (toaks.org). Also, the Draft EIR document is also available at the public counter, should any member of the public want to review the physical copy. Additionally, these comments do not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. City of Thousand Oaks decision makers will consider all comments on the proposed project. No further response is necessary.

GREATER CONEJO VALLEY CHAMBER OF COMMERCE

May 19, 2022

Chair David Newman
Thousand Oaks Planning Commission
2100 Thousand Oaks Blvd
Thousand Oaks, CA 91362

Letter O-2

Re: T.O. Ranch Project – Support

Dear Chair Newman and Planning Commissioners,

On behalf of the 800 members of the Greater Conejo Valley Chamber of Commerce, I am writing in support of the T.O. Ranch project proposed by IMT. Attached to this letter you will find a packet of additional letters from many local employers also expressing their support for the T.O. Ranch Project. O-2-1

This project is a high priority for the Chamber of Commerce. As the City of Thousand Oaks continues expanding the biotech cluster in the Rancho Conejo area, potential employers have communicated two things Thousand Oaks is lacking: market rate "workforce" housing and a downtown. The young professionals who would likely comprise the workforce of these companies need market rate housing to live in and a downtown to enjoy.

IMT is proposing an excellent project to help meet both of these needs. Their site on Hampshire Road is a short walk from Thousand Oaks Blvd. The area surrounding City Hall has already been identified by city leaders as the site for a downtown with the Campus Master Plan recently identified as one of the city's top priorities. This project would place more residents in close proximity to that future downtown.

The project is comprised of 420 units, including 50 affordable units that will provide a significant amount of "workforce" housing ranging from studios to 4-bedroom townhomes and 7 live/work units. In the 6th Regional Housing Needs Allocation (RHNA) cycle, Thousand Oaks needs to plan for 2,621 housing units, 544 of which must be for low income or very low income residents.

The site of T.O. Ranch has been a vacant lot for decades. IMT is taking one of the most dilapidated sites in our city and turning it into a beautiful community. This site was one of 6 sites within the city designated as "opportunity sites" in the Economic Development Strategic Plan.

Let's take this opportunity and approve the proposal by IMT to develop T.O. Ranch.

Sincerely,

Danielle Borja, MBA
President/CEO
Greater Conejo Valley Chamber of Commerce

Amgen Inc.
1 Amgen Center Dr.
Thousand Oaks, CA. 91320
www.amgen.com

May 23, 2022

Chair David Newman
Thousand Oaks Planning Commission
2100 Thousand Oaks Blvd
Thousand Oaks, CA 91362

Re: Thousand Oaks Planning Commission Meeting: Amgen's Statement in Support of the T.O Ranch Project and Mixed-Use Properties

Dear Chair Newman and Commissioners,

More than 40 years ago, Amgen's entrepreneurial founders established their new biotechnology headquarters in what was then the small town of Thousand Oaks. These visionary scientists believed that this community was an ideal place to get their growing business off the ground as it would offer employees a high-quality location to live, work and raise their families. We are proud of how Thousand Oaks and the surrounding towns have grown over the years.

As a large recruiter of top talent from around the world and across multiple disciplines, a vital factor in deciding where to locate offices is the availability of a wide variety of housing, entertainment, and recreation options for our employees. We also strive to be located in communities in which inclusiveness is valued and our team members can feel a true sense of belonging regardless of backgrounds.

Mixed-use housing provides opportunities for all levels of employment including those wanting to put down roots in our wonderful community.

Amgen supports the community as it continues to grow, and we support innovative projects that will make this town a vibrant place for all walks of life from around the world.

Sincerely,

Steve Anderson
Executive Director, Site Lead
Amgen Thousand Oaks

HYATT
REGENCY

May 13, 2022

City of Thousand Oaks
Attn: Planning Commission
2100 Thousand Oaks Boulevard
Thousand Oaks, California 91362

RE: Thousand Oaks Ranch Project

Dear Planning Commission:

As William S. Burroughs said, "When stop growing you start dying" and nowhere are these words for apropos than in the city of Thousand Oaks. As the future success of our city hangs on the viability of a best-in-class biotech corridor, with hundreds of millions of dollars already invested, it is imperative we offer attractive and affordable housing options to those working in this sector.

This additional housing will benefit all businesses, including the vital hospitality industry, by creating more demand for our goods and services.

Approving this mixed-use development with many offsetting carbon footprint initiatives and fifty affordable housing units on a lot that has been vacant for decades would be a step in the right direction; breathing new life and vitality into Thousand Oaks and allowing us to grow our fine city thoughtfully and strategically. It has the full support of Hyatt Regency Westlake.

Regards,

David W. Barnett
Director of Sales and Marketing

cc: Danielle Borja
Adam Haverstock

HYATT REGENCY WESTLAKE PLAZA
880 South Westlake Blvd
Westlake Village, CA 91361
USA
T - 1 805 557 1234
F - 1 805 379 9392
westlake.regency.hyatt.com

WESTLAKE VILLAGE
BIOPARTNERS

May 20, 2022

Chair David Newman
Thousand Oaks Planning Commission
2100 Thousand Oaks Blvd
Thousand Oaks, CA 91362

Re: T.O. Ranch Project – Support

Dear Chair Newman and Commissioners,

On behalf of Westlake Village BioPartners, I am writing this letter of support for the T.O. Ranch project proposed by IMT on Hampshire Road. Westlake Village BioPartners is the leader in early stage venture capital for many of the start-ups that are expanding in the Thousand Oaks biotech hub, most recently Capsida Biotherapeutics in 2021.

While the Thousand Oaks biotech hub is poised for continued growth, lack of local workforce housing continues to be a substantial challenge to attract the high quality talent these start-ups need. The T.O. Ranch project will provide 420 modern housing units that will be attractive to biotech professionals with close proximity to Rancho Conejo.

We urge you to prioritize housing projects like T.O. Ranch that will lead to economic development in the biotech sector, which continues to be one of the city's top 10 goals.

Sincerely,

Sean Harper, M.D.
Managing Director
Westlake Village BioPartners

May 16, 2022

Chair David Newman
Thousand Oaks Planning Commission
2100 Thousand Oaks Blvd
Thousand Oaks, CA 91362

Re: T.O. Ranch Project – Support

Dear Chair Newman and Commissioners,

On behalf of NewMark Merrill and the Janss Marketplace, I am writing this letter of support for the T.O. Ranch project at 325 Hampshire Road. The Janss Marketplace has been a longtime fixture in the community and witnessed many chapters of change in Thousand Oaks over the past six decades.

While the Janss Marketplace as a property has continued to evolve over the years, one of our main challenges continues to be lack of housing for our local workforce. The long-term slow growth approach in Thousand Oaks has resulted in a negative population growth that effects of both the workforce and our local consumer population.

T.O. Ranch is a well-designed project that will bring 420 new housing units and create a village-like feel with the addition of dining and retail. The project has prioritized both sustainability and affordable housing as significant community benefits. It will offer a wide range of options from studios to 4-bedrooms townhomes that will make it easier to retain local employees including in the retail sector.

Sincerely,

DocuSigned by:
54556C92D2D1416...
Sandy Sigal

President and Chief Executive Officer

NewMark Merrill Companies

NewMark Merrill
COMPANIES

5850 Canoga Ave.
Suite 650
Woodland Hills, CA 91367

Tel: (818) 710-6100
Fax: (818) 710-6116

www.newmarkmerrill.com

San Diego
Los Angeles
Colorado
Orange County
Ventura County
Chicago

Development

Asset Management

Property Management

Construction

NewMark Merrill
COMPANIES

May 23, 2022

Chair David Newman
Thousand Oaks Planning Commission
2100 Thousand Oaks Blvd
Thousand Oaks, CA 91362

Re: T.O. Ranch Project – Support

Dear Chair Newman and Commissioners,

On behalf of Takeda, a major employer in Thousand Oaks, I am writing in support of the T.O. Ranch project proposed by IMT on Hampshire Road. Last year, Takeda broke ground on a new 15,000 square foot manufacturing facility to grow its portfolio of treatments for rare diseases and renovate an existing 14,000 square foot manufacturing space; a $126 million investment in our Thousand Oaks campus.

As we work to expand our footprint, one of the biggest challenges continues to be the lack of available workforce housing. The T.O. Ranch project fills a critical need with 420 modern housing units that will be attractive to biotech professionals with close proximity to Rancho Conejo.

As a global company, Takeda has a strong commitment to sustainability and is pleased that IMT has prioritized a wide variety of green initiatives including solar, water conservation and electronic charging systems. These are the types of projects that will make it easier to retain and attract the talent we need for biotech in the Conejo Valley.

Sincerely,

Katherine Harbeston
Communication Strategy Lead
Takeda Pharmaceutical Company Limited

Key Pointe
ASSET MANAGEMENT

Mailing Address:
5627 Kanan Road #244
Agoura Hills CA 91301
818-706-9479

May 18, 2022

Chair David Newman
Thousand Oaks Planning Commission
2100 Thousand Oaks Blvd
Thousand Oaks, CA 91362

Re: T.O. Ranch Project – Support

Dear Chair Newman and Commissioners,

I am writing in support of the T.O. Ranch project proposed by IMT on behalf of Key Pointe Asset Management, Inc that has managed the Gate One building on Townsgate Road for five years. It is a large commercial property whose sixteen tenants include several major local employers.

The lack of local workforce housing has a direct impact on our tenants and their employees. T.O. Ranch is an opportunity to take a vacant lot and bring 420 new housing units in close proximity to jobs in Thousand Oaks providing both economic and environmental benefits.

In addition to the housing units, 15,000 sq. ft. of dining and retail will create a vibrant village-like feel for both residents and community members to enjoy. The project has prioritized sustainability and 50 affordable housing units as significant community benefits. These are the types of projects that will make it easier to retain and attract the talent we need for our local businesses to thrive.

It is a substantial project on a parcel that has been vacant for decades and will be a huge win for the business community.

Sincerely,

John Shehorn, President

May 19, 2022

Chair David Newman
Thousand Oaks Planning Commission
2100 Thousand Oaks Blvd
Thousand Oaks, CA 91362

Re: T.O. Ranch Project – Support

Dear Chair Newman and Commissioners,

On behalf of Capsida Biotherapeutics, I am writing this letter of support for the T.O. Ranch project proposed by IMT on Hampshire Road. Capsida is a gene therapy startup company developing therapies for rare and common diseases. We are located in Thousand Oaks and pride ourselves on being part of the biotech ecosystem here in the Conejo Valley. We continue to grow and currently have ~150 employees in specialized roles such as Research and Manufacturing.

One of the biggest challenges facing the business community in the City of Thousand Oaks is the lack of housing for our local workforce. This is causing our employees to live in other communities which also leads to longer commutes. Not only is this a burden on our employees, but it contributes to traffic and environmental issues.

T.O. Ranch is a beautiful project that will bring a large number of new housing units and create a village like feel with the addition of dining and retail. The project has prioritized both sustainability and affordable housing as significant community benefits. These are the types of projects that will make it easier to retain and attract the talent we need for the growing biotech hub in Rancho Conejo.

Recruiting top-tier individuals for critical scientific and technical roles is challenging. Capsida can better succeed at hiring and bringing talent to our biotech community if there are affordable, attractive, convenient housing options.

I urge you to approve the T.O. Ranch Project and help support the businesses and future residents of Thousand Oaks.

Sincerely,

Jessica McIntyre
VP Business Operations
Capsida Biotherapeutics, Inc

OAKS CHRISTIAN SCHOOL

May 19, 2022

Chair David Newman
Thousand Oaks Planning Commission
2100 Thousand Oaks Blvd
Thousand Oaks, CA 91362

Re: T.O. Ranch Project – Support

Dear Chair Newman and Commissioners,

On behalf of Oaks Christian School, I am writing this letter of support for the T.O. Ranch project proposed by IMT at 325 Hampshire Road. Oaks Christian School is currently home to a middle and high school campus serving over 1500 students. Most recently, the Board of Trustees approved the expansion to become a full-fledged TK-12 school and this expansion will lead to both a larger student population and a larger staff.

One of the biggest challenges locally to accommodate a growing workforce is the lack of housing. The T.O. Ranch project will provide 420 housing units that will be attractive to staff that Oaks Christian School is looking to both retain and attract and less than 2 miles from our campus.

Let's take this opportunity to turn a vacant lot into an attractive mixed-use project that our community can be proud of. The project has prioritized both sustainability and 50 affordable housing units as significant community benefits. These are the types of projects that will make it easier to retain and attract the talent we need for education in Conejo Valley.

I urge you to approve the T.O. Ranch Project that will benefit businesses and residents alike.

Sincerely,

Robert T. Black
President / Head of School
Oaks Christian School

31749 La Tienda Drive ✦ Westlake Village, CA 91362 ✦ 818.575.9900 ✦ Fax: 818.575.9951 ✦ www.oakschristian.org

techahead

+1 818 318 0727
28720 Roadside Dr, STE 254,
Agoura Hills, CA 91301

May **18**, 2022

Chair David Newman
Thousand Oaks Planning Commission
2100 Thousand Oaks Blvd
Thousand Oaks, CA 91362

Re: T.O. Ranch Project – Support

Dear Chair Newman and Commissioners,

As a business owner in Agoura Hills and a resident of Thousand Oaks, I am writing this letter of support for the T.O. Ranch project by IMT. TechAhead empowers start-ups, businesses, and corporations to leverage the power of technology for growth, including mobile and web app development.

As part of the Conejo Valley business community, lack of housing continues to be a considerable challenge for our local workforce especially for our young professionals. T.O. Ranch is an opportunity to take a vacant lot and create a beautiful mixed-use project with housing solutions ranging from studio apartments to 4-bedroom townhouses.

It's a well-designed project that will create a community feel with the addition of dining, retail and even a dog park. The project has prioritized sustainability and will include 50 affordable housing units, both substantial community benefits. These are the types of projects that will make it easier to retain local employees and homegrown talent including in the technology sector.

Sincerely,

Vikas Kaushik
CEO
TechAhead

PEPPERDINE

Office of the Senior Vice Chancellor

May 17, 2022

Chair David Newman
Thousand Oaks Planning Commission
2100 Thousand Oaks Blvd
Thousand Oaks, CA 91362

Re: T.O. Ranch Project – Support

Dear Chair Newman and Commissioners,

As a local area resident and member of the business community, I support the T.O. Ranch project located at 325 Hampshire Road.

This former Kmart site has been vacant for more than two decades and T.O. Ranch is an ideal model of the type of project envisioned for the site. Currently, our population as a city and a county is declining, impacting labor for our local workforce. With economic growth in Thousand Oaks coming from the biotech sector, additional housing will benefit our existing and future businesses. These professionals want attractive housing options, and yet not everyone wants or can afford a single-family home. With more than 420 apartments and townhomes, 50 of which are affordable housing units, the T.O. Ranch project will provide the housing needed to attract and retain our local workforce. On a personal note, I am pleased that the project includes extensive green initiatives, including LEED building certification, EV charging stations, rooftop solar, and native landscaping.

Thank you in advance for your consideration of this important project.

Best regards,

Rick M. Gibson
Senior Vice Chancellor
Pepperdine University

Letter O-2

COMMENTER: Greater Conejo Valley Chamber of Commerce

DATE: May 19, 2022

Comment O-2-1

The commenter states that the ten attached letters as well as the 800 members of the Greater Conejo Valley Chamber of Commerce are in support of the proposed project since it would add to the City of Thousand Oaks' business and residential growth.

Response O-2-1

Comment noted. This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. City of Thousand Oaks decision makers will consider all comments on the proposed project. No further response is necessary.

Letter O-3

May 23, 2022

Via Email

Carlos Contreras, Senior Planner
Planning Division
City of Thousand Oaks
2100 Thousand Oaks Boulevard
Thousand Oaks, CA 91362
ccontreras@toaks.org

Re: Comment on Draft Environmental Impact Report, Thousand Oaks (T.O.) Ranch Mixed-Use and Multi-Family Residential Redevelopment Project (SCH 2021120559)

Dear Mr. Contreras:

I am writing on behalf of Supporters Alliance for Environmental Responsibility ("SAFER") regarding the Draft Environmental Impact Report ("DEIR") prepared for the Thousand Oaks (T.O.) Ranch Mixed-Use and Multi-Family Residential Redevelopment Project (SCH 2021120559), including all actions related or referring to the demolition of existing buildings on the site and the development of an 841,153 square foot site with 420 residential units, 15,000 square feet of commercial uses, 203,172 square feet of open space and amenities, surface parking, and two subterranean parking structures, located at 325 and 391 Hampshire Road in the City of Thousand Oaks ("Project").

A Draft Environmental Impact Report was released on April 8, 2022 and made available for public comment until May 23, 2022. As of the date of this letter, a Final EIR has not been issued. Yet the City's May 23, 2022 Planning Commission Agenda Item 8.A provides that the Planning Commission will be holding a hearing and potentially voting to approve the Project despite the fact that the EIR has not been finalized and certified. Apprving any aspect of the Project before the City has certified the EIR would violate CEQA. Doing so would violate CEQA. (Pub. Res. Code §21091(f); CEQA Guidelines §15074(d); *Citizens for Responsible Government v. City of Albany* (1997) 56 Cal.App.4th 1199.) O-3-1

Even though additional approvals may be required, CEQA review is required prior to the first agency approval of a project, when the agency commits itself to a definite course of action. (*Save Tara v. City of West Hollywood* (2008) 45 Cal. 4th 116, 137-138.) If the City were to approve the Project prior to completing CEQA review, a court would be required to rescind the Project approval. "[T]he public must be given an adequate opportunity to O-3-2

comment on that presentation before the decision to go forward is made." (*Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 449-450.) "[S]ubstantial rather than complete compliance with CEQA-mandated notice procedures [is] an abuse of discretion requiring vacating of the administrative decision." (*Environmental Protection Information Center, Inc. v. Johnson* (1985) 170 Cal. App. 3d 604, 622.) Accordingly, approving any aspect of the Project prior to certification of the EIR violates CEQA.

O-3-2 cont'd

In addition, after reviewing the DEIR, we conclude that the DEIR fails as an informational document and fails to impose all feasible mitigation measures to reduce the Project's impacts. SAFER requests that the Planning Division address these shortcomings in a revised draft environmental impact report and recirculate it prior to considering approvals for the Project.

O-3-3

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

Sincerely,

Rebecca Davis
Lozeau Drury LLP

Letter O-3

COMMENTER: Lozeau Drury for Supporters Alliance for Environmental Responsibility ("SAFER")

DATE: May 23, 2022

Comment O-3-1

The commenter presents the dates that the Draft EIR was released for public review and comment. The commenter cites CEQA case laws. The commenter states that the City of Thousand Oaks' agenda for the May 23, 2022, Planning Commission meeting states that the Planning Commission would be voting to approve the proposed project. The commenter also states that project approval by the Planning Commission prior to finalizing and certifying the proposed project EIR would violate CEQA.

Response O-3-1

These comments have been noted. The Planning Commission meeting for May 23, 2022 has been continued to June 8, 2022. The commenter incorrectly states that the Planning Commission will approve the project. Instead, in its advisory capacity, the Planning Commission will provide a recommendation to City Council who will make the final decision on the project and certify the Final EIR. This Final EIR has been prepared in compliance with CEQA and has been submitted to and reviewed by the City Council prior to its certification.

Comment O-3-2

The commenter states CEQA review is required prior to the first agency approval of a project, when the agency commits itself to a definite course of action. (*Save Tara v. City of West Hollywood* (2008) 45 Cal. 4th 116, 137-138.) If the City were to approve the Project prior to completing CEQA review, a court would be required to rescind the Project approval. "[T]he public must be given an adequate opportunity to comment on that presentation before the decision to go forward is made." The commenter cites CEQA case law and notes that CEQA review is required prior to approval of any aspect of the project.

Response O-3-2

These comments have been noted. The Planning Commission meeting for May 23, 2022 has been continued to June 8, 2022. The commenter incorrectly states that the Planning Commission will approve the project. Instead, in its advisory capacity, the Planning Commission will provide a *recommendation* to City Council who will make the final decision on the project and certify the Final EIR. This Final EIR has been prepared in compliance with CEQA and has been submitted to and reviewed by the City Council prior to its certification.

Comment O-3-3

The commenter states that the Draft EIR fails as an informational document and fails to impose feasible mitigation measures to reduce the proposed project impacts. The commenter requests that a revised Draft EIR be prepared and recirculated prior to project approval, and cites CEQA case law about preservation of the right to supplement comments during review of the Final EIR.

Response O-3-3

These comments are noted. The Draft EIR with feasible mitigation measures to address potential impacts is available on the City of Thousand Oaks' website at: Environmental Impact | Thousand Oaks, CA (toaks.org). Also, the Draft EIR document is also available at the public counter, should any member of the public want to review the physical copy. The commenter provides no detail whatsoever about potential impacts and thus does not provide a fair argument. No revisions of the Draft EIR are needed to address this comment and no further response is necessary.

VIA E-MAIL

Letter O-4

May 23, 2022

Carlos Contreras, Senior Planner
City of Thousand Oaks
2100 Thousand Oaks Boulevard
Thousand Oaks, CA 91362
Em: ccontreras@toaks.org

RE: City of Thousand Oaks, The T.O. Ranch Mixed-Use and Multi-Family Residential Development Project DEIR Comment Letter

Dear Carlos Contreras,

On behalf of the Southwest Regional Council of Carpenters ("SWRCC" or "Southwest Carpenters"), my Office is submitting these comments on the City of Thousand Oaks' ("City" or "Lead Agency") Draft Environmental Impact Report ("DEIR") for The T.O. Ranch Mixed-Use and Multi-Family Residential Development Project (the "Project").

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

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

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

O-4-1

SWRCC incorporates by reference all comments raising issues regarding the EIR submitted prior to certification of the EIR for the Project. *Citizens for Clean Energy v City of Woodland* (2014) 225 Cal.App.4th 173, 191 (finding that any party who has objected to the Project's environmental documentation may assert any issue timely raised by other parties).

Moreover, SWRCC requests that the Lead Agency provide notice for any and all notices referring or related to the Project issued under the California Environmental Quality Act ("CEQA"), PRC § 21000 *et seq*, and the California Planning and Zoning Law ("PZL"), CGC §§ 65000–65010. PRC §§ 21092.2, and 21167(f) and CGC § 65092 require agencies to mail such notices to any person who has filed a written request for them with the clerk of the agency's governing body. O-4-2

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

Community benefits such as local hire and skilled and trained workforce requirements can also be helpful to reduce environmental impacts and improve the positive economic impact of the Project. Local hire provisions requiring that a certain percentage of workers reside within 10 miles or less of the Project Site can reduce the length of vendor trips, reduce greenhouse gas emissions and providing localized economic benefits. Local hire provisions requiring that a certain percentage of workers reside within 10 miles or less of the Project Site can reduce the length of vendor trips, reduce greenhouse gas emissions and providing localized economic benefits. As environmental consultants Matt Hagemann and Paul E. Rosenfeld note: O-4-3

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

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

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

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

O-4-3 cont'd

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

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

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

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

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

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

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

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

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

O-4-3 cont'd

> In nearly built-out Berkeley, CA, the approach to balancing jobs and housing is to create local jobs rather than to develop new housing.” The city’s First Source program encourages businesses to hire local residents, especially for entry- and intermediate-level jobs, and sponsors vocational training to ensure residents are employment-ready. While the program is voluntary, some 300 businesses have used it to date, placing more than 3,000 city residents in local jobs since it was launched in 1986. When

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

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

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

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

needed, these carrots are matched by sticks, since the city is not shy about negotiating corporate participation in First Source as a condition of approval for development permits.

The City should consider utilizing skilled and trained workforce policies and requirements to benefit the local area economically and mitigate greenhouse gas, air quality and transportation impacts. O-4-3 cont'd

The City should also require the Project to be built to standards exceeding the current 2019 California Green Building Code to mitigate the Project's environmental impacts and to advance progress towards the State of California's environmental goals. O-4-4

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

A. Background Concerning the California Environmental Quality Act

CEQA has two basic purposes. First, CEQA is designed to inform decision makers and the public about the potential, significant environmental effects of a project. 14 California Code of Regulations ("CCR" or "CEQA Guidelines") § 15002(a)(1).[8] "Its purpose is to inform the public and its responsible officials of the environmental consequences of their decisions *before* they are made. Thus, the EIR 'protects not only the environment but also informed self-government.' [Citation.]" *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 564. The EIR has been described as "an environmental 'alarm bell' whose purpose it is to alert the public and its responsible officials to environmental changes before they have reached ecological points of no return." *Berkeley Keep Jets Over the Bay v. Bd. of Port Comm'rs.* (2001) 91 Cal.App.4th 1344, 1354 ("*Berkeley Jets")*; *County of Inyo v. Yorty* (1973) 32 Cal.App.3d 795, 810. O-4-5

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

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

of California (1988) 47 Cal.3d 376, 400. The EIR serves to provide public agencies and the public in general with information about the effect that a proposed project is likely to have on the environment and to "identify ways that environmental damage can be avoided or significantly reduced." CCR § 15002(a)(2). If the project has a significant effect on the environment, the agency may approve the project only upon finding that it has "eliminated or substantially lessened all significant effects on the environment where feasible" and that any unavoidable significant effects on the environment are "acceptable due to overriding concerns" specified in CEQA § 21081. CCR § 15092(b)(2)(A–B).

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

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

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

B. CEQA Requires Revision and Recirculation of an Environmental Impact Report When Substantial Changes or New Information Comes to Light

To afford the public an opportunity to review and comment on an EIR, "[w]hen significant new information is added to an environmental impact report after notice has been given pursuant to Section 21092 … but prior to certification, the public agency shall give notice again pursuant to PRC § 21092, and consult again pursuant to Sections 21104 and 21153 before certifying the environmental impact report" in accordance with PRC § 21092.1. CCR § 15088.5.

Significant new information includes "changes in the project or environmental setting as well as additional data or other information" that "deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative)." CCR § 15088.5(a). Examples of significant new information requiring recirculation include "new significant environmental impacts from the project or from a new mitigation measure," "substantial increase in the severity of an environmental impact," "feasible project alternative or mitigation measure considerably different from others previously analyzed" as well as when "the draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded." *Id.* O-4-7

An agency has an obligation to recirculate an environmental impact report for public notice and comment due to "significant new information" regardless of whether the agency opts to include it in a project's environmental impact report. *Cadiz Land Co. v. Rail Cycle* (2000) 83 Cal.App.4th 74, 95 [finding that in light of a new expert report disclosing potentially significant impacts to groundwater supply "the EIR should have been revised and recirculated for purposes of informing the public and governmental agencies of the volume of groundwater at risk and to allow the public and governmental agencies to respond to such information."]. If significant new information was brought to the attention of an agency prior to certification, an agency is required to revise and recirculate that information as part of the environmental impact report.

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

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

Public health risks related to construction work requires a mandatory finding of significance under CEQA. Construction work has been defined as a Lower to High-risk activity for COVID-19 spread by the Occupations Safety and Health Administration. Recently, several construction sites have been identified as sources of community spread of COVID-19.[9] O-4-8

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

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

Construction Site Design:

- The Project Site will be limited to two controlled entry points.
- Entry points will have temperature screening technicians taking temperature readings when the entry point is open. O-4-9
- The Temperature Screening Site Plan shows details regarding access to the Project Site and Project Site logistics for conducting temperature screening.

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

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

Testing Procedures:

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

O-4-9 cont'd

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

Planning

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

O-4-9 cont'd

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

SWRCC has also developed a rigorous Infection Control Risk Assessment ("**ICRA**") training program to ensure it delivers a workforce that understands how to identify and

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

control infection risks by implementing protocols to protect themselves and all others during renovation and construction projects in healthcare environments.[11]

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

O-4-9 cont'd

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

D. The DEIR Fails to Consider and Analyze all Feasible, Practical and Effective Mitigation Measures for Significant and Unavoidable

Although the DEIR recognizes impacts to noise, transportation, housing, and hazards as significant and unavoidable, it fails to consider all feasible, practical, and effective feasible mitigation measures under PRC §§ 21061, 21100(b)(3); see also *Napa Citizens for Honest Gov't v. Napa County Bd. Of Supervisors* (2001) 91 Cal.4th 1018, 1039.

The DEIR is required to review all feasible, practical, and effective mitigation measures as the DEIR concludes that the Project would have significant and unavoidable impacts to several domains identified in the DEIR. However, the DEIR fails to provide a feasibility analysis for mitigation measures that could conceivably reduce the Project's impacts to culture to less than significant levels. For example, the Project could adopt measures to mitigate noise rather than disrupt nearby sensitive receptors, or expand surrounding roads to increase ease of access and traffic. Without a feasibility analysis of more stringent mitigation measures, the DEIR fails as an informational document.

O-4-10

E. The DEIR Fails to Support Its Findings With Substantial Evidence

When new information is brought to light showing that an impact previously discussed in the DEIR but found to be insignificant with or without mitigation in the DEIR's analysis has the potential for a significant environmental impact supported by substantial evidence, the EIR must consider and resolve the conflict in the evidence. See *Visalia Retail, L.P. v. City of Visalia* (2018) 20 Cal.App.5th 1, 13, 17; see also *Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal.App.4th 1099, 1109. While a lead agency has discretion to formulate standards for determining significance

O-4-11

[11] For details concerning SWRCC's ICRA training program, *see* https://icrahealthcare.com/.

and the need for mitigation measures—the choice of any standards or thresholds of significance must be "based to the extent possible on scientific and factual data and an exercise of reasoned judgment based on substantial evidence. CCR § 15064(b); *Cleveland Nat'l Forest Found. v. San Diego Ass'n of Gov'ts* (2017) 3 Cal.App.5th 497, 515; *Mission Bay Alliance v. Office of Community Inv. & Infrastructure* (2016) 6 Cal.App.5th 160, 206. And when there is evidence that an impact could be significant, an EIR cannot adopt a contrary finding without providing an adequate explanation along with supporting evidence. *East Sacramento Partnership for a Livable City v. City of Sacramento* (2016) 5 Cal. App. 5th 281, 302.

In addition, a determination that regulatory compliance will be sufficient to prevent significant adverse impacts must be based on a project-specific analysis of potential impacts and the effect of regulatory compliance. In *Californians for Alternatives to Toxics v. Department of Food & Agric.* (2005) 136 Cal. App. 4th 1, the court set aside an EIR for a statewide crop disease control plan because it did not include an evaluation of the risks to the environment and human health from the proposed program but simply presumed that no adverse impacts would occur from use of pesticides in accordance with the registration and labeling program of the California Department of Pesticide Regulation. See also *Ebbetts Pass Forest Watch v Department of Forestry & Fire Protection* (2008) 43 Cal.App.4th 936, 956 (fact that Department of Pesticide Regulation had assessed environmental effects of certain herbicides in general did not excuse failure to assess effects of their use for specific timber harvesting project). O-4-11 cont'd

1. *The DEIR Fails to Support its Findings on Greenhouse Gas Impacts with Substantial Evidence*

CCR § 15064.4 allow a lead agency to determine the significance of a project's GHG impact via a qualitative analysis (e.g., extent to which a project complies with regulations or requirements of state/regional/local GHG plans), and/or a quantitative analysis (e.g., using model or methodology to estimate project emissions and compare it to a numeric threshold). So too, CEQA Guidelines allow lead agencies to select what model or methodology to estimate GHG emissions so long as the selection is supported with substantial evidence, and the lead agency "should explain the limitations of the particular model or methodology selected for use." CCR § 15064.4(c). O-4-12

CCR §§ 15064.4(b)(3) and 15183.5(b) allow a lead agency to consider a project's consistency with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

CCR §§ 15064.4(b)(3) and 15183.5(b)(1) make clear qualified GHG reduction plans or CAPs should include the following features:

(1) **Inventory**: Quantify GHG emissions, both existing and projected over a specified time period, resulting from activities (e.g., projects) within a defined geographic area (e.g., lead agency jurisdiction);

(2) **Establish GHG Reduction Goal**: Establish a level, based on substantial evidence, below which the contribution to GHG emissions from activities covered by the plan would not be cumulatively considerable;

(3) **Analyze Project Types**: Identify and analyze the GHG emissions resulting from specific actions or categories of actions anticipated within the geographic area;

(4) **Craft Performance Based Mitigation Measures**: Specify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level;

(5) **Monitoring**: Establish a mechanism to monitor the CAP progress toward achieving said level and to require amendment if the plan is not achieving specified levels;

O-4-12 cont'd

Collectively, the above-listed CAP features tie qualitative measures to quantitative results, which in turn become binding via proper monitoring and enforcement by the jurisdiction—all resulting in real GHG reductions for the jurisdiction as a whole, and the substantial evidence that the incremental contribution of an individual project is not cumulatively considerable.

Here, the DEIR concludes consistency with the SCAG's 2016-2040 statewide plans to reduce GHG emissions but does not identify consistency with the 2020-2045 plan (DEIR 4.7-17-24). However, the DEIR materials includes an Appendix B titled "Air Quality Monitoring," wherein some attempt at quantification via modelling was done. It includes what appear to be calculations of GHG emissions and CO2e numbers which are not discussed anywhere in the DEIR. Additionally, as noted above, the DEIR fails to analyze GHG emissions from sources outside of the "Focus Area" to which the DEIR was limited. The DEIR must be revised to consider the environmental impacts of GHG emissions from the whole project.

2. *The DEIR is Required to Consider and Adopt All Feasible Air Quality and GHG Mitigation Measures*

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

If the project has a significant effect on the environment, the agency may approve the project only upon finding that it has "eliminated or substantially lessened all significant effects on the environment where feasible" and find that 'specific overriding economic, legal, social, technology or other benefits of the project outweigh the significant effects on the environment." "A gloomy forecast of environmental degradation is of little or no value without pragmatic, concrete means to minimize the impacts and restore ecological equilibrium." *Environmental Council of Sacramento v. City of Sacramento* (2006) 142 Cal.App.4th 1018, 1039.

Here, the DEIR finds that the Project will have no significant and unavoidable impacts on air quality and greenhouse gas emissions, for several reasons, one of which is the consistency with the 2016 Ventura County AQMP population increase estimates. (DEIR 4.2-16) which is conclusory and evades the analysis under CEQA. Even assuming the Project may take credit for all the claimed VMT reductions it outlines, the Project will still have a significant GHG emissions impact which requires that the DEIR adopt a finding of a significance and the adoption of all feasible mitigation measures to ameliorate this impact. Instead, the DEIR again defers discussion of air quality and greenhouse gas emissions to the future, or never, and relies on the faulty inference that its impacts can be masked and assimilated under the guise of global climate change analysis.

O-4-13

The City is merely making a conclusory statement about future compliance with the law and does not commit itself to any specific or binding course of action which is project-specific. A determination that regulatory compliance will be sufficient to prevent significant adverse impacts must be based on a project-specific analysis of potential impacts and the effect of regulatory compliance. *In Californians for Alternatives to Toxics v. Department of Food & Agric.* (2005) 136 Cal.App.4th 1, the court set aside an EIR for a statewide crop disease control plan because it did not include an evaluation of the risks to the environment and human health from the proposed program but

simply presumed that no adverse impacts would occur from use of pesticides in accordance with the registration and labeling program of the California Department of Pesticide Regulation. There is no analysis in the DEIR connecting the effect of compliance with regulatory requirements such that the impacts could be determined to be less than significant. The City is essentially requesting a good-faith assumption that regulatory compliance will serve as a backstop without developing any mitigation measures. The City must identify mitigations. It is insufficient to say that none is needed because the analysis would be subsumed by global climate change context.

O-4-13 cont'd

3. *The DEIR Provides Inadequate Population and Housing Impact Analysis*

The DEIR provides inadequate analysis to housing impacts, despite the nearly 420 proposed units and 50 low-income units that will significantly increase population density in the area. (DEIR 2.6; 2-12/15) It is therefore necessary to perform a housing impact analysis, especially considering the site's existing vacant commercial building that will result in a significant population increase in the area, not only due to the housing development but also because of the additional patronage from the reintroduction of commercial uses and planned pedestrian access. An agency may not avoid its responsibility to prepare proper environmental analysis by failing to gather relevant data. *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, 311. Here, there are clear housing impacts because of the nature of the Project, and the City is obligated to include housing impacts in its environmental impact analysis.

O-4-14

While an analysis is provided, it indicates that the population increase is within the projected population estimates under the SCAG 2045 plan. However this estimate and analysis does not include the Project's contribution per annum and instead evaluates and estimates an approximate its overall increase and contribution increase of 1,121 residents of total growth until 2045, and which would constitute almost half of the Thousand Oaks 2021-2029 Housing Element allotment, while only providing a 12% provision of low-income units for the area (DEIR 4.11-5-7).

Based on this, the DEIR concludes the population growth would be within estimated SCAG regional forecast and impacts would be less than significant. (DEIR 4.11-8) However the Project's contribution per annum could be well in excess of annual contributions to population growth and occupies nearly half of the growth attributions in the Thousand Oaks Housing Element for the next seven years. As such, the City should attend to proper estimates of the Project's overall contributions.

F. The DEIR's Transportation and Traffic Analysis Is Insufficient and Inconsistent

The DEIR analyzes potential transportation and traffic impacts relating to the Project. (DEIR 4.14). It recognizes the existing street network and availability to public transit and adjacent highways, and specifically the 101 freeway to the north, and pedestrian networks. (DEIR 4.14.1) Despite this, the DEIR provides insufficient analysis of transportation and traffic impacts caused by the Project.

For instance, the City of Thousand Oaks Active Transportation Plan lists as a goal the development of an active transportation friendly environment. (DEIR 4.14-8) However the Project is being built adjacent to a well-traveled road in Thousand Oaks and plans to add over 1000 residents and significant patronage who will require transportation either through public transit, car, or otherwise. These nontrivial increases will necessarily add stress to the nearby freeway and roads, and especially the already-congested Moorpark Road and 101 Freeway offramp nearby and Hampshire Road and the other businesses and schools identified surrounding the Project site. The DEIR nonetheless concludes that impacts to transportation and traffic would be less-than-significant The An agency may not avoid its responsibility to prepare proper environmental analysis by failing to gather relevant data. *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, 311. The DEIR is obligated to attend to these considerations but does not do so. SWRCC requests the City reconsider and incorporate deeper analysis as it pertains to transportation and traffic.

O-4-15

G. The DEIR Fails to Adequately Disclose and Analyze the Project's Significant Noise Impacts

The DEIR discloses that the Project will have significant and unavoidable noise impacts and proposes mitigation measures that provide no or insufficient mitigation to sensitive receptors and the Project's contribution to noise increases in the area. (DEIR 4.10-18).

O-4-16

The DEIR fails to adequately analyze all of the Project's significant noise impacts. For example, the Project's analysis excludes the impacts of the at least seven (7) nearby sensitive receptors, especially the Little Dreamers Preschool and Windsor Terrace of Westlake Village convalescent home, and the excessive noise levels that will impact these many receptors, especially concerning the planned demolition and planned residential and commercial uses and increased pedestrian traffic (DEIR 4.10-18; MM

NOI-1). These are significant noise generating activities whose mitigation is missing entirely or defers mitigation through adjustments to construction equipment (DEIR 4.10-18). An agency may not avoid its responsibility to prepare proper environmental analysis by failing to gather relevant data. *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, 311.

O-4-16 cont'd

Despite recognizing the significant and unavoidable noise impacts to the nearby sensitive receptors for both the Project's construction and the day-to-day use of the Project upon completion, it nonetheless provides no additional mitigation and still concludes that none is required. (DEIR 4.10-19). The Project must provide sufficient mitigation for these significant noise impacts.

O-4-17

H. The DEIR Fails to Adequately Disclose and Analyze the Project's Significant Hazards and Wildfire Impacts

The DEIR identifies hazards and hazardous materials in its analysis (DEIR 4.8-1) and identifies nearby routes to transport hazards and hazardous materials outside of the Project site (DEIR 4.8-3) to the nearby 126, 118, 101, 1, and local roads, as well as recognizes the demolition of a building that is known to contain hazardous materials like asbestos and lead. (DEIR 4.8-12) Despite the presence of not only nearby sensitive receptors, businesses, and other residences, the DEIR concludes no mitigation is required without also providing detailed analysis or Project specific metrics on the transportation and demolition of the building beyond consistency with steps outlined in the Thousand Oaks Municipal Code. (DEIR 4.8-13) An agency may not avoid its responsibility to prepare proper environmental analysis by failing to gather relevant data. *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, 311. The City must provide sufficient analysis to the transportation and management of hazards and hazardous materials given the proximity of the Project to nearby sensitive receptors, residential communities, and local businesses.

O-4-18

The area of Thousand Oaks is especially sensitive to wildfires, and therefore particular attention needs to be paid to this analysis. As the DEIR recognizes, the Project site is in a "Very High" Fire Severity Zone. (DEIR 4.16-4) Yet the DEIR only indicates consistency with state and local fire and hazard mitigation and emergency plans and that impacts would be less-than-significant and no mitigation would be required. (DEIR 4.16-12) The Project and its corresponding construction will involve the demolition of a large and abandoned commercial building, increase traffic congestion with obstructing construction vehicles, and will otherwise increase fire danger through

O-4-19

various construction activities. The DEIR needs to provide Project-specific analysis and details to adequately attend to fire and emergency protocols to protect the surrounding sensitive receptors and local residences and businesses. An agency may not avoid its responsibility to prepare proper environmental analysis by failing to gather relevant data. *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, 311.

O-4-19 cont'd

I. The DEIR Fails to Adequately Disclose and Analyze the Project's Significant Biological Impacts

The DEIR finds that the Project will have less than significant impacts despite recognizing the presence of ten City Protected coast live oak and two City protected sycamore trees present on the Project site (DEIR 4.3-10/11) and attention to the City's Oak Tree Preservation and Protection Guidelines and Oak and Landmark Tree Ordinance (DEIR 4.3-11). The mitigation indicates impact in the form of removal of six oak trees and potential presence of nesting birds (DEIR 4.3-8). The City defers to mitigation in the form of replacing the trees at a 3:1 ratio pursuant to code to the City's Tree Protection Guidelines. However, although six oak trees will be removed and eighteen (18) are planned to be planted in their stead, there is no analysis done on the likelihood of the planted oaks reaching maturity to fully account for the removal of the six oak trees, or what preservation measures will be done to ensure the survival and livelihood of the remaining four oak trees. A full analysis of the oak tree mitigation measure, as well as finding non-deferred mitigation An agency may not avoid its responsibility to prepare proper environmental analysis by failing to gather relevant data. *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, 311.

O-4-20

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

A. Background Regarding the State Planning and Zoning Law

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

O-4-21

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

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

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

O-4-22

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

A project cannot be found consistent with a general plan if it conflicts with a general plan policy that is "fundamental, mandatory, and clear," regardless of whether it is consistent with other general plan policies. See *Endangered Habitats League v. County of Orange* (2005) 131 Cal.App.4th 777, 782-83; *Families Unafraid to Uphold Rural El Dorado County v. Bd. of Supervisors* (1998) 62 Cal.App.4th 1332, 1341-42 ("FUTURE"). Moreover, even in the absence of such a direct conflict, an ordinance or development project may not be approved if it interferes with or frustrates the general plan's policies and objectives. See *Napa Citizens*, 91 Cal.App.4th at 378-79; see also *Lesher*, 52 Cal.3d at 544 (zoning ordinance restricting development conflicted with growth-oriented policies of general plan).

As explained in full below, the Project is inconsistent with the City's Central City Community Plan, ("Community Plan"). As such, the Project violates the State Planning and Zoning law.

1. *The Project is Inconsistent with the General Plan, and thus the DEIR's Conclusions Regarding Impacts on Land Use and Planning are Unsupported by Substantial Evidence*

O-4-23

The DEIR fail to establish the Project's consistency with several Community Plan goals, policies, and programs including the following (DEIR 4.9-6-12):

- To provide and maintain a system of natural open space and trails;
- To develop appropriate additional tools enabling commercial, industrial and residential development to flourish in an efficient and compatible manner.
- To provide high quality environment, healthful and pleasing to the senses, which values the relationship between maintain of ecological systems and people's general welfare.
- The City's unique natural setting will be a guide to its future physical shape … the City will support and encourage open space/greenbelt buffers around it, separating the City from adjoining communities.

O-4-24

- Low profile and aesthetically designed signage shall be allowed for all developments; no billboards shall be allowed.
- Strive to provide a balanced range of adequate housing for Thousand Oaks Planning Area residents in a variety of locations for all individuals regardless of age, income, ethnic background, marital status, physical or developmental disability.
- Provide a wide range of housing opportunities for persons of all income levels.
- Provide housing opportunities for persons with special needs.
- A City-wide system of pedestrian and bicycle facilities that provide safe, continuous accessibility to all residential, commercial, and industrial areas, to the trail system and to the scenic bike route system shall be provided and maintains.

- Achieve and maintain an environment in which noise-sensitive uses are not disturbed by noise that exceeds exposure guidelines in this Noise Element.

The Project fails to discuss its conformity with each of the aforementioned Goals, Policies, and Programs laid out in the City's Community Plan, even though the Project will have reasonably foreseeable impacts on land use, traffic, vehicle trip generation, air quality, and emissions. This discussion is relevant not only to compliance with land use and zoning law, but also with the contemplation of the Project's consistency with land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating environmental impacts. The DEIR should be amended to include analysis of the Project's comportment with the Goals, Policies, and Programs listed above. O-4-25

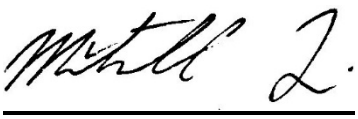
B. <u>The DEIR Should be Revised to Consider the Project's Consistency with the Upcoming Revisions to the City's Housing Element</u>

The DEIR includes discussion of the Project's consistency with the City's present housing element. However, the City recently adopted housing element on January 22, 2022 of the 2021-2029 Housing Element. As development of the Project area will take place during the upcoming planning period and not the current period, the DEIR should include an analysis of the Project's consistency with the upcoming Housing Element update and its various policies and programs. O-4-26

III. CONCLUSION

The Southwest Carpenters request that the City revise and recirculate the Project's environmental impact report to address the aforementioned concerns. If the City has any questions or concerns, feel free to contact my Office. O-4-27

Sincerely,



Mitchell M. Tsai
Attorneys for the Southwest
Regional Council of Carpenters

Attached:

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

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

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

EXHIBIT A

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

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

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

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

March 8, 2021

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

Subject: Local Hire Requirements and Considerations for Greenhouse Gas Modeling

Dear Mr. Tsai,

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

Worker Trips and Greenhouse Gas Calculations

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

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

[1] "California Emissions Estimator Model." CAPCOA, 2017, *available at:* http://www.aqmd.gov/caleemod/home.
[2] "California Emissions Estimator Model." CAPCOA, 2017, *available at:* http://www.aqmd.gov/caleemod/home.
[3] "CalEEMod User's Guide." CAPCOA, November 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4, p. 34.

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

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

> "$VMT_d = \Sigma(\text{Average Daily Trip Rate}_i * \text{Average Overall Trip Length}_i)_n$
>
> Where:
>
> n = Number of land uses being modeled."[5]

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

> "$\text{Emissions}_{pollutant} = VMT * EF_{running,pollutant}$
>
> Where:
>
> $\text{Emissions}_{pollutant}$ = emissions from vehicle running for each pollutant
>
> VMT = vehicle miles traveled
>
> $EF_{running,pollutant}$ = emission factor for running emissions."[6]

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

Default Worker Trip Parameters and Potential Local Hire Requirements

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

[4] "Appendix A Calculation Details for CalEEMod." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 14-15.
[5] "Appendix A Calculation Details for CalEEMod." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 23.
[6] "Appendix A Calculation Details for CalEEMod." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 15.
[7] "CalEEMod User's Guide." CAPCOA, November 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4, p. 34.
[8] CalEEMod User Guide, *available at:* http://www.caleemod.com/, p. 1, 9.

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

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

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

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

[9] "CalEEMod User's Guide." CAPCOA, November 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4, p. 34.
[10] "Appendix A Calculation Details for CalEEMod." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 15.
[11] "Appendix A Calculation Details for CalEEMod." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 14.
[12] "Appendix A Calculation Details for CalEEMod." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 21.
[13] "Appendix D Default Data Tables." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/05_appendix-d2016-3-2.pdf?sfvrsn=4, p. D-84 – D-86.

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

Practical Application of a Local Hire Requirement and Associated Impact

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

Local Hire Provision Net Change	
Without Local Hire Provision	
Total Construction GHG Emissions (MT CO_2e)	3,623
Amortized Construction GHG Emissions (MT CO_2e/year)	120.77
With Local Hire Provision	
Total Construction GHG Emissions (MT CO2e)	3,024
Amortized Construction GHG Emissions (MT CO_2e/year)	100.80
% Decrease in Construction-related GHG Emissions	***17%***

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

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

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

Disclaimer

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

Sincerely,

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

Paul E. Rosenfeld, Ph.D.

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

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

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

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

Village South Specific Plan (Proposed)

Los Angeles-South Coast County, Annual

1.0 Project Characteristics

1.1 Land Usage

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

1.2 Other Project Characteristics

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

1.3 User Entered Comments & Non-Default Data

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

Project Characteristics - Consistent with the DEIR's model.

Land Use - See SWAPE comment regarding residential and retail land uses.

Construction Phase - See SWAPE comment regarding individual construction phase lengths.

Demolition - Consistent with the DEIR's model. See SWAPE comment regarding demolition.

Vehicle Trips - Saturday trips consistent with the DEIR's model. See SWAPE comment regarding weekday and Sunday trips.

Woodstoves - Woodstoves and wood-burning fireplaces consistent with the DEIR's model. See SWAPE comment regarding gas fireplaces.

Energy Use -

Construction Off-road Equipment Mitigation - See SWAPE comment on construction-related mitigation.

Area Mitigation - See SWAPE comment regarding operational mitigation measures.

Water Mitigation - See SWAPE comment regarding operational mitigation measures.

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

tblVehicleTrips	SU_TR	5.95	3.20
tblVehicleTrips	SU_TR	72.16	57.65
tblVehicleTrips	SU_TR	25.24	6.39
tblVehicleTrips	WD_TR	6.59	5.83
tblVehicleTrips	WD_TR	6.65	4.13
tblVehicleTrips	WD_TR	11.03	6.41
tblVehicleTrips	WD_TR	127.15	65.80
tblVehicleTrips	WD_TR	8.17	3.84
tblVehicleTrips	WD_TR	89.95	62.64
tblVehicleTrips	WD_TR	42.70	9.43
tblWoodstoves	NumberCatalytic	1.25	0.00
tblWoodstoves	NumberCatalytic	48.75	0.00
tblWoodstoves	NumberNoncatalytic	1.25	0.00
tblWoodstoves	NumberNoncatalytic	48.75	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00

2.0 Emissions Summary

2.1 Overall Construction

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2021	0.1713	1.8242	1.1662	2.4000e-003	0.4169	0.0817	0.4986	0.1795	0.0754	0.2549	0.0000	213.1969	213.1969	0.0601	0.0000	214.6993
2022	0.6904	4.1142	6.1625	0.0189	1.3058	0.1201	1.4259	0.3460	0.1128	0.4588	0.0000	1,721.6826	1,721.6826	0.1294	0.0000	1,724.9187
2023	0.6148	3.3649	5.6747	0.0178	1.1963	0.0996	1.2959	0.3203	0.0935	0.4138	0.0000	1,627.5295	1,627.5295	0.1185	0.0000	1,630.4925
2024	4.1619	0.1335	0.2810	5.9000e-004	0.0325	6.4700e-003	0.0390	8.6300e-003	6.0400e-003	0.0147	0.0000	52.9078	52.9078	8.0200e-003	0.0000	53.1082
Maximum	**4.1619**	**4.1142**	**6.1625**	**0.0189**	**1.3058**	**0.1201**	**1.4259**	**0.3460**	**0.1128**	**0.4588**	**0.0000**	**1,721.6826**	**1,721.6826**	**0.1294**	**0.0000**	**1,724.9187**

2.1 Overall Construction

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2021	0.1713	1.8242	1.1662	2.4000e-003	0.4169	0.0817	0.4986	0.1795	0.0754	0.2549	0.0000	213.1967	213.1967	0.0601	0.0000	214.6991
2022	0.6904	4.1142	6.1625	0.0189	1.3058	0.1201	1.4259	0.3460	0.1128	0.4588	0.0000	1,721.6823	1,721.6823	0.1294	0.0000	1,724.9183
2023	0.6148	3.3648	5.6747	0.0178	1.1963	0.0996	1.2959	0.3203	0.0935	0.4138	0.0000	1,627.5291	1,627.5291	0.1185	0.0000	1,630.4921
2024	4.1619	0.1335	0.2810	5.9000e-004	0.0325	6.4700e-003	0.0390	8.6300e-003	6.0400e-003	0.0147	0.0000	52.9077	52.9077	8.0200e-003	0.0000	53.1082
Maximum	**4.1619**	**4.1142**	**6.1625**	**0.0189**	**1.3058**	**0.1201**	**1.4259**	**0.3460**	**0.1128**	**0.4588**	**0.0000**	**1,721.6823**	**1,721.6823**	**0.1294**	**0.0000**	**1,724.9183**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

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

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

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	5.1437	0.2950	10.3804	1.6700e-003		0.0714	0.0714		0.0714	0.0714	0.0000	220.9670	220.9670	0.0201	3.7400e-003	222.5835
Energy	0.1398	1.2312	0.7770	7.6200e-003		0.0966	0.0966		0.0966	0.0966	0.0000	3,896.0732	3,896.0732	0.1303	0.0468	3,913.2833
Mobile	1.5857	7.9962	19.1834	0.0821	7.7979	0.0580	7.8559	2.0895	0.0539	2.1434	0.0000	7,620.4986	7,620.4986	0.3407	0.0000	7,629.0162
Waste						0.0000	0.0000		0.0000	0.0000	207.8079	0.0000	207.8079	12.2811	0.0000	514.8354
Water						0.0000	0.0000		0.0000	0.0000	29.1632	556.6420	585.8052	3.0183	0.0755	683.7567
Total	**6.8692**	**9.5223**	**30.3407**	**0.0914**	**7.7979**	**0.2260**	**8.0240**	**2.0895**	**0.2219**	**2.3114**	**236.9712**	**12,294.1807**	**12,531.1519**	**15.7904**	**0.1260**	**12,963.4751**

2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	5.1437	0.2950	10.3804	1.6700e-003		0.0714	0.0714		0.0714	0.0714	0.0000	220.9670	220.9670	0.0201	3.7400e-003	222.5835
Energy	0.1398	1.2312	0.7770	7.6200e-003		0.0966	0.0966		0.0966	0.0966	0.0000	3,896.0732	3,896.0732	0.1303	0.0468	3,913.2833
Mobile	1.5857	7.9962	19.1834	0.0821	7.7979	0.0580	7.8559	2.0895	0.0539	2.1434	0.0000	7,620.4986	7,620.4986	0.3407	0.0000	7,629.0162
Waste						0.0000	0.0000		0.0000	0.0000	207.8079	0.0000	207.8079	12.2811	0.0000	514.8354
Water						0.0000	0.0000		0.0000	0.0000	29.1632	556.6420	585.8052	3.0183	0.0755	683.7567
Total	**6.8692**	**9.5223**	**30.3407**	**0.0914**	**7.7979**	**0.2260**	**8.0240**	**2.0895**	**0.2219**	**2.3114**	**236.9712**	**12,294.1807**	**12,531.1519**	**15.7904**	**0.1260**	**12,963.4751**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

3.0 Construction Detail

Construction Phase

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

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

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 112.5

Acres of Paving: 0

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

OffRoad Equipment

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

Trips and VMT

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

3.1 Mitigation Measures Construction

3.2 Demolition - 2021

Unmitigated Construction On-Site

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

3.2 Demolition - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	1.9300e-003	0.0634	0.0148	1.8000e-004	3.9400e-003	1.9000e-004	4.1300e-003	1.0800e-003	1.8000e-004	1.2600e-003	0.0000	17.4566	17.4566	1.2100e-003	0.0000	17.4869
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	9.7000e-004	7.5000e-004	8.5100e-003	2.0000e-005	2.4700e-003	2.0000e-005	2.4900e-003	6.5000e-004	2.0000e-005	6.7000e-004	0.0000	2.2251	2.2251	7.0000e-005	0.0000	2.2267
Total	**2.9000e-003**	**0.0641**	**0.0233**	**2.0000e-004**	**6.4100e-003**	**2.1000e-004**	**6.6200e-003**	**1.7300e-003**	**2.0000e-004**	**1.9300e-003**	**0.0000**	**19.6816**	**19.6816**	**1.2800e-003**	**0.0000**	**19.7136**

Mitigated Construction On-Site

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

3.2 Demolition - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	1.9300e-003	0.0634	0.0148	1.8000e-004	3.9400e-003	1.9000e-004	4.1300e-003	1.0800e-003	1.8000e-004	1.2600e-003	0.0000	17.4566	17.4566	1.2100e-003	0.0000	17.4869
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	9.7000e-004	7.5000e-004	8.5100e-003	2.0000e-005	2.4700e-003	2.0000e-005	2.4900e-003	6.5000e-004	2.0000e-005	6.7000e-004	0.0000	2.2251	2.2251	7.0000e-005	0.0000	2.2267
Total	**2.9000e-003**	**0.0641**	**0.0233**	**2.0000e-004**	**6.4100e-003**	**2.1000e-004**	**6.6200e-003**	**1.7300e-003**	**2.0000e-004**	**1.9300e-003**	**0.0000**	**19.6816**	**19.6816**	**1.2800e-003**	**0.0000**	**19.7136**

3.3 Site Preparation - 2021

Unmitigated Construction On-Site

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

3.3 Site Preparation - 2021

Unmitigated Construction Off-Site

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

Mitigated Construction On-Site

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

3.3 Site Preparation - 2021

Mitigated Construction Off-Site

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

3.4 Grading - 2021

Unmitigated Construction On-Site

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

3.4 Grading - 2021

Unmitigated Construction Off-Site

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

Mitigated Construction On-Site

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

3.4 Grading - 2021

Mitigated Construction Off-Site

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

3.4 Grading - 2022

Unmitigated Construction On-Site

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

3.4 Grading - 2022

Unmitigated Construction Off-Site

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

Mitigated Construction On-Site

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

3.4 Grading - 2022

Mitigated Construction Off-Site

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

3.5 Building Construction - 2022

Unmitigated Construction On-Site

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

3.5 Building Construction - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0527	1.6961	0.4580	4.5500e-003	0.1140	3.1800e-003	0.1171	0.0329	3.0400e-003	0.0359	0.0000	441.9835	441.9835	0.0264	0.0000	442.6435
Worker	0.4088	0.3066	3.5305	0.0107	1.1103	8.8700e-003	1.1192	0.2949	8.1700e-003	0.3031	0.0000	966.8117	966.8117	0.0266	0.0000	967.4773
Total	**0.4616**	**2.0027**	**3.9885**	**0.0152**	**1.2243**	**0.0121**	**1.2363**	**0.3278**	**0.0112**	**0.3390**	**0.0000**	**1,408.7952**	**1,408.7952**	**0.0530**	**0.0000**	**1,410.1208**

Mitigated Construction On-Site

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

3.5 Building Construction - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0527	1.6961	0.4580	4.5500e-003	0.1140	3.1800e-003	0.1171	0.0329	3.0400e-003	0.0359	0.0000	441.9835	441.9835	0.0264	0.0000	442.6435
Worker	0.4088	0.3066	3.5305	0.0107	1.1103	8.8700e-003	1.1192	0.2949	8.1700e-003	0.3031	0.0000	966.8117	966.8117	0.0266	0.0000	967.4773
Total	**0.4616**	**2.0027**	**3.9885**	**0.0152**	**1.2243**	**0.0121**	**1.2363**	**0.3278**	**0.0112**	**0.3390**	**0.0000**	**1,408.7952**	**1,408.7952**	**0.0530**	**0.0000**	**1,410.1208**

3.5 Building Construction - 2023

Unmitigated Construction On-Site

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

3.5 Building Construction - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0382	1.2511	0.4011	4.3000e-003	0.1113	1.4600e-003	0.1127	0.0321	1.4000e-003	0.0335	0.0000	417.9930	417.9930	0.0228	0.0000	418.5624
Worker	0.3753	0.2708	3.1696	0.0101	1.0840	8.4100e-003	1.0924	0.2879	7.7400e-003	0.2957	0.0000	909.3439	909.3439	0.0234	0.0000	909.9291
Total	**0.4135**	**1.5218**	**3.5707**	**0.0144**	**1.1953**	**9.8700e-003**	**1.2051**	**0.3200**	**9.1400e-003**	**0.3292**	**0.0000**	**1,327.3369**	**1,327.3369**	**0.0462**	**0.0000**	**1,328.4916**

Mitigated Construction On-Site

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

3.5 Building Construction - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0382	1.2511	0.4011	4.3000e-003	0.1113	1.4600e-003	0.1127	0.0321	1.4000e-003	0.0335	0.0000	417.9930	417.9930	0.0228	0.0000	418.5624
Worker	0.3753	0.2708	3.1696	0.0101	1.0840	8.4100e-003	1.0924	0.2879	7.7400e-003	0.2957	0.0000	909.3439	909.3439	0.0234	0.0000	909.9291
Total	**0.4135**	**1.5218**	**3.5707**	**0.0144**	**1.1953**	**9.8700e-003**	**1.2051**	**0.3200**	**9.1400e-003**	**0.3292**	**0.0000**	**1,327.3369**	**1,327.3369**	**0.0462**	**0.0000**	**1,328.4916**

3.6 Paving - 2023

Unmitigated Construction On-Site

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

3.6 Paving - 2023

Unmitigated Construction Off-Site

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

Mitigated Construction On-Site

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

3.6 Paving - 2023

Mitigated Construction Off-Site

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

3.6 Paving - 2024

Unmitigated Construction On-Site

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

3.6 Paving - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.9000e-004	4.1000e-004	4.9200e-003	2.0000e-005	1.8100e-003	1.0000e-005	1.8200e-003	4.8000e-004	1.0000e-005	4.9000e-004	0.0000	1.4697	1.4697	4.0000e-005	0.0000	1.4706
Total	**5.9000e-004**	**4.1000e-004**	**4.9200e-003**	**2.0000e-005**	**1.8100e-003**	**1.0000e-005**	**1.8200e-003**	**4.8000e-004**	**1.0000e-005**	**4.9000e-004**	**0.0000**	**1.4697**	**1.4697**	**4.0000e-005**	**0.0000**	**1.4706**

Mitigated Construction On-Site

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

3.6 Paving - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.9000e-004	4.1000e-004	4.9200e-003	2.0000e-005	1.8100e-003	1.0000e-005	1.8200e-003	4.8000e-004	1.0000e-005	4.9000e-004	0.0000	1.4697	1.4697	4.0000e-005	0.0000	1.4706
Total	**5.9000e-004**	**4.1000e-004**	**4.9200e-003**	**2.0000e-005**	**1.8100e-003**	**1.0000e-005**	**1.8200e-003**	**4.8000e-004**	**1.0000e-005**	**4.9000e-004**	**0.0000**	**1.4697**	**1.4697**	**4.0000e-005**	**0.0000**	**1.4706**

3.7 Architectural Coating - 2024

Unmitigated Construction On-Site

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

3.7 Architectural Coating - 2024

Unmitigated Construction Off-Site

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

Mitigated Construction On-Site

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

3.7 Architectural Coating - 2024

Mitigated Construction Off-Site

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

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

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

4.2 Trip Summary Information

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

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments Low Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3
Apartments Mid Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3
General Office Building	16.60	8.40	6.90	33.00	48.00	19.00	77	19	4
High Turnover (Sit Down	16.60	8.40	6.90	8.50	72.50	19.00	37	20	43
Hotel	16.60	8.40	6.90	19.40	61.60	19.00	58	38	4
Quality Restaurant	16.60	8.40	6.90	12.00	69.00	19.00	38	18	44
Regional Shopping Center	16.60	8.40	6.90	16.30	64.70	19.00	54	35	11

4.4 Fleet Mix

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

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

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

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

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Apartments Low Rise	408494	2.2000e-003	0.0188	8.0100e-003	1.2000e-004		1.5200e-003	1.5200e-003		1.5200e-003	1.5200e-003	0.0000	21.7988	21.7988	4.2000e-004	4.0000e-004	21.9284
Apartments Mid Rise	1.30613e+007	0.0704	0.6018	0.2561	3.8400e-003		0.0487	0.0487		0.0487	0.0487	0.0000	696.9989	696.9989	0.0134	0.0128	701.1408
General Office Building	468450	2.5300e-003	0.0230	0.0193	1.4000e-004		1.7500e-003	1.7500e-003		1.7500e-003	1.7500e-003	0.0000	24.9983	24.9983	4.8000e-004	4.6000e-004	25.1468
High Turnover (Sit Down Restaurant)	8.30736e+006	0.0448	0.4072	0.3421	2.4400e-003		0.0310	0.0310		0.0310	0.0310	0.0000	443.3124	443.3124	8.5000e-003	8.1300e-003	445.9468
Hotel	1.74095e+006	9.3900e-003	0.0853	0.0717	5.1000e-004		6.4900e-003	6.4900e-003		6.4900e-003	6.4900e-003	0.0000	92.9036	92.9036	1.7800e-003	1.7000e-003	93.4557
Quality Restaurant	1.84608e+006	9.9500e-003	0.0905	0.0760	5.4000e-004		6.8800e-003	6.8800e-003		6.8800e-003	6.8800e-003	0.0000	98.5139	98.5139	1.8900e-003	1.8100e-003	99.0993
Regional Shopping Center	91840	5.0000e-004	4.5000e-003	3.7800e-003	3.0000e-005		3.4000e-004	3.4000e-004		3.4000e-004	3.4000e-004	0.0000	4.9009	4.9009	9.0000e-005	9.0000e-005	4.9301
Total		**0.1398**	**1.2312**	**0.7770**	**7.6200e-003**		**0.0966**	**0.0966**		**0.0966**	**0.0966**	**0.0000**	**1,383.4268**	**1,383.4268**	**0.0265**	**0.0254**	**1,391.6478**

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Apartments Low Rise	408494	2.2000e-003	0.0188	8.0100e-003	1.2000e-004		1.5200e-003	1.5200e-003		1.5200e-003	1.5200e-003	0.0000	21.7988	21.7988	4.2000e-004	4.0000e-004	21.9284
Apartments Mid Rise	1.30613e+007	0.0704	0.6018	0.2561	3.8400e-003		0.0487	0.0487		0.0487	0.0487	0.0000	696.9989	696.9989	0.0134	0.0128	701.1408
General Office Building	468450	2.5300e-003	0.0230	0.0193	1.4000e-004		1.7500e-003	1.7500e-003		1.7500e-003	1.7500e-003	0.0000	24.9983	24.9983	4.8000e-004	4.6000e-004	25.1468
High Turnover (Sit Down Restaurant)	8.30736e+006	0.0448	0.4072	0.3421	2.4400e-003		0.0310	0.0310		0.0310	0.0310	0.0000	443.3124	443.3124	8.5000e-003	8.1300e-003	445.9468
Hotel	1.74095e+006	9.3900e-003	0.0853	0.0717	5.1000e-004		6.4900e-003	6.4900e-003		6.4900e-003	6.4900e-003	0.0000	92.9036	92.9036	1.7800e-003	1.7000e-003	93.4557
Quality Restaurant	1.84608e+006	9.9500e-003	0.0905	0.0760	5.4000e-004		6.8800e-003	6.8800e-003		6.8800e-003	6.8800e-003	0.0000	98.5139	98.5139	1.8900e-003	1.8100e-003	99.0993
Regional Shopping Center	91840	5.0000e-004	4.5000e-003	3.7800e-003	3.0000e-005		3.4000e-004	3.4000e-004		3.4000e-004	3.4000e-004	0.0000	4.9009	4.9009	9.0000e-005	9.0000e-005	4.9301
Total		**0.1398**	**1.2312**	**0.7770**	**7.6200e-003**		**0.0966**	**0.0966**		**0.0966**	**0.0966**	**0.0000**	**1,383.4268**	**1,383.4268**	**0.0265**	**0.0254**	**1,391.6478**

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Apartments Low Rise	106010	33.7770	1.3900e-003	2.9000e-004	33.8978
Apartments Mid Rise	3.94697e+006	1,257.5879	0.0519	0.0107	1,262.0869
General Office Building	584550	186.2502	7.6900e-003	1.5900e-003	186.9165
High Turnover (Sit Down Restaurant)	1.58904e+006	506.3022	0.0209	4.3200e-003	508.1135
Hotel	550308	175.3399	7.2400e-003	1.5000e-003	175.9672
Quality Restaurant	353120	112.5116	4.6500e-003	9.6000e-004	112.9141
Regional Shopping Center	756000	240.8778	9.9400e-003	2.0600e-003	241.7395
Total		**2,512.6465**	**0.1037**	**0.0215**	**2,521.6356**

5.3 Energy by Land Use - Electricity

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Apartments Low Rise	106010	33.7770	1.3900e-003	2.9000e-004	33.8978
Apartments Mid Rise	3.94697e+006	1,257.5879	0.0519	0.0107	1,262.0869
General Office Building	584550	186.2502	7.6900e-003	1.5900e-003	186.9165
High Turnover (Sit Down Restaurant)	1.58904e+006	506.3022	0.0209	4.3200e-003	508.1135
Hotel	550308	175.3399	7.2400e-003	1.5000e-003	175.9672
Quality Restaurant	353120	112.5116	4.6500e-003	9.6000e-004	112.9141
Regional Shopping Center	756000	240.8778	9.9400e-003	2.0600e-003	241.7395
Total		**2,512.6465**	**0.1037**	**0.0215**	**2,521.6356**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	5.1437	0.2950	10.3804	1.6700e-003		0.0714	0.0714		0.0714	0.0714	0.0000	220.9670	220.9670	0.0201	3.7400e-003	222.5835
Unmitigated	5.1437	0.2950	10.3804	1.6700e-003		0.0714	0.0714		0.0714	0.0714	0.0000	220.9670	220.9670	0.0201	3.7400e-003	222.5835

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.4137					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	4.3998					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0206	0.1763	0.0750	1.1200e-003		0.0143	0.0143		0.0143	0.0143	0.0000	204.1166	204.1166	3.9100e-003	3.7400e-003	205.3295
Landscaping	0.3096	0.1187	10.3054	5.4000e-004		0.0572	0.0572		0.0572	0.0572	0.0000	16.8504	16.8504	0.0161	0.0000	17.2540
Total	**5.1437**	**0.2950**	**10.3804**	**1.6600e-003**		**0.0714**	**0.0714**		**0.0714**	**0.0714**	**0.0000**	**220.9670**	**220.9670**	**0.0201**	**3.7400e-003**	**222.5835**

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.4137					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	4.3998					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0206	0.1763	0.0750	1.1200e-003		0.0143	0.0143		0.0143	0.0143	0.0000	204.1166	204.1166	3.9100e-003	3.7400e-003	205.3295
Landscaping	0.3096	0.1187	10.3054	5.4000e-004		0.0572	0.0572		0.0572	0.0572	0.0000	16.8504	16.8504	0.0161	0.0000	17.2540
Total	**5.1437**	**0.2950**	**10.3804**	**1.6600e-003**		**0.0714**	**0.0714**		**0.0714**	**0.0714**	**0.0000**	**220.9670**	**220.9670**	**0.0201**	**3.7400e-003**	**222.5835**

7.0 Water Detail

7.1 Mitigation Measures Water

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

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

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Apartments Low Rise	1.62885 / 1.02688	10.9095	0.0535	1.3400e-003	12.6471
Apartments Mid Rise	63.5252 / 40.0485	425.4719	2.0867	0.0523	493.2363
General Office Building	7.99802 / 4.90201	53.0719	0.2627	6.5900e-003	61.6019
High Turnover (Sit Down Restaurant)	10.9272 / 0.697482	51.2702	0.3580	8.8200e-003	62.8482
Hotel	1.26834 / 0.140927	6.1633	0.0416	1.0300e-003	7.5079
Quality Restaurant	2.42827 / 0.154996	11.3934	0.0796	1.9600e-003	13.9663
Regional Shopping Center	4.14806 / 2.54236	27.5250	0.1363	3.4200e-003	31.9490
Total		**585.8052**	**3.0183**	**0.0755**	**683.7567**

7.2 Water by Land Use

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Apartments Low Rise	1.62885 / 1.02688	10.9095	0.0535	1.3400e-003	12.6471
Apartments Mid Rise	63.5252 / 40.0485	425.4719	2.0867	0.0523	493.2363
General Office Building	7.99802 / 4.90201	53.0719	0.2627	6.5900e-003	61.6019
High Turnover (Sit Down Restaurant)	10.9272 / 0.697482	51.2702	0.3580	8.8200e-003	62.8482
Hotel	1.26834 / 0.140927	6.1633	0.0416	1.0300e-003	7.5079
Quality Restaurant	2.42827 / 0.154996	11.3934	0.0796	1.9600e-003	13.9663
Regional Shopping Center	4.14806 / 2.54236	27.5250	0.1363	3.4200e-003	31.9490
Total		**585.8052**	**3.0183**	**0.0755**	**683.7567**

8.0 Waste Detail

8.1 Mitigation Measures Waste

Category/Year

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

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Apartments Low Rise	11.5	2.3344	0.1380	0.0000	5.7834
Apartments Mid Rise	448.5	91.0415	5.3804	0.0000	225.5513
General Office Building	41.85	8.4952	0.5021	0.0000	21.0464
High Turnover (Sit Down Restaurant)	428.4	86.9613	5.1393	0.0000	215.4430
Hotel	27.38	5.5579	0.3285	0.0000	13.7694
Quality Restaurant	7.3	1.4818	0.0876	0.0000	3.6712
Regional Shopping Center	58.8	11.9359	0.7054	0.0000	29.5706
Total		**207.8079**	**12.2811**	**0.0000**	**514.8354**

8.2 Waste by Land Use

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Apartments Low Rise	11.5	2.3344	0.1380	0.0000	5.7834
Apartments Mid Rise	448.5	91.0415	5.3804	0.0000	225.5513
General Office Building	41.85	8.4952	0.5021	0.0000	21.0464
High Turnover (Sit Down Restaurant)	428.4	86.9613	5.1393	0.0000	215.4430
Hotel	27.38	5.5579	0.3285	0.0000	13.7694
Quality Restaurant	7.3	1.4818	0.0876	0.0000	3.6712
Regional Shopping Center	58.8	11.9359	0.7054	0.0000	29.5706
Total		**207.8079**	**12.2811**	**0.0000**	**514.8354**

9.0 Operational Offroad

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

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

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

Boilers

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

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

Village South Specific Plan (Proposed)

Los Angeles-South Coast County, Summer

1.0 Project Characteristics

1.1 Land Usage

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

1.2 Other Project Characteristics

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

1.3 User Entered Comments & Non-Default Data

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

Project Characteristics - Consistent with the DEIR's model.

Land Use - See SWAPE comment regarding residential and retail land uses.

Construction Phase - See SWAPE comment regarding individual construction phase lengths.

Demolition - Consistent with the DEIR's model. See SWAPE comment regarding demolition.

Vehicle Trips - Saturday trips consistent with the DEIR's model. See SWAPE comment regarding weekday and Sunday trips.

Woodstoves - Woodstoves and wood-burning fireplaces consistent with the DEIR's model. See SWAPE comment regarding gas fireplaces.

Energy Use -

Construction Off-road Equipment Mitigation - See SWAPE comment on construction-related mitigation.

Area Mitigation - See SWAPE comment regarding operational mitigation measures.

Water Mitigation - See SWAPE comment regarding operational mitigation measures.

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

tblVehicleTrips	SU_TR	5.95	3.20
tblVehicleTrips	SU_TR	72.16	57.65
tblVehicleTrips	SU_TR	25.24	6.39
tblVehicleTrips	WD_TR	6.59	5.83
tblVehicleTrips	WD_TR	6.65	4.13
tblVehicleTrips	WD_TR	11.03	6.41
tblVehicleTrips	WD_TR	127.15	65.80
tblVehicleTrips	WD_TR	8.17	3.84
tblVehicleTrips	WD_TR	89.95	62.64
tblVehicleTrips	WD_TR	42.70	9.43
tblWoodstoves	NumberCatalytic	1.25	0.00
tblWoodstoves	NumberCatalytic	48.75	0.00
tblWoodstoves	NumberNoncatalytic	1.25	0.00
tblWoodstoves	NumberNoncatalytic	48.75	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00

2.0 Emissions Summary

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	4.2769	46.4588	31.6840	0.0643	18.2675	2.0461	20.3135	9.9840	1.8824	11.8664	0.0000	6,234.7974	6,234.7974	1.9495	0.0000	6,283.5352
2022	5.3304	38.8967	49.5629	0.1517	9.8688	1.6366	10.7727	3.6558	1.5057	5.1615	0.0000	15,251.5674	15,251.5674	1.9503	0.0000	15,278.5288
2023	4.8957	26.3317	46.7567	0.1472	9.8688	0.7794	10.6482	2.6381	0.7322	3.3702	0.0000	14,807.5269	14,807.5269	1.0250	0.0000	14,833.1521
2024	237.1630	9.5575	15.1043	0.0244	1.7884	0.4698	1.8628	0.4743	0.4322	0.5476	0.0000	2,361.3989	2,361.3989	0.7177	0.0000	2,379.3421
Maximum	**237.1630**	**46.4588**	**49.5629**	**0.1517**	**18.2675**	**2.0461**	**20.3135**	**9.9840**	**1.8824**	**11.8664**	**0.0000**	**15,251.5674**	**15,251.5674**	**1.9503**	**0.0000**	**15,278.5288**

2.1 Overall Construction (Maximum Daily Emission)

Mitigated Construction

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	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**

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192
Energy	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387
Mobile	9.8489	45.4304	114.8495	0.4917	45.9592	0.3360	46.2951	12.2950	0.3119	12.6070		50,306.6034	50,306.6034	2.1807		50,361.1208
Total	**41.1168**	**67.2262**	**207.5497**	**0.6278**	**45.9592**	**2.4626**	**48.4217**	**12.2950**	**2.4385**	**14.7336**	**0.0000**	**76,811.1816**	**76,811.1816**	**2.8282**	**0.4832**	**77,025.8786**

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192
Energy	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387
Mobile	9.8489	45.4304	114.8495	0.4917	45.9592	0.3360	46.2951	12.2950	0.3119	12.6070		50,306.6034	50,306.6034	2.1807		50,361.1208
Total	**41.1168**	**67.2262**	**207.5497**	**0.6278**	**45.9592**	**2.4626**	**48.4217**	**12.2950**	**2.4385**	**14.7336**	**0.0000**	**76,811.1816**	**76,811.1816**	**2.8282**	**0.4832**	**77,025.8786**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

3.0 Construction Detail

Construction Phase

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

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 112.5

Acres of Paving: 0

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

OffRoad Equipment

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

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

Trips and VMT

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

3.1 Mitigation Measures Construction

3.2 Demolition - 2021

Unmitigated Construction On-Site

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

3.2 Demolition - 2021

Unmitigated Construction Off-Site

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

Mitigated Construction On-Site

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

3.2 Demolition - 2021

Mitigated Construction Off-Site

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

3.3 Site Preparation - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307			0.0000			0.0000
Off-Road	3.8882	40.4971	21.1543	0.0380		2.0445	2.0445		1.8809	1.8809		3,685.6569	3,685.6569	1.1920		3,715.4573
Total	**3.8882**	**40.4971**	**21.1543**	**0.0380**	**18.0663**	**2.0445**	**20.1107**	**9.9307**	**1.8809**	**11.8116**		**3,685.6569**	**3,685.6569**	**1.1920**		**3,715.4573**

3.3 Site Preparation - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0772	0.0530	0.7250	2.0600e-003	0.2012	1.6300e-003	0.2028	0.0534	1.5000e-003	0.0549		204.9786	204.9786	6.0400e-003		205.1296
Total	**0.0772**	**0.0530**	**0.7250**	**2.0600e-003**	**0.2012**	**1.6300e-003**	**0.2028**	**0.0534**	**1.5000e-003**	**0.0549**		**204.9786**	**204.9786**	**6.0400e-003**		**205.1296**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307			0.0000			0.0000
Off-Road	3.8882	40.4971	21.1543	0.0380		2.0445	2.0445		1.8809	1.8809	0.0000	3,685.6569	3,685.6569	1.1920		3,715.4573
Total	**3.8882**	**40.4971**	**21.1543**	**0.0380**	**18.0663**	**2.0445**	**20.1107**	**9.9307**	**1.8809**	**11.8116**	**0.0000**	**3,685.6569**	**3,685.6569**	**1.1920**		**3,715.4573**

3.3 Site Preparation - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0772	0.0530	0.7250	2.0600e-003	0.2012	1.6300e-003	0.2028	0.0534	1.5000e-003	0.0549		204.9786	204.9786	6.0400e-003		205.1296
Total	**0.0772**	**0.0530**	**0.7250**	**2.0600e-003**	**0.2012**	**1.6300e-003**	**0.2028**	**0.0534**	**1.5000e-003**	**0.0549**		**204.9786**	**204.9786**	**6.0400e-003**		**205.1296**

3.4 Grading - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	4.1912	46.3998	30.8785	0.0620		1.9853	1.9853		1.8265	1.8265		6,007.0434	6,007.0434	1.9428		6,055.6134
Total	**4.1912**	**46.3998**	**30.8785**	**0.0620**	**8.6733**	**1.9853**	**10.6587**	**3.5965**	**1.8265**	**5.4230**		**6,007.0434**	**6,007.0434**	**1.9428**		**6,055.6134**

3.4 Grading - 2021

Unmitigated Construction Off-Site

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

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	4.1912	46.3998	30.8785	0.0620		1.9853	1.9853		1.8265	1.8265	0.0000	6,007.0434	6,007.0434	1.9428		6,055.6134
Total	**4.1912**	**46.3998**	**30.8785**	**0.0620**	**8.6733**	**1.9853**	**10.6587**	**3.5965**	**1.8265**	**5.4230**	**0.0000**	**6,007.0434**	**6,007.0434**	**1.9428**		**6,055.6134**

3.4 Grading - 2021

Mitigated Construction Off-Site

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

3.4 Grading - 2022

Unmitigated Construction On-Site

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

3.4 Grading - 2022

Unmitigated Construction Off-Site

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

Mitigated Construction On-Site

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

3.4 Grading - 2022

Mitigated Construction Off-Site

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

3.5 Building Construction - 2022

Unmitigated Construction On-Site

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

3.5 Building Construction - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.4079	13.2032	3.4341	0.0364	0.9155	0.0248	0.9404	0.2636	0.0237	0.2873		3,896.5482	3,896.5482	0.2236		3,902.1384
Worker	3.2162	2.1318	29.7654	0.0883	8.9533	0.0701	9.0234	2.3745	0.0646	2.4390		8,800.6857	8,800.6857	0.2429		8,806.7582
Total	**3.6242**	**15.3350**	**33.1995**	**0.1247**	**9.8688**	**0.0949**	**9.9637**	**2.6381**	**0.0883**	**2.7263**		**12,697.2339**	**12,697.2339**	**0.4665**		**12,708.8966**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.7062	15.6156	16.3634	0.0269		0.8090	0.8090		0.7612	0.7612	0.0000	2,554.3336	2,554.3336	0.6120		2,569.6322
Total	**1.7062**	**15.6156**	**16.3634**	**0.0269**		**0.8090**	**0.8090**		**0.7612**	**0.7612**	**0.0000**	**2,554.3336**	**2,554.3336**	**0.6120**		**2,569.6322**

3.5 Building Construction - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.4079	13.2032	3.4341	0.0364	0.9155	0.0248	0.9404	0.2636	0.0237	0.2873		3,896.5482	3,896.5482	0.2236		3,902.1384
Worker	3.2162	2.1318	29.7654	0.0883	8.9533	0.0701	9.0234	2.3745	0.0646	2.4390		8,800.6857	8,800.6857	0.2429		8,806.7582
Total	**3.6242**	**15.3350**	**33.1995**	**0.1247**	**9.8688**	**0.0949**	**9.9637**	**2.6381**	**0.0883**	**2.7263**		**12,697.2339**	**12,697.2339**	**0.4665**		**12,708.8966**

3.5 Building Construction - 2023

Unmitigated Construction On-Site

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

3.5 Building Construction - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.3027	10.0181	3.1014	0.0352	0.9156	0.0116	0.9271	0.2636	0.0111	0.2747		3,773.8762	3,773.8762	0.1982		3,778.8300
Worker	3.0203	1.9287	27.4113	0.0851	8.9533	0.0681	9.0214	2.3745	0.0627	2.4372		8,478.4408	8,478.4408	0.2190		8,483.9160
Total	**3.3229**	**11.9468**	**30.5127**	**0.1203**	**9.8688**	**0.0797**	**9.9485**	**2.6381**	**0.0738**	**2.7118**		**12,252.3170**	**12,252.3170**	**0.4172**		**12,262.7460**

Mitigated Construction On-Site

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

3.5 Building Construction - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.3027	10.0181	3.1014	0.0352	0.9156	0.0116	0.9271	0.2636	0.0111	0.2747		3,773.8762	3,773.8762	0.1982		3,778.8300
Worker	3.0203	1.9287	27.4113	0.0851	8.9533	0.0681	9.0214	2.3745	0.0627	2.4372		8,478.4408	8,478.4408	0.2190		8,483.9160
Total	**3.3229**	**11.9468**	**30.5127**	**0.1203**	**9.8688**	**0.0797**	**9.9485**	**2.6381**	**0.0738**	**2.7118**		**12,252.3170**	**12,252.3170**	**0.4172**		**12,262.7460**

3.6 Paving - 2023

Unmitigated Construction On-Site

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

3.6 Paving - 2023

Unmitigated Construction Off-Site

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

Mitigated Construction On-Site

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

3.6 Paving - 2023

Mitigated Construction Off-Site

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

3.6 Paving - 2024

Unmitigated Construction On-Site

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

3.6 Paving - 2024

Unmitigated Construction Off-Site

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

Mitigated Construction On-Site

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

3.6 Paving - 2024

Mitigated Construction Off-Site

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

3.7 Architectural Coating - 2024

Unmitigated Construction On-Site

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

3.7 Architectural Coating - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.5707	0.3513	5.1044	0.0165	1.7884	0.0134	1.8018	0.4743	0.0123	0.4866		1,641.0852	1,641.0852	0.0401		1,642.0886
Total	**0.5707**	**0.3513**	**5.1044**	**0.0165**	**1.7884**	**0.0134**	**1.8018**	**0.4743**	**0.0123**	**0.4866**		**1,641.0852**	**1,641.0852**	**0.0401**		**1,642.0886**

Mitigated Construction On-Site

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

3.7 Architectural Coating - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.5707	0.3513	5.1044	0.0165	1.7884	0.0134	1.8018	0.4743	0.0123	0.4866		1,641.0852	1,641.0852	0.0401		1,642.0886
Total	**0.5707**	**0.3513**	**5.1044**	**0.0165**	**1.7884**	**0.0134**	**1.8018**	**0.4743**	**0.0123**	**0.4866**		**1,641.0852**	**1,641.0852**	**0.0401**		**1,642.0886**

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	9.8489	45.4304	114.8495	0.4917	45.9592	0.3360	46.2951	12.2950	0.3119	12.6070		50,306.6034	50,306.6034	2.1807		50,361.1208
Unmitigated	9.8489	45.4304	114.8495	0.4917	45.9592	0.3360	46.2951	12.2950	0.3119	12.6070		50,306.6034	50,306.6034	2.1807		50,361.1208

4.2 Trip Summary Information

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

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments Low Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3
Apartments Mid Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3
General Office Building	16.60	8.40	6.90	33.00	48.00	19.00	77	19	4
High Turnover (Sit Down	16.60	8.40	6.90	8.50	72.50	19.00	37	20	43
Hotel	16.60	8.40	6.90	19.40	61.60	19.00	58	38	4
Quality Restaurant	16.60	8.40	6.90	12.00	69.00	19.00	38	18	44
Regional Shopping Center	16.60	8.40	6.90	16.30	64.70	19.00	54	35	11

4.4 Fleet Mix

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

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387
NaturalGas Unmitigated	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Apartments Low Rise	1119.16	0.0121	0.1031	0.0439	6.6000e-004		8.3400e-003	8.3400e-003		8.3400e-003	8.3400e-003		131.6662	131.6662	2.5200e-003	2.4100e-003	132.4486
Apartments Mid Rise	35784.3	0.3859	3.2978	1.4033	0.0211		0.2666	0.2666		0.2666	0.2666		4,209.9164	4,209.9164	0.0807	0.0772	4,234.9339
General Office Building	1283.42	0.0138	0.1258	0.1057	7.5000e-004		9.5600e-003	9.5600e-003		9.5600e-003	9.5600e-003		150.9911	150.9911	2.8900e-003	2.7700e-003	151.8884
High Turnover (Sit Down Restaurant)	22759.9	0.2455	2.2314	1.8743	0.0134		0.1696	0.1696		0.1696	0.1696		2,677.6342	2,677.6342	0.0513	0.0491	2,693.5460
Hotel	4769.72	0.0514	0.4676	0.3928	2.8100e-003		0.0355	0.0355		0.0355	0.0355		561.1436	561.1436	0.0108	0.0103	564.4782
Quality Restaurant	5057.75	0.0545	0.4959	0.4165	2.9800e-003		0.0377	0.0377		0.0377	0.0377		595.0298	595.0298	0.0114	0.0109	598.5658
Regional Shopping Center	251.616	2.7100e-003	0.0247	0.0207	1.5000e-004		1.8700e-003	1.8700e-003		1.8700e-003	1.8700e-003		29.6019	29.6019	5.7000e-004	5.4000e-004	29.7778
Total		**0.7660**	**6.7463**	**4.2573**	**0.0418**		**0.5292**	**0.5292**		**0.5292**	**0.5292**		**8,355.9832**	**8,355.9832**	**0.1602**	**0.1532**	**8,405.6387**

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Apartments Low Rise	1.11916	0.0121	0.1031	0.0439	6.6000e-004		8.3400e-003	8.3400e-003		8.3400e-003	8.3400e-003		131.6662	131.6662	2.5200e-003	2.4100e-003	132.4486
Apartments Mid Rise	35.7843	0.3859	3.2978	1.4033	0.0211		0.2666	0.2666		0.2666	0.2666		4,209.9164	4,209.9164	0.0807	0.0772	4,234.9339
General Office Building	1.28342	0.0138	0.1258	0.1057	7.5000e-004		9.5600e-003	9.5600e-003		9.5600e-003	9.5600e-003		150.9911	150.9911	2.8900e-003	2.7700e-003	151.8884
High Turnover (Sit Down Restaurant)	22.7599	0.2455	2.2314	1.8743	0.0134		0.1696	0.1696		0.1696	0.1696		2,677.6342	2,677.6342	0.0513	0.0491	2,693.5460
Hotel	4.76972	0.0514	0.4676	0.3928	2.8100e-003		0.0355	0.0355		0.0355	0.0355		561.1436	561.1436	0.0108	0.0103	564.4782
Quality Restaurant	5.05775	0.0545	0.4959	0.4165	2.9800e-003		0.0377	0.0377		0.0377	0.0377		595.0298	595.0298	0.0114	0.0109	598.5658
Regional Shopping Center	0.251616	2.7100e-003	0.0247	0.0207	1.5000e-004		1.8700e-003	1.8700e-003		1.8700e-003	1.8700e-003		29.6019	29.6019	5.7000e-004	5.4000e-004	29.7778
Total		**0.7660**	**6.7463**	**4.2573**	**0.0418**		**0.5292**	**0.5292**		**0.5292**	**0.5292**		**8,355.9832**	**8,355.9832**	**0.1602**	**0.1532**	**8,405.6387**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192
Unmitigated	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	2.2670					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	24.1085					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	1.6500	14.1000	6.0000	0.0900		1.1400	1.1400		1.1400	1.1400	0.0000	18,000.0000	18,000.0000	0.3450	0.3300	18,106.9650
Landscaping	2.4766	0.9496	82.4430	4.3600e-003		0.4574	0.4574		0.4574	0.4574		148.5950	148.5950	0.1424		152.1542
Total	**30.5020**	**15.0496**	**88.4430**	**0.0944**		**1.5974**	**1.5974**		**1.5974**	**1.5974**	**0.0000**	**18,148.5950**	**18,148.5950**	**0.4874**	**0.3300**	**18,259.1192**

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	2.2670					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	24.1085					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	1.6500	14.1000	6.0000	0.0900		1.1400	1.1400		1.1400	1.1400	0.0000	18,000.0000	18,000.0000	0.3450	0.3300	18,106.9650
Landscaping	2.4766	0.9496	82.4430	4.3600e-003		0.4574	0.4574		0.4574	0.4574		148.5950	148.5950	0.1424		152.1542
Total	**30.5020**	**15.0496**	**88.4430**	**0.0944**		**1.5974**	**1.5974**		**1.5974**	**1.5974**	**0.0000**	**18,148.5950**	**18,148.5950**	**0.4874**	**0.3300**	**18,259.1192**

7.0 Water Detail

7.1 Mitigation Measures Water

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

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

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

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

Boilers

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

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

Village South Specific Plan (Proposed)

Los Angeles-South Coast County, Winter

1.0 Project Characteristics

1.1 Land Usage

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

1.2 Other Project Characteristics

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

1.3 User Entered Comments & Non-Default Data

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

Project Characteristics - Consistent with the DEIR's model.

Land Use - See SWAPE comment regarding residential and retail land uses.

Construction Phase - See SWAPE comment regarding individual construction phase lengths.

Demolition - Consistent with the DEIR's model. See SWAPE comment regarding demolition.

Vehicle Trips - Saturday trips consistent with the DEIR's model. See SWAPE comment regarding weekday and Sunday trips.

Woodstoves - Woodstoves and wood-burning fireplaces consistent with the DEIR's model. See SWAPE comment regarding gas fireplaces.

Energy Use -

Construction Off-road Equipment Mitigation - See SWAPE comment on construction-related mitigation.

Area Mitigation - See SWAPE comment regarding operational mitigation measures.

Water Mitigation - See SWAPE comment regarding operational mitigation measures.

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

tblVehicleTrips	SU_TR	5.95	3.20
tblVehicleTrips	SU_TR	72.16	57.65
tblVehicleTrips	SU_TR	25.24	6.39
tblVehicleTrips	WD_TR	6.59	5.83
tblVehicleTrips	WD_TR	6.65	4.13
tblVehicleTrips	WD_TR	11.03	6.41
tblVehicleTrips	WD_TR	127.15	65.80
tblVehicleTrips	WD_TR	8.17	3.84
tblVehicleTrips	WD_TR	89.95	62.64
tblVehicleTrips	WD_TR	42.70	9.43
tblWoodstoves	NumberCatalytic	1.25	0.00
tblWoodstoves	NumberCatalytic	48.75	0.00
tblWoodstoves	NumberNoncatalytic	1.25	0.00
tblWoodstoves	NumberNoncatalytic	48.75	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00

2.0 Emissions Summary

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	4.2865	46.4651	31.6150	0.0642	18.2675	2.0461	20.3135	9.9840	1.8824	11.8664	0.0000	6,221.4937	6,221.4937	1.9491	0.0000	6,270.2214
2022	5.7218	38.9024	47.3319	0.1455	9.8688	1.6366	10.7736	3.6558	1.5057	5.1615	0.0000	14,630.3099	14,630.3099	1.9499	0.0000	14,657.2663
2023	5.2705	26.4914	44.5936	0.1413	9.8688	0.7800	10.6488	2.6381	0.7328	3.3708	0.0000	14,210.3424	14,210.3424	1.0230	0.0000	14,235.9160
2024	237.2328	9.5610	15.0611	0.0243	1.7884	0.4698	1.8628	0.4743	0.4322	0.5476	0.0000	2,352.4178	2,352.4178	0.7175	0.0000	2,370.3550
Maximum	**237.2328**	**46.4651**	**47.3319**	**0.1455**	**18.2675**	**2.0461**	**20.3135**	**9.9840**	**1.8824**	**11.8664**	**0.0000**	**14,630.3099**	**14,630.3099**	**1.9499**	**0.0000**	**14,657.2663**

2.1 Overall Construction (Maximum Daily Emission)

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	4.2865	46.4651	31.6150	0.0642	18.2675	2.0461	20.3135	9.9840	1.8824	11.8664	0.0000	6,221.4937	6,221.4937	1.9491	0.0000	6,270.2214
2022	5.7218	38.9024	47.3319	0.1455	9.8688	1.6366	10.7736	3.6558	1.5057	5.1615	0.0000	14,630.3099	14,630.3099	1.9499	0.0000	14,657.2663
2023	5.2705	26.4914	44.5936	0.1413	9.8688	0.7800	10.6488	2.6381	0.7328	3.3708	0.0000	14,210.3424	14,210.3424	1.0230	0.0000	14,235.9160
2024	237.2328	9.5610	15.0611	0.0243	1.7884	0.4698	1.8628	0.4743	0.4322	0.5476	0.0000	2,352.4178	2,352.4178	0.7175	0.0000	2,370.3550
Maximum	**237.2328**	**46.4651**	**47.3319**	**0.1455**	**18.2675**	**2.0461**	**20.3135**	**9.9840**	**1.8824**	**11.8664**	**0.0000**	**14,630.3099**	**14,630.3099**	**1.9499**	**0.0000**	**14,657.2663**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	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**

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192
Energy	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387
Mobile	9.5233	45.9914	110.0422	0.4681	45.9592	0.3373	46.2965	12.2950	0.3132	12.6083		47,917.8005	47,917.8005	2.1953		47,972.6839
Total	**40.7912**	**67.7872**	**202.7424**	**0.6043**	**45.9592**	**2.4640**	**48.4231**	**12.2950**	**2.4399**	**14.7349**	**0.0000**	**74,422.3787**	**74,422.3787**	**2.8429**	**0.4832**	**74,637.4417**

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192
Energy	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387
Mobile	9.5233	45.9914	110.0422	0.4681	45.9592	0.3373	46.2965	12.2950	0.3132	12.6083		47,917.8005	47,917.8005	2.1953		47,972.6839
Total	**40.7912**	**67.7872**	**202.7424**	**0.6043**	**45.9592**	**2.4640**	**48.4231**	**12.2950**	**2.4399**	**14.7349**	**0.0000**	**74,422.3787**	**74,422.3787**	**2.8429**	**0.4832**	**74,637.4417**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

3.0 Construction Detail

Construction Phase

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

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 112.5

Acres of Paving: 0

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

OffRoad Equipment

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

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

Trips and VMT

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

3.1 Mitigation Measures Construction

3.2 Demolition - 2021

Unmitigated Construction On-Site

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

3.2 Demolition - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.1304	4.1454	1.0182	0.0117	0.2669	0.0128	0.2797	0.0732	0.0122	0.0854		1,269.8555	1,269.8555	0.0908		1,272.1252
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0715	0.0489	0.5524	1.6100e-003	0.1677	1.3500e-003	0.1690	0.0445	1.2500e-003	0.0457		160.8377	160.8377	4.7300e-003		160.9560
Total	**0.2019**	**4.1943**	**1.5706**	**0.0133**	**0.4346**	**0.0141**	**0.4487**	**0.1176**	**0.0135**	**0.1311**		**1,430.6932**	**1,430.6932**	**0.0955**		**1,433.0812**

Mitigated Construction On-Site

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

3.2 Demolition - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.1304	4.1454	1.0182	0.0117	0.2669	0.0128	0.2797	0.0732	0.0122	0.0854		1,269.8555	1,269.8555	0.0908		1,272.1252
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0715	0.0489	0.5524	1.6100e-003	0.1677	1.3500e-003	0.1690	0.0445	1.2500e-003	0.0457		160.8377	160.8377	4.7300e-003		160.9560
Total	**0.2019**	**4.1943**	**1.5706**	**0.0133**	**0.4346**	**0.0141**	**0.4487**	**0.1176**	**0.0135**	**0.1311**		**1,430.6932**	**1,430.6932**	**0.0955**		**1,433.0812**

3.3 Site Preparation - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307			0.0000			0.0000
Off-Road	3.8882	40.4971	21.1543	0.0380		2.0445	2.0445		1.8809	1.8809		3,685.6569	3,685.6569	1.1920		3,715.4573
Total	**3.8882**	**40.4971**	**21.1543**	**0.0380**	**18.0663**	**2.0445**	**20.1107**	**9.9307**	**1.8809**	**11.8116**		**3,685.6569**	**3,685.6569**	**1.1920**		**3,715.4573**

3.3 Site Preparation - 2021

Unmitigated Construction Off-Site

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

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307			0.0000			0.0000
Off-Road	3.8882	40.4971	21.1543	0.0380		2.0445	2.0445		1.8809	1.8809	0.0000	3,685.6569	3,685.6569	1.1920		3,715.4573
Total	**3.8882**	**40.4971**	**21.1543**	**0.0380**	**18.0663**	**2.0445**	**20.1107**	**9.9307**	**1.8809**	**11.8116**	**0.0000**	**3,685.6569**	**3,685.6569**	**1.1920**		**3,715.4573**

3.3 Site Preparation - 2021

Mitigated Construction Off-Site

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

3.4 Grading - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	4.1912	46.3998	30.8785	0.0620		1.9853	1.9853		1.8265	1.8265		6,007.0434	6,007.0434	1.9428		6,055.6134
Total	**4.1912**	**46.3998**	**30.8785**	**0.0620**	**8.6733**	**1.9853**	**10.6587**	**3.5965**	**1.8265**	**5.4230**		**6,007.0434**	**6,007.0434**	**1.9428**		**6,055.6134**

3.4 Grading - 2021

Unmitigated Construction Off-Site

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

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	4.1912	46.3998	30.8785	0.0620		1.9853	1.9853		1.8265	1.8265	0.0000	6,007.0434	6,007.0434	1.9428		6,055.6134
Total	**4.1912**	**46.3998**	**30.8785**	**0.0620**	**8.6733**	**1.9853**	**10.6587**	**3.5965**	**1.8265**	**5.4230**	**0.0000**	**6,007.0434**	**6,007.0434**	**1.9428**		**6,055.6134**

3.4 Grading - 2021

Mitigated Construction Off-Site

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

3.4 Grading - 2022

Unmitigated Construction On-Site

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

3.4 Grading - 2022

Unmitigated Construction Off-Site

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

Mitigated Construction On-Site

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

3.4 Grading - 2022

Mitigated Construction Off-Site

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

3.5 Building Construction - 2022

Unmitigated Construction On-Site

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

3.5 Building Construction - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.4284	13.1673	3.8005	0.0354	0.9155	0.0256	0.9412	0.2636	0.0245	0.2881		3,789.0750	3,789.0750	0.2381		3,795.0283
Worker	3.5872	2.3593	27.1680	0.0832	8.9533	0.0701	9.0234	2.3745	0.0646	2.4390		8,286.9013	8,286.9013	0.2282		8,292.6058
Total	**4.0156**	**15.5266**	**30.9685**	**0.1186**	**9.8688**	**0.0957**	**9.9645**	**2.6381**	**0.0891**	**2.7271**		**12,075.9763**	**12,075.9763**	**0.4663**		**12,087.6341**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.7062	15.6156	16.3634	0.0269		0.8090	0.8090		0.7612	0.7612	0.0000	2,554.3336	2,554.3336	0.6120		2,569.6322
Total	**1.7062**	**15.6156**	**16.3634**	**0.0269**		**0.8090**	**0.8090**		**0.7612**	**0.7612**	**0.0000**	**2,554.3336**	**2,554.3336**	**0.6120**		**2,569.6322**

3.5 Building Construction - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.4284	13.1673	3.8005	0.0354	0.9155	0.0256	0.9412	0.2636	0.0245	0.2881		3,789.0750	3,789.0750	0.2381		3,795.0283
Worker	3.5872	2.3593	27.1680	0.0832	8.9533	0.0701	9.0234	2.3745	0.0646	2.4390		8,286.9013	8,286.9013	0.2282		8,292.6058
Total	**4.0156**	**15.5266**	**30.9685**	**0.1186**	**9.8688**	**0.0957**	**9.9645**	**2.6381**	**0.0891**	**2.7271**		**12,075.9763**	**12,075.9763**	**0.4663**		**12,087.6341**

3.5 Building Construction - 2023

Unmitigated Construction On-Site

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

3.5 Building Construction - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.3183	9.9726	3.3771	0.0343	0.9156	0.0122	0.9277	0.2636	0.0116	0.2752		3,671.4007	3,671.4007	0.2096		3,676.6417
Worker	3.3795	2.1338	24.9725	0.0801	8.9533	0.0681	9.0214	2.3745	0.0627	2.4372		7,983.7318	7,983.7318	0.2055		7,988.8683
Total	**3.6978**	**12.1065**	**28.3496**	**0.1144**	**9.8688**	**0.0803**	**9.9491**	**2.6381**	**0.0743**	**2.7124**		**11,655.1325**	**11,655.1325**	**0.4151**		**11,665.5099**

Mitigated Construction On-Site

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

3.5 Building Construction - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.3183	9.9726	3.3771	0.0343	0.9156	0.0122	0.9277	0.2636	0.0116	0.2752		3,671.4007	3,671.4007	0.2096		3,676.6417
Worker	3.3795	2.1338	24.9725	0.0801	8.9533	0.0681	9.0214	2.3745	0.0627	2.4372		7,983.7318	7,983.7318	0.2055		7,988.8683
Total	**3.6978**	**12.1065**	**28.3496**	**0.1144**	**9.8688**	**0.0803**	**9.9491**	**2.6381**	**0.0743**	**2.7124**		**11,655.1325**	**11,655.1325**	**0.4151**		**11,665.5099**

3.6 Paving - 2023

Unmitigated Construction On-Site

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

3.6 Paving - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0633	0.0400	0.4677	1.5000e-003	0.1677	1.2800e-003	0.1689	0.0445	1.1700e-003	0.0456		149.5081	149.5081	3.8500e-003		149.6043
Total	**0.0633**	**0.0400**	**0.4677**	**1.5000e-003**	**0.1677**	**1.2800e-003**	**0.1689**	**0.0445**	**1.1700e-003**	**0.0456**		**149.5081**	**149.5081**	**3.8500e-003**		**149.6043**

Mitigated Construction On-Site

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

3.6 Paving - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0633	0.0400	0.4677	1.5000e-003	0.1677	1.2800e-003	0.1689	0.0445	1.1700e-003	0.0456		149.5081	149.5081	3.8500e-003		149.6043
Total	**0.0633**	**0.0400**	**0.4677**	**1.5000e-003**	**0.1677**	**1.2800e-003**	**0.1689**	**0.0445**	**1.1700e-003**	**0.0456**		**149.5081**	**149.5081**	**3.8500e-003**		**149.6043**

3.6 Paving - 2024

Unmitigated Construction On-Site

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

3.6 Paving - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0601	0.0364	0.4354	1.4500e-003	0.1677	1.2600e-003	0.1689	0.0445	1.1600e-003	0.0456		144.8706	144.8706	3.5300e-003		144.9587
Total	**0.0601**	**0.0364**	**0.4354**	**1.4500e-003**	**0.1677**	**1.2600e-003**	**0.1689**	**0.0445**	**1.1600e-003**	**0.0456**		**144.8706**	**144.8706**	**3.5300e-003**		**144.9587**

Mitigated Construction On-Site

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

3.6 Paving - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0601	0.0364	0.4354	1.4500e-003	0.1677	1.2600e-003	0.1689	0.0445	1.1600e-003	0.0456		144.8706	144.8706	3.5300e-003		144.9587
Total	**0.0601**	**0.0364**	**0.4354**	**1.4500e-003**	**0.1677**	**1.2600e-003**	**0.1689**	**0.0445**	**1.1600e-003**	**0.0456**		**144.8706**	**144.8706**	**3.5300e-003**		**144.9587**

3.7 Architectural Coating - 2024

Unmitigated Construction On-Site

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

3.7 Architectural Coating - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.6406	0.3886	4.6439	0.0155	1.7884	0.0134	1.8018	0.4743	0.0123	0.4866		1,545.2860	1,545.2860	0.0376		1,546.2262
Total	**0.6406**	**0.3886**	**4.6439**	**0.0155**	**1.7884**	**0.0134**	**1.8018**	**0.4743**	**0.0123**	**0.4866**		**1,545.2860**	**1,545.2860**	**0.0376**		**1,546.2262**

Mitigated Construction On-Site

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

3.7 Architectural Coating - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.6406	0.3886	4.6439	0.0155	1.7884	0.0134	1.8018	0.4743	0.0123	0.4866		1,545.2860	1,545.2860	0.0376		1,546.2262
Total	**0.6406**	**0.3886**	**4.6439**	**0.0155**	**1.7884**	**0.0134**	**1.8018**	**0.4743**	**0.0123**	**0.4866**		**1,545.2860**	**1,545.2860**	**0.0376**		**1,546.2262**

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	9.5233	45.9914	110.0422	0.4681	45.9592	0.3373	46.2965	12.2950	0.3132	12.6083		47,917.8005	47,917.8005	2.1953		47,972.6839
Unmitigated	9.5233	45.9914	110.0422	0.4681	45.9592	0.3373	46.2965	12.2950	0.3132	12.6083		47,917.8005	47,917.8005	2.1953		47,972.6839

4.2 Trip Summary Information

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

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments Low Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3
Apartments Mid Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3
General Office Building	16.60	8.40	6.90	33.00	48.00	19.00	77	19	4
High Turnover (Sit Down	16.60	8.40	6.90	8.50	72.50	19.00	37	20	43
Hotel	16.60	8.40	6.90	19.40	61.60	19.00	58	38	4
Quality Restaurant	16.60	8.40	6.90	12.00	69.00	19.00	38	18	44
Regional Shopping Center	16.60	8.40	6.90	16.30	64.70	19.00	54	35	11

4.4 Fleet Mix

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

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387
NaturalGas Unmitigated	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Apartments Low Rise	1119.16	0.0121	0.1031	0.0439	6.6000e-004		8.3400e-003	8.3400e-003		8.3400e-003	8.3400e-003		131.6662	131.6662	2.5200e-003	2.4100e-003	132.4486
Apartments Mid Rise	35784.3	0.3859	3.2978	1.4033	0.0211		0.2666	0.2666		0.2666	0.2666		4,209.9164	4,209.9164	0.0807	0.0772	4,234.9339
General Office Building	1283.42	0.0138	0.1258	0.1057	7.5000e-004		9.5600e-003	9.5600e-003		9.5600e-003	9.5600e-003		150.9911	150.9911	2.8900e-003	2.7700e-003	151.8884
High Turnover (Sit Down Restaurant)	22759.9	0.2455	2.2314	1.8743	0.0134		0.1696	0.1696		0.1696	0.1696		2,677.6342	2,677.6342	0.0513	0.0491	2,693.5460
Hotel	4769.72	0.0514	0.4676	0.3928	2.8100e-003		0.0355	0.0355		0.0355	0.0355		561.1436	561.1436	0.0108	0.0103	564.4782
Quality Restaurant	5057.75	0.0545	0.4959	0.4165	2.9800e-003		0.0377	0.0377		0.0377	0.0377		595.0298	595.0298	0.0114	0.0109	598.5658
Regional Shopping Center	251.616	2.7100e-003	0.0247	0.0207	1.5000e-004		1.8700e-003	1.8700e-003		1.8700e-003	1.8700e-003		29.6019	29.6019	5.7000e-004	5.4000e-004	29.7778
Total		**0.7660**	**6.7463**	**4.2573**	**0.0418**		**0.5292**	**0.5292**		**0.5292**	**0.5292**		**8,355.9832**	**8,355.9832**	**0.1602**	**0.1532**	**8,405.6387**

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Apartments Low Rise	1.11916	0.0121	0.1031	0.0439	6.6000e-004		8.3400e-003	8.3400e-003		8.3400e-003	8.3400e-003		131.6662	131.6662	2.5200e-003	2.4100e-003	132.4486
Apartments Mid Rise	35.7843	0.3859	3.2978	1.4033	0.0211		0.2666	0.2666		0.2666	0.2666		4,209.9164	4,209.9164	0.0807	0.0772	4,234.9339
General Office Building	1.28342	0.0138	0.1258	0.1057	7.5000e-004		9.5600e-003	9.5600e-003		9.5600e-003	9.5600e-003		150.9911	150.9911	2.8900e-003	2.7700e-003	151.8884
High Turnover (Sit Down Restaurant)	22.7599	0.2455	2.2314	1.8743	0.0134		0.1696	0.1696		0.1696	0.1696		2,677.6342	2,677.6342	0.0513	0.0491	2,693.5460
Hotel	4.76972	0.0514	0.4676	0.3928	2.8100e-003		0.0355	0.0355		0.0355	0.0355		561.1436	561.1436	0.0108	0.0103	564.4782
Quality Restaurant	5.05775	0.0545	0.4959	0.4165	2.9800e-003		0.0377	0.0377		0.0377	0.0377		595.0298	595.0298	0.0114	0.0109	598.5658
Regional Shopping Center	0.251616	2.7100e-003	0.0247	0.0207	1.5000e-004		1.8700e-003	1.8700e-003		1.8700e-003	1.8700e-003		29.6019	29.6019	5.7000e-004	5.4000e-004	29.7778
Total		**0.7660**	**6.7463**	**4.2573**	**0.0418**		**0.5292**	**0.5292**		**0.5292**	**0.5292**		**8,355.9832**	**8,355.9832**	**0.1602**	**0.1532**	**8,405.6387**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192
Unmitigated	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	2.2670					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	24.1085					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	1.6500	14.1000	6.0000	0.0900		1.1400	1.1400		1.1400	1.1400	0.0000	18,000.0000	18,000.0000	0.3450	0.3300	18,106.9650
Landscaping	2.4766	0.9496	82.4430	4.3600e-003		0.4574	0.4574		0.4574	0.4574		148.5950	148.5950	0.1424		152.1542
Total	**30.5020**	**15.0496**	**88.4430**	**0.0944**		**1.5974**	**1.5974**		**1.5974**	**1.5974**	**0.0000**	**18,148.5950**	**18,148.5950**	**0.4874**	**0.3300**	**18,259.1192**

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	2.2670					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	24.1085					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	1.6500	14.1000	6.0000	0.0900		1.1400	1.1400		1.1400	1.1400	0.0000	18,000.0000	18,000.0000	0.3450	0.3300	18,106.9650
Landscaping	2.4766	0.9496	82.4430	4.3600e-003		0.4574	0.4574		0.4574	0.4574		148.5950	148.5950	0.1424		152.1542
Total	**30.5020**	**15.0496**	**88.4430**	**0.0944**		**1.5974**	**1.5974**		**1.5974**	**1.5974**	**0.0000**	**18,148.5950**	**18,148.5950**	**0.4874**	**0.3300**	**18,259.1192**

7.0 Water Detail

7.1 Mitigation Measures Water

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

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

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

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

Boilers

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

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

Village South Specific Plan (Proposed)

Los Angeles-South Coast County, Annual

1.0 Project Characteristics

1.1 Land Usage

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

1.2 Other Project Characteristics

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

1.3 User Entered Comments & Non-Default Data

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

Project Characteristics - Consistent with the DEIR's model.

Land Use - See SWAPE comment regarding residential and retail land uses.

Construction Phase - See SWAPE comment regarding individual construction phase lengths.

Demolition - Consistent with the DEIR's model. See SWAPE comment regarding demolition.

Vehicle Trips - Saturday trips consistent with the DEIR's model. See SWAPE comment regarding weekday and Sunday trips.

Woodstoves - Woodstoves and wood-burning fireplaces consistent with the DEIR's model. See SWAPE comment regarding gas fireplaces.

Energy Use -

Construction Off-road Equipment Mitigation - See SWAPE comment on construction-related mitigation.

Area Mitigation - See SWAPE comment regarding operational mitigation measures.

Water Mitigation - See SWAPE comment regarding operational mitigation measures.

Trips and VMT - Local hire provision

Table Name	Column Name	Default Value	New Value
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	NumberWood	1.25	0.00
tblFireplaces	NumberWood	48.75	0.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblVehicleTrips	ST_TR	7.16	6.17
tblVehicleTrips	ST_TR	6.39	3.87
tblVehicleTrips	ST_TR	2.46	1.39
tblVehicleTrips	ST_TR	158.37	79.82

tblVehicleTrips	ST_TR	8.19	3.75
tblVehicleTrips	ST_TR	94.36	63.99
tblVehicleTrips	ST_TR	49.97	10.74
tblVehicleTrips	SU_TR	6.07	6.16
tblVehicleTrips	SU_TR	5.86	4.18
tblVehicleTrips	SU_TR	1.05	0.69
tblVehicleTrips	SU_TR	131.84	78.27
tblVehicleTrips	SU_TR	5.95	3.20
tblVehicleTrips	SU_TR	72.16	57.65
tblVehicleTrips	SU_TR	25.24	6.39
tblVehicleTrips	WD_TR	6.59	5.83
tblVehicleTrips	WD_TR	6.65	4.13
tblVehicleTrips	WD_TR	11.03	6.41
tblVehicleTrips	WD_TR	127.15	65.80
tblVehicleTrips	WD_TR	8.17	3.84
tblVehicleTrips	WD_TR	89.95	62.64
tblVehicleTrips	WD_TR	42.70	9.43
tblWoodstoves	NumberCatalytic	1.25	0.00
tblWoodstoves	NumberCatalytic	48.75	0.00
tblWoodstoves	NumberNoncatalytic	1.25	0.00
tblWoodstoves	NumberNoncatalytic	48.75	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00

2.0 Emissions Summary

2.1 Overall Construction

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2021	0.1704	1.8234	1.1577	2.3800e-003	0.4141	0.0817	0.4958	0.1788	0.0754	0.2542	0.0000	210.7654	210.7654	0.0600	0.0000	212.2661
2022	0.5865	4.0240	5.1546	0.0155	0.9509	0.1175	1.0683	0.2518	0.1103	0.3621	0.0000	1,418.6554	1,418.6554	0.1215	0.0000	1,421.6925
2023	0.5190	3.2850	4.7678	0.0147	0.8497	0.0971	0.9468	0.2283	0.0912	0.3195	0.0000	1,342.4412	1,342.4412	0.1115	0.0000	1,345.2291
2024	4.1592	0.1313	0.2557	5.0000e-004	0.0221	6.3900e-003	0.0285	5.8700e-003	5.9700e-003	0.0118	0.0000	44.6355	44.6355	7.8300e-003	0.0000	44.8311
Maximum	**4.1592**	**4.0240**	**5.1546**	**0.0155**	**0.9509**	**0.1175**	**1.0683**	**0.2518**	**0.1103**	**0.3621**	**0.0000**	**1,418.6554**	**1,418.6554**	**0.1215**	**0.0000**	**1,421.6925**

2.1 Overall Construction

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2021	0.1704	1.8234	1.1577	2.3800e-003	0.4141	0.0817	0.4958	0.1788	0.0754	0.2542	0.0000	210.7651	210.7651	0.0600	0.0000	212.2658
2022	0.5865	4.0240	5.1546	0.0155	0.9509	0.1175	1.0683	0.2518	0.1103	0.3621	0.0000	1,418.6550	1,418.6550	0.1215	0.0000	1,421.6921
2023	0.5190	3.2850	4.7678	0.0147	0.8497	0.0971	0.9468	0.2283	0.0912	0.3195	0.0000	1,342.4409	1,342.4409	0.1115	0.0000	1,345.2287
2024	4.1592	0.1313	0.2557	5.0000e-004	0.0221	6.3900e-003	0.0285	5.8700e-003	5.9700e-003	0.0118	0.0000	44.6354	44.6354	7.8300e-003	0.0000	44.8311
Maximum	**4.1592**	**4.0240**	**5.1546**	**0.0155**	**0.9509**	**0.1175**	**1.0683**	**0.2518**	**0.1103**	**0.3621**	**0.0000**	**1,418.6550**	**1,418.6550**	**0.1215**	**0.0000**	**1,421.6921**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
1	9-1-2021	11-30-2021	1.4091	1.4091
2	12-1-2021	2-28-2022	1.3329	1.3329
3	3-1-2022	5-31-2022	1.1499	1.1499
4	6-1-2022	8-31-2022	1.1457	1.1457
5	9-1-2022	11-30-2022	1.1415	1.1415
6	12-1-2022	2-28-2023	1.0278	1.0278
7	3-1-2023	5-31-2023	0.9868	0.9868
8	6-1-2023	8-31-2023	0.9831	0.9831

9	**9-1-2023**	**11-30-2023**	0.9798	0.9798
10	**12-1-2023**	**2-29-2024**	2.8757	2.8757
11	**3-1-2024**	**5-31-2024**	1.6188	1.6188
		Highest	2.8757	2.8757

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	5.1437	0.2950	10.3804	1.6700e-003		0.0714	0.0714		0.0714	0.0714	0.0000	220.9670	220.9670	0.0201	3.7400e-003	222.5835
Energy	0.1398	1.2312	0.7770	7.6200e-003		0.0966	0.0966		0.0966	0.0966	0.0000	3,896.0732	3,896.0732	0.1303	0.0468	3,913.2833
Mobile	1.5857	7.9962	19.1834	0.0821	7.7979	0.0580	7.8559	2.0895	0.0539	2.1434	0.0000	7,620.4986	7,620.4986	0.3407	0.0000	7,629.0162
Waste						0.0000	0.0000		0.0000	0.0000	207.8079	0.0000	207.8079	12.2811	0.0000	514.8354
Water						0.0000	0.0000		0.0000	0.0000	29.1632	556.6420	585.8052	3.0183	0.0755	683.7567
Total	**6.8692**	**9.5223**	**30.3407**	**0.0914**	**7.7979**	**0.2260**	**8.0240**	**2.0895**	**0.2219**	**2.3114**	**236.9712**	**12,294.1807**	**12,531.1519**	**15.7904**	**0.1260**	**12,963.4751**

2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	5.1437	0.2950	10.3804	1.6700e-003		0.0714	0.0714		0.0714	0.0714	0.0000	220.9670	220.9670	0.0201	3.7400e-003	222.5835
Energy	0.1398	1.2312	0.7770	7.6200e-003		0.0966	0.0966		0.0966	0.0966	0.0000	3,896.0732	3,896.0732	0.1303	0.0468	3,913.2833
Mobile	1.5857	7.9962	19.1834	0.0821	7.7979	0.0580	7.8559	2.0895	0.0539	2.1434	0.0000	7,620.4986	7,620.4986	0.3407	0.0000	7,629.0162
Waste						0.0000	0.0000		0.0000	0.0000	207.8079	0.0000	207.8079	12.2811	0.0000	514.8354
Water						0.0000	0.0000		0.0000	0.0000	29.1632	556.6420	585.8052	3.0183	0.0755	683.7567
Total	**6.8692**	**9.5223**	**30.3407**	**0.0914**	**7.7979**	**0.2260**	**8.0240**	**2.0895**	**0.2219**	**2.3114**	**236.9712**	**12,294.1807**	**12,531.1519**	**15.7904**	**0.1260**	**12,963.4751**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

3.0 Construction Detail

Construction Phase

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

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

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 112.5

Acres of Paving: 0

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

OffRoad Equipment

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

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

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	6	15.00	0.00	458.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	7	18.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	801.00	143.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	160.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Demolition - 2021

Unmitigated Construction On-Site

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

3.2 Demolition - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	1.9300e-003	0.0634	0.0148	1.8000e-004	3.9400e-003	1.9000e-004	4.1300e-003	1.0800e-003	1.8000e-004	1.2600e-003	0.0000	17.4566	17.4566	1.2100e-003	0.0000	17.4869
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	7.2000e-004	5.3000e-004	6.0900e-003	2.0000e-005	1.6800e-003	1.0000e-005	1.6900e-003	4.5000e-004	1.0000e-005	4.6000e-004	0.0000	1.5281	1.5281	5.0000e-005	0.0000	1.5293
Total	**2.6500e-003**	**0.0639**	**0.0209**	**2.0000e-004**	**5.6200e-003**	**2.0000e-004**	**5.8200e-003**	**1.5300e-003**	**1.9000e-004**	**1.7200e-003**	**0.0000**	**18.9847**	**18.9847**	**1.2600e-003**	**0.0000**	**19.0161**

Mitigated Construction On-Site

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

3.2 Demolition - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	1.9300e-003	0.0634	0.0148	1.8000e-004	3.9400e-003	1.9000e-004	4.1300e-003	1.0800e-003	1.8000e-004	1.2600e-003	0.0000	17.4566	17.4566	1.2100e-003	0.0000	17.4869
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	7.2000e-004	5.3000e-004	6.0900e-003	2.0000e-005	1.6800e-003	1.0000e-005	1.6900e-003	4.5000e-004	1.0000e-005	4.6000e-004	0.0000	1.5281	1.5281	5.0000e-005	0.0000	1.5293
Total	**2.6500e-003**	**0.0639**	**0.0209**	**2.0000e-004**	**5.6200e-003**	**2.0000e-004**	**5.8200e-003**	**1.5300e-003**	**1.9000e-004**	**1.7200e-003**	**0.0000**	**18.9847**	**18.9847**	**1.2600e-003**	**0.0000**	**19.0161**

3.3 Site Preparation - 2021

Unmitigated Construction On-Site

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

3.3 Site Preparation - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.8000e-004	4.3000e-004	4.8700e-003	1.0000e-005	1.3400e-003	1.0000e-005	1.3500e-003	3.6000e-004	1.0000e-005	3.7000e-004	0.0000	1.2225	1.2225	4.0000e-005	0.0000	1.2234
Total	**5.8000e-004**	**4.3000e-004**	**4.8700e-003**	**1.0000e-005**	**1.3400e-003**	**1.0000e-005**	**1.3500e-003**	**3.6000e-004**	**1.0000e-005**	**3.7000e-004**	**0.0000**	**1.2225**	**1.2225**	**4.0000e-005**	**0.0000**	**1.2234**

Mitigated Construction On-Site

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

3.3 Site Preparation - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.8000e-004	4.3000e-004	4.8700e-003	1.0000e-005	1.3400e-003	1.0000e-005	1.3500e-003	3.6000e-004	1.0000e-005	3.7000e-004	0.0000	1.2225	1.2225	4.0000e-005	0.0000	1.2234
Total	**5.8000e-004**	**4.3000e-004**	**4.8700e-003**	**1.0000e-005**	**1.3400e-003**	**1.0000e-005**	**1.3500e-003**	**3.6000e-004**	**1.0000e-005**	**3.7000e-004**	**0.0000**	**1.2225**	**1.2225**	**4.0000e-005**	**0.0000**	**1.2234**

3.4 Grading - 2021

Unmitigated Construction On-Site

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

3.4 Grading - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.2200e-003	9.0000e-004	0.0103	3.0000e-005	2.8300e-003	2.0000e-005	2.8600e-003	7.5000e-004	2.0000e-005	7.8000e-004	0.0000	2.5808	2.5808	8.0000e-005	0.0000	2.5828
Total	**1.2200e-003**	**9.0000e-004**	**0.0103**	**3.0000e-005**	**2.8300e-003**	**2.0000e-005**	**2.8600e-003**	**7.5000e-004**	**2.0000e-005**	**7.8000e-004**	**0.0000**	**2.5808**	**2.5808**	**8.0000e-005**	**0.0000**	**2.5828**

Mitigated Construction On-Site

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

3.4 Grading - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.2200e-003	9.0000e-004	0.0103	3.0000e-005	2.8300e-003	2.0000e-005	2.8600e-003	7.5000e-004	2.0000e-005	7.8000e-004	0.0000	2.5808	2.5808	8.0000e-005	0.0000	2.5828
Total	**1.2200e-003**	**9.0000e-004**	**0.0103**	**3.0000e-005**	**2.8300e-003**	**2.0000e-005**	**2.8600e-003**	**7.5000e-004**	**2.0000e-005**	**7.8000e-004**	**0.0000**	**2.5808**	**2.5808**	**8.0000e-005**	**0.0000**	**2.5828**

3.4 Grading - 2022

Unmitigated Construction On-Site

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

3.4 Grading - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.1000e-004	1.5000e-004	1.7400e-003	1.0000e-005	5.2000e-004	0.0000	5.3000e-004	1.4000e-004	0.0000	1.4000e-004	0.0000	0.4587	0.4587	1.0000e-005	0.0000	0.4590
Total	**2.1000e-004**	**1.5000e-004**	**1.7400e-003**	**1.0000e-005**	**5.2000e-004**	**0.0000**	**5.3000e-004**	**1.4000e-004**	**0.0000**	**1.4000e-004**	**0.0000**	**0.4587**	**0.4587**	**1.0000e-005**	**0.0000**	**0.4590**

Mitigated Construction On-Site

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

3.4 Grading - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.1000e-004	1.5000e-004	1.7400e-003	1.0000e-005	5.2000e-004	0.0000	5.3000e-004	1.4000e-004	0.0000	1.4000e-004	0.0000	0.4587	0.4587	1.0000e-005	0.0000	0.4590
Total	**2.1000e-004**	**1.5000e-004**	**1.7400e-003**	**1.0000e-005**	**5.2000e-004**	**0.0000**	**5.3000e-004**	**1.4000e-004**	**0.0000**	**1.4000e-004**	**0.0000**	**0.4587**	**0.4587**	**1.0000e-005**	**0.0000**	**0.4590**

3.5 Building Construction - 2022

Unmitigated Construction On-Site

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

3.5 Building Construction - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0527	1.6961	0.4580	4.5500e-003	0.1140	3.1800e-003	0.1171	0.0329	3.0400e-003	0.0359	0.0000	441.9835	441.9835	0.0264	0.0000	442.6435
Worker	0.3051	0.2164	2.5233	7.3500e-003	0.7557	6.2300e-003	0.7619	0.2007	5.7400e-003	0.2065	0.0000	663.9936	663.9936	0.0187	0.0000	664.4604
Total	**0.3578**	**1.9125**	**2.9812**	**0.0119**	**0.8696**	**9.4100e-003**	**0.8790**	**0.2336**	**8.7800e-003**	**0.2424**	**0.0000**	**1,105.9771**	**1,105.9771**	**0.0451**	**0.0000**	**1,107.1039**

Mitigated Construction On-Site

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

3.5 Building Construction - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0527	1.6961	0.4580	4.5500e-003	0.1140	3.1800e-003	0.1171	0.0329	3.0400e-003	0.0359	0.0000	441.9835	441.9835	0.0264	0.0000	442.6435
Worker	0.3051	0.2164	2.5233	7.3500e-003	0.7557	6.2300e-003	0.7619	0.2007	5.7400e-003	0.2065	0.0000	663.9936	663.9936	0.0187	0.0000	664.4604
Total	**0.3578**	**1.9125**	**2.9812**	**0.0119**	**0.8696**	**9.4100e-003**	**0.8790**	**0.2336**	**8.7800e-003**	**0.2424**	**0.0000**	**1,105.9771**	**1,105.9771**	**0.0451**	**0.0000**	**1,107.1039**

3.5 Building Construction - 2023

Unmitigated Construction On-Site

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

3.5 Building Construction - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0382	1.2511	0.4011	4.3000e-003	0.1113	1.4600e-003	0.1127	0.0321	1.4000e-003	0.0335	0.0000	417.9930	417.9930	0.0228	0.0000	418.5624
Worker	0.2795	0.1910	2.2635	6.9100e-003	0.7377	5.9100e-003	0.7436	0.1960	5.4500e-003	0.2014	0.0000	624.5363	624.5363	0.0164	0.0000	624.9466
Total	**0.3177**	**1.4420**	**2.6646**	**0.0112**	**0.8490**	**7.3700e-003**	**0.8564**	**0.2281**	**6.8500e-003**	**0.2349**	**0.0000**	**1,042.5294**	**1,042.5294**	**0.0392**	**0.0000**	**1,043.5090**

Mitigated Construction On-Site

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

3.5 Building Construction - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0382	1.2511	0.4011	4.3000e-003	0.1113	1.4600e-003	0.1127	0.0321	1.4000e-003	0.0335	0.0000	417.9930	417.9930	0.0228	0.0000	418.5624
Worker	0.2795	0.1910	2.2635	6.9100e-003	0.7377	5.9100e-003	0.7436	0.1960	5.4500e-003	0.2014	0.0000	624.5363	624.5363	0.0164	0.0000	624.9466
Total	**0.3177**	**1.4420**	**2.6646**	**0.0112**	**0.8490**	**7.3700e-003**	**0.8564**	**0.2281**	**6.8500e-003**	**0.2349**	**0.0000**	**1,042.5294**	**1,042.5294**	**0.0392**	**0.0000**	**1,043.5090**

3.6 Paving - 2023

Unmitigated Construction On-Site

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

3.6 Paving - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.8000e-004	1.9000e-004	2.2300e-003	1.0000e-005	7.3000e-004	1.0000e-005	7.3000e-004	1.9000e-004	1.0000e-005	2.0000e-004	0.0000	0.6156	0.6156	2.0000e-005	0.0000	0.6160
Total	**2.8000e-004**	**1.9000e-004**	**2.2300e-003**	**1.0000e-005**	**7.3000e-004**	**1.0000e-005**	**7.3000e-004**	**1.9000e-004**	**1.0000e-005**	**2.0000e-004**	**0.0000**	**0.6156**	**0.6156**	**2.0000e-005**	**0.0000**	**0.6160**

Mitigated Construction On-Site

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

3.6 Paving - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.8000e-004	1.9000e-004	2.2300e-003	1.0000e-005	7.3000e-004	1.0000e-005	7.3000e-004	1.9000e-004	1.0000e-005	2.0000e-004	0.0000	0.6156	0.6156	2.0000e-005	0.0000	0.6160
Total	**2.8000e-004**	**1.9000e-004**	**2.2300e-003**	**1.0000e-005**	**7.3000e-004**	**1.0000e-005**	**7.3000e-004**	**1.9000e-004**	**1.0000e-005**	**2.0000e-004**	**0.0000**	**0.6156**	**0.6156**	**2.0000e-005**	**0.0000**	**0.6160**

3.6 Paving - 2024

Unmitigated Construction On-Site

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

3.6 Paving - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	4.4000e-004	2.9000e-004	3.5100e-003	1.0000e-005	1.2300e-003	1.0000e-005	1.2400e-003	3.3000e-004	1.0000e-005	3.4000e-004	0.0000	1.0094	1.0094	3.0000e-005	0.0000	1.0100
Total	**4.4000e-004**	**2.9000e-004**	**3.5100e-003**	**1.0000e-005**	**1.2300e-003**	**1.0000e-005**	**1.2400e-003**	**3.3000e-004**	**1.0000e-005**	**3.4000e-004**	**0.0000**	**1.0094**	**1.0094**	**3.0000e-005**	**0.0000**	**1.0100**

Mitigated Construction On-Site

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

3.6 Paving - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	4.4000e-004	2.9000e-004	3.5100e-003	1.0000e-005	1.2300e-003	1.0000e-005	1.2400e-003	3.3000e-004	1.0000e-005	3.4000e-004	0.0000	1.0094	1.0094	3.0000e-005	0.0000	1.0100
Total	**4.4000e-004**	**2.9000e-004**	**3.5100e-003**	**1.0000e-005**	**1.2300e-003**	**1.0000e-005**	**1.2400e-003**	**3.3000e-004**	**1.0000e-005**	**3.4000e-004**	**0.0000**	**1.0094**	**1.0094**	**3.0000e-005**	**0.0000**	**1.0100**

3.7 Architectural Coating - 2024

Unmitigated Construction On-Site

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

3.7 Architectural Coating - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	7.4800e-003	4.9300e-003	0.0596	1.9000e-004	0.0209	1.6000e-004	0.0211	5.5500e-003	1.5000e-004	5.7000e-003	0.0000	17.1287	17.1287	4.3000e-004	0.0000	17.1394
Total	**7.4800e-003**	**4.9300e-003**	**0.0596**	**1.9000e-004**	**0.0209**	**1.6000e-004**	**0.0211**	**5.5500e-003**	**1.5000e-004**	**5.7000e-003**	**0.0000**	**17.1287**	**17.1287**	**4.3000e-004**	**0.0000**	**17.1394**

Mitigated Construction On-Site

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

3.7 Architectural Coating - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	7.4800e-003	4.9300e-003	0.0596	1.9000e-004	0.0209	1.6000e-004	0.0211	5.5500e-003	1.5000e-004	5.7000e-003	0.0000	17.1287	17.1287	4.3000e-004	0.0000	17.1394
Total	**7.4800e-003**	**4.9300e-003**	**0.0596**	**1.9000e-004**	**0.0209**	**1.6000e-004**	**0.0211**	**5.5500e-003**	**1.5000e-004**	**5.7000e-003**	**0.0000**	**17.1287**	**17.1287**	**4.3000e-004**	**0.0000**	**17.1394**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

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

4.2 Trip Summary Information

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

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments Low Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3
Apartments Mid Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3
General Office Building	16.60	8.40	6.90	33.00	48.00	19.00	77	19	4
High Turnover (Sit Down	16.60	8.40	6.90	8.50	72.50	19.00	37	20	43
Hotel	16.60	8.40	6.90	19.40	61.60	19.00	58	38	4
Quality Restaurant	16.60	8.40	6.90	12.00	69.00	19.00	38	18	44
Regional Shopping Center	16.60	8.40	6.90	16.30	64.70	19.00	54	35	11

4.4 Fleet Mix

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

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

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

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

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Apartments Low Rise	408494	2.2000e-003	0.0188	8.0100e-003	1.2000e-004		1.5200e-003	1.5200e-003		1.5200e-003	1.5200e-003	0.0000	21.7988	21.7988	4.2000e-004	4.0000e-004	21.9284
Apartments Mid Rise	1.30613e+007	0.0704	0.6018	0.2561	3.8400e-003		0.0487	0.0487		0.0487	0.0487	0.0000	696.9989	696.9989	0.0134	0.0128	701.1408
General Office Building	468450	2.5300e-003	0.0230	0.0193	1.4000e-004		1.7500e-003	1.7500e-003		1.7500e-003	1.7500e-003	0.0000	24.9983	24.9983	4.8000e-004	4.6000e-004	25.1468
High Turnover (Sit Down Restaurant)	8.30736e+006	0.0448	0.4072	0.3421	2.4400e-003		0.0310	0.0310		0.0310	0.0310	0.0000	443.3124	443.3124	8.5000e-003	8.1300e-003	445.9468
Hotel	1.74095e+006	9.3900e-003	0.0853	0.0717	5.1000e-004		6.4900e-003	6.4900e-003		6.4900e-003	6.4900e-003	0.0000	92.9036	92.9036	1.7800e-003	1.7000e-003	93.4557
Quality Restaurant	1.84608e+006	9.9500e-003	0.0905	0.0760	5.4000e-004		6.8800e-003	6.8800e-003		6.8800e-003	6.8800e-003	0.0000	98.5139	98.5139	1.8900e-003	1.8100e-003	99.0993
Regional Shopping Center	91840	5.0000e-004	4.5000e-003	3.7800e-003	3.0000e-005		3.4000e-004	3.4000e-004		3.4000e-004	3.4000e-004	0.0000	4.9009	4.9009	9.0000e-005	9.0000e-005	4.9301
Total		**0.1398**	**1.2312**	**0.7770**	**7.6200e-003**		**0.0966**	**0.0966**		**0.0966**	**0.0966**	**0.0000**	**1,383.4268**	**1,383.4268**	**0.0265**	**0.0254**	**1,391.6478**

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Apartments Low Rise	408494	2.2000e-003	0.0188	8.0100e-003	1.2000e-004		1.5200e-003	1.5200e-003		1.5200e-003	1.5200e-003	0.0000	21.7988	21.7988	4.2000e-004	4.0000e-004	21.9284
Apartments Mid Rise	1.30613e+007	0.0704	0.6018	0.2561	3.8400e-003		0.0487	0.0487		0.0487	0.0487	0.0000	696.9989	696.9989	0.0134	0.0128	701.1408
General Office Building	468450	2.5300e-003	0.0230	0.0193	1.4000e-004		1.7500e-003	1.7500e-003		1.7500e-003	1.7500e-003	0.0000	24.9983	24.9983	4.8000e-004	4.6000e-004	25.1468
High Turnover (Sit Down Restaurant)	8.30736e+006	0.0448	0.4072	0.3421	2.4400e-003		0.0310	0.0310		0.0310	0.0310	0.0000	443.3124	443.3124	8.5000e-003	8.1300e-003	445.9468
Hotel	1.74095e+006	9.3900e-003	0.0853	0.0717	5.1000e-004		6.4900e-003	6.4900e-003		6.4900e-003	6.4900e-003	0.0000	92.9036	92.9036	1.7800e-003	1.7000e-003	93.4557
Quality Restaurant	1.84608e+006	9.9500e-003	0.0905	0.0760	5.4000e-004		6.8800e-003	6.8800e-003		6.8800e-003	6.8800e-003	0.0000	98.5139	98.5139	1.8900e-003	1.8100e-003	99.0993
Regional Shopping Center	91840	5.0000e-004	4.5000e-003	3.7800e-003	3.0000e-005		3.4000e-004	3.4000e-004		3.4000e-004	3.4000e-004	0.0000	4.9009	4.9009	9.0000e-005	9.0000e-005	4.9301
Total		**0.1398**	**1.2312**	**0.7770**	**7.6200e-003**		**0.0966**	**0.0966**		**0.0966**	**0.0966**	**0.0000**	**1,383.4268**	**1,383.4268**	**0.0265**	**0.0254**	**1,391.6478**

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Apartments Low Rise	106010	33.7770	1.3900e-003	2.9000e-004	33.8978
Apartments Mid Rise	3.94697e+006	1,257.5879	0.0519	0.0107	1,262.0869
General Office Building	584550	186.2502	7.6900e-003	1.5900e-003	186.9165
High Turnover (Sit Down Restaurant)	1.58904e+006	506.3022	0.0209	4.3200e-003	508.1135
Hotel	550308	175.3399	7.2400e-003	1.5000e-003	175.9672
Quality Restaurant	353120	112.5116	4.6500e-003	9.6000e-004	112.9141
Regional Shopping Center	756000	240.8778	9.9400e-003	2.0600e-003	241.7395
Total		**2,512.6465**	**0.1037**	**0.0215**	**2,521.6356**

5.3 Energy by Land Use - Electricity

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Apartments Low Rise	106010	33.7770	1.3900e-003	2.9000e-004	33.8978
Apartments Mid Rise	3.94697e+006	1,257.5879	0.0519	0.0107	1,262.0869
General Office Building	584550	186.2502	7.6900e-003	1.5900e-003	186.9165
High Turnover (Sit Down Restaurant)	1.58904e+006	506.3022	0.0209	4.3200e-003	508.1135
Hotel	550308	175.3399	7.2400e-003	1.5000e-003	175.9672
Quality Restaurant	353120	112.5116	4.6500e-003	9.6000e-004	112.9141
Regional Shopping Center	756000	240.8778	9.9400e-003	2.0600e-003	241.7395
Total		**2,512.6465**	**0.1037**	**0.0215**	**2,521.6356**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	5.1437	0.2950	10.3804	1.6700e-003		0.0714	0.0714		0.0714	0.0714	0.0000	220.9670	220.9670	0.0201	3.7400e-003	222.5835
Unmitigated	5.1437	0.2950	10.3804	1.6700e-003		0.0714	0.0714		0.0714	0.0714	0.0000	220.9670	220.9670	0.0201	3.7400e-003	222.5835

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.4137					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	4.3998					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0206	0.1763	0.0750	1.1200e-003		0.0143	0.0143		0.0143	0.0143	0.0000	204.1166	204.1166	3.9100e-003	3.7400e-003	205.3295
Landscaping	0.3096	0.1187	10.3054	5.4000e-004		0.0572	0.0572		0.0572	0.0572	0.0000	16.8504	16.8504	0.0161	0.0000	17.2540
Total	**5.1437**	**0.2950**	**10.3804**	**1.6600e-003**		**0.0714**	**0.0714**		**0.0714**	**0.0714**	**0.0000**	**220.9670**	**220.9670**	**0.0201**	**3.7400e-003**	**222.5835**

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.4137					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	4.3998					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0206	0.1763	0.0750	1.1200e-003		0.0143	0.0143		0.0143	0.0143	0.0000	204.1166	204.1166	3.9100e-003	3.7400e-003	205.3295
Landscaping	0.3096	0.1187	10.3054	5.4000e-004		0.0572	0.0572		0.0572	0.0572	0.0000	16.8504	16.8504	0.0161	0.0000	17.2540
Total	**5.1437**	**0.2950**	**10.3804**	**1.6600e-003**		**0.0714**	**0.0714**		**0.0714**	**0.0714**	**0.0000**	**220.9670**	**220.9670**	**0.0201**	**3.7400e-003**	**222.5835**

7.0 Water Detail

7.1 Mitigation Measures Water

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

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

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Apartments Low Rise	1.62885 / 1.02688	10.9095	0.0535	1.3400e-003	12.6471
Apartments Mid Rise	63.5252 / 40.0485	425.4719	2.0867	0.0523	493.2363
General Office Building	7.99802 / 4.90201	53.0719	0.2627	6.5900e-003	61.6019
High Turnover (Sit Down Restaurant)	10.9272 / 0.697482	51.2702	0.3580	8.8200e-003	62.8482
Hotel	1.26834 / 0.140927	6.1633	0.0416	1.0300e-003	7.5079
Quality Restaurant	2.42827 / 0.154996	11.3934	0.0796	1.9600e-003	13.9663
Regional Shopping Center	4.14806 / 2.54236	27.5250	0.1363	3.4200e-003	31.9490
Total		**585.8052**	**3.0183**	**0.0755**	**683.7567**

7.2 Water by Land Use

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Apartments Low Rise	1.62885 / 1.02688	10.9095	0.0535	1.3400e-003	12.6471
Apartments Mid Rise	63.5252 / 40.0485	425.4719	2.0867	0.0523	493.2363
General Office Building	7.99802 / 4.90201	53.0719	0.2627	6.5900e-003	61.6019
High Turnover (Sit Down Restaurant)	10.9272 / 0.697482	51.2702	0.3580	8.8200e-003	62.8482
Hotel	1.26834 / 0.140927	6.1633	0.0416	1.0300e-003	7.5079
Quality Restaurant	2.42827 / 0.154996	11.3934	0.0796	1.9600e-003	13.9663
Regional Shopping Center	4.14806 / 2.54236	27.5250	0.1363	3.4200e-003	31.9490
Total		**585.8052**	**3.0183**	**0.0755**	**683.7567**

8.0 Waste Detail

8.1 Mitigation Measures Waste

Category/Year

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

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Apartments Low Rise	11.5	2.3344	0.1380	0.0000	5.7834
Apartments Mid Rise	448.5	91.0415	5.3804	0.0000	225.5513
General Office Building	41.85	8.4952	0.5021	0.0000	21.0464
High Turnover (Sit Down Restaurant)	428.4	86.9613	5.1393	0.0000	215.4430
Hotel	27.38	5.5579	0.3285	0.0000	13.7694
Quality Restaurant	7.3	1.4818	0.0876	0.0000	3.6712
Regional Shopping Center	58.8	11.9359	0.7054	0.0000	29.5706
Total		**207.8079**	**12.2811**	**0.0000**	**514.8354**

8.2 Waste by Land Use

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Apartments Low Rise	11.5	2.3344	0.1380	0.0000	5.7834
Apartments Mid Rise	448.5	91.0415	5.3804	0.0000	225.5513
General Office Building	41.85	8.4952	0.5021	0.0000	21.0464
High Turnover (Sit Down Restaurant)	428.4	86.9613	5.1393	0.0000	215.4430
Hotel	27.38	5.5579	0.3285	0.0000	13.7694
Quality Restaurant	7.3	1.4818	0.0876	0.0000	3.6712
Regional Shopping Center	58.8	11.9359	0.7054	0.0000	29.5706
Total		**207.8079**	**12.2811**	**0.0000**	**514.8354**

9.0 Operational Offroad

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

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

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

Boilers

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

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

Village South Specific Plan (Proposed)

Los Angeles-South Coast County, Summer

1.0 Project Characteristics

1.1 Land Usage

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

1.2 Other Project Characteristics

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

1.3 User Entered Comments & Non-Default Data

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

Project Characteristics - Consistent with the DEIR's model.

Land Use - See SWAPE comment regarding residential and retail land uses.

Construction Phase - See SWAPE comment regarding individual construction phase lengths.

Demolition - Consistent with the DEIR's model. See SWAPE comment regarding demolition.

Vehicle Trips - Saturday trips consistent with the DEIR's model. See SWAPE comment regarding weekday and Sunday trips.

Woodstoves - Woodstoves and wood-burning fireplaces consistent with the DEIR's model. See SWAPE comment regarding gas fireplaces.

Energy Use -

Construction Off-road Equipment Mitigation - See SWAPE comment on construction-related mitigation.

Area Mitigation - See SWAPE comment regarding operational mitigation measures.

Water Mitigation - See SWAPE comment regarding operational mitigation measures.

Trips and VMT - Local hire provision

Table Name	Column Name	Default Value	New Value
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	NumberWood	1.25	0.00
tblFireplaces	NumberWood	48.75	0.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblVehicleTrips	ST_TR	7.16	6.17
tblVehicleTrips	ST_TR	6.39	3.87
tblVehicleTrips	ST_TR	2.46	1.39
tblVehicleTrips	ST_TR	158.37	79.82

tblVehicleTrips	ST_TR	8.19	3.75
tblVehicleTrips	ST_TR	94.36	63.99
tblVehicleTrips	ST_TR	49.97	10.74
tblVehicleTrips	SU_TR	6.07	6.16
tblVehicleTrips	SU_TR	5.86	4.18
tblVehicleTrips	SU_TR	1.05	0.69
tblVehicleTrips	SU_TR	131.84	78.27
tblVehicleTrips	SU_TR	5.95	3.20
tblVehicleTrips	SU_TR	72.16	57.65
tblVehicleTrips	SU_TR	25.24	6.39
tblVehicleTrips	WD_TR	6.59	5.83
tblVehicleTrips	WD_TR	6.65	4.13
tblVehicleTrips	WD_TR	11.03	6.41
tblVehicleTrips	WD_TR	127.15	65.80
tblVehicleTrips	WD_TR	8.17	3.84
tblVehicleTrips	WD_TR	89.95	62.64
tblVehicleTrips	WD_TR	42.70	9.43
tblWoodstoves	NumberCatalytic	1.25	0.00
tblWoodstoves	NumberCatalytic	48.75	0.00
tblWoodstoves	NumberNoncatalytic	1.25	0.00
tblWoodstoves	NumberNoncatalytic	48.75	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00

2.0 Emissions Summary

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	4.2561	46.4415	31.4494	0.0636	18.2032	2.0456	20.2488	9.9670	1.8820	11.8490	0.0000	6,163.4166	6,163.4166	1.9475	0.0000	6,212.1039
2022	4.5441	38.8811	40.8776	0.1240	8.8255	1.6361	10.4616	3.6369	1.5052	5.1421	0.0000	12,493.4403	12,493.4403	1.9485	0.0000	12,518.5707
2023	4.1534	25.7658	38.7457	0.1206	7.0088	0.7592	7.7679	1.8799	0.7136	2.5935	0.0000	12,150.4890	12,150.4890	0.9589	0.0000	12,174.4615
2024	237.0219	9.5478	14.9642	0.0239	1.2171	0.4694	1.2875	0.3229	0.4319	0.4621	0.0000	2,313.1808	2,313.1808	0.7166	0.0000	2,331.0956
Maximum	**237.0219**	**46.4415**	**40.8776**	**0.1240**	**18.2032**	**2.0456**	**20.2488**	**9.9670**	**1.8820**	**11.8490**	**0.0000**	**12,493.4403**	**12,493.4403**	**1.9485**	**0.0000**	**12,518.5707**

2.1 Overall Construction (Maximum Daily Emission)

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	4.2561	46.4415	31.4494	0.0636	18.2032	2.0456	20.2488	9.9670	1.8820	11.8490	0.0000	6,163.4166	6,163.4166	1.9475	0.0000	6,212.1039
2022	4.5441	38.8811	40.8776	0.1240	8.8255	1.6361	10.4616	3.6369	1.5052	5.1421	0.0000	12,493.4403	12,493.4403	1.9485	0.0000	12,518.5707
2023	4.1534	25.7658	38.7457	0.1206	7.0088	0.7592	7.7679	1.8799	0.7136	2.5935	0.0000	12,150.4890	12,150.4890	0.9589	0.0000	12,174.4615
2024	237.0219	9.5478	14.9642	0.0239	1.2171	0.4694	1.2875	0.3229	0.4319	0.4621	0.0000	2,313.1808	2,313.1808	0.7166	0.0000	2,331.0955
Maximum	**237.0219**	**46.4415**	**40.8776**	**0.1240**	**18.2032**	**2.0456**	**20.2488**	**9.9670**	**1.8820**	**11.8490**	**0.0000**	**12,493.4403**	**12,493.4403**	**1.9485**	**0.0000**	**12,518.5707**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	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**

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192
Energy	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387
Mobile	9.8489	45.4304	114.8495	0.4917	45.9592	0.3360	46.2951	12.2950	0.3119	12.6070		50,306.6034	50,306.6034	2.1807		50,361.1208
Total	**41.1168**	**67.2262**	**207.5497**	**0.6278**	**45.9592**	**2.4626**	**48.4217**	**12.2950**	**2.4385**	**14.7336**	**0.0000**	**76,811.1816**	**76,811.1816**	**2.8282**	**0.4832**	**77,025.8786**

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192
Energy	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387
Mobile	9.8489	45.4304	114.8495	0.4917	45.9592	0.3360	46.2951	12.2950	0.3119	12.6070		50,306.6034	50,306.6034	2.1807		50,361.1208
Total	**41.1168**	**67.2262**	**207.5497**	**0.6278**	**45.9592**	**2.4626**	**48.4217**	**12.2950**	**2.4385**	**14.7336**	**0.0000**	**76,811.1816**	**76,811.1816**	**2.8282**	**0.4832**	**77,025.8786**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

3.0 Construction Detail

Construction Phase

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

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 112.5

Acres of Paving: 0

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

OffRoad Equipment

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

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

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	6	15.00	0.00	458.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	7	18.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	801.00	143.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	160.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Demolition - 2021

Unmitigated Construction On-Site

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

3.2 Demolition - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.1273	4.0952	0.9602	0.0119	0.2669	0.0126	0.2795	0.0732	0.0120	0.0852		1,292.2413	1,292.2413	0.0877		1,294.4337
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0487	0.0313	0.4282	1.1800e-003	0.1141	9.5000e-004	0.1151	0.0303	8.8000e-004	0.0311		117.2799	117.2799	3.5200e-003		117.3678
Total	**0.1760**	**4.1265**	**1.3884**	**0.0131**	**0.3810**	**0.0135**	**0.3946**	**0.1034**	**0.0129**	**0.1163**		**1,409.5212**	**1,409.5212**	**0.0912**		**1,411.8015**

Mitigated Construction On-Site

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

3.2 Demolition - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.1273	4.0952	0.9602	0.0119	0.2669	0.0126	0.2795	0.0732	0.0120	0.0852		1,292.2413	1,292.2413	0.0877		1,294.4337
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0487	0.0313	0.4282	1.1800e-003	0.1141	9.5000e-004	0.1151	0.0303	8.8000e-004	0.0311		117.2799	117.2799	3.5200e-003		117.3678
Total	**0.1760**	**4.1265**	**1.3884**	**0.0131**	**0.3810**	**0.0135**	**0.3946**	**0.1034**	**0.0129**	**0.1163**		**1,409.5212**	**1,409.5212**	**0.0912**		**1,411.8015**

3.3 Site Preparation - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307			0.0000			0.0000
Off-Road	3.8882	40.4971	21.1543	0.0380		2.0445	2.0445		1.8809	1.8809		3,685.6569	3,685.6569	1.1920		3,715.4573
Total	**3.8882**	**40.4971**	**21.1543**	**0.0380**	**18.0663**	**2.0445**	**20.1107**	**9.9307**	**1.8809**	**11.8116**		**3,685.6569**	**3,685.6569**	**1.1920**		**3,715.4573**

3.3 Site Preparation - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0584	0.0375	0.5139	1.4100e-003	0.1369	1.1400e-003	0.1381	0.0363	1.0500e-003	0.0374		140.7359	140.7359	4.2200e-003		140.8414
Total	**0.0584**	**0.0375**	**0.5139**	**1.4100e-003**	**0.1369**	**1.1400e-003**	**0.1381**	**0.0363**	**1.0500e-003**	**0.0374**		**140.7359**	**140.7359**	**4.2200e-003**		**140.8414**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307			0.0000			0.0000
Off-Road	3.8882	40.4971	21.1543	0.0380		2.0445	2.0445		1.8809	1.8809	0.0000	3,685.6569	3,685.6569	1.1920		3,715.4573
Total	**3.8882**	**40.4971**	**21.1543**	**0.0380**	**18.0663**	**2.0445**	**20.1107**	**9.9307**	**1.8809**	**11.8116**	**0.0000**	**3,685.6569**	**3,685.6569**	**1.1920**		**3,715.4573**

3.3 Site Preparation - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0584	0.0375	0.5139	1.4100e-003	0.1369	1.1400e-003	0.1381	0.0363	1.0500e-003	0.0374		140.7359	140.7359	4.2200e-003		140.8414
Total	**0.0584**	**0.0375**	**0.5139**	**1.4100e-003**	**0.1369**	**1.1400e-003**	**0.1381**	**0.0363**	**1.0500e-003**	**0.0374**		**140.7359**	**140.7359**	**4.2200e-003**		**140.8414**

3.4 Grading - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	4.1912	46.3998	30.8785	0.0620		1.9853	1.9853		1.8265	1.8265		6,007.0434	6,007.0434	1.9428		6,055.6134
Total	**4.1912**	**46.3998**	**30.8785**	**0.0620**	**8.6733**	**1.9853**	**10.6587**	**3.5965**	**1.8265**	**5.4230**		**6,007.0434**	**6,007.0434**	**1.9428**		**6,055.6134**

3.4 Grading - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0649	0.0417	0.5710	1.5700e-003	0.1521	1.2700e-003	0.1534	0.0404	1.1700e-003	0.0415		156.3732	156.3732	4.6900e-003		156.4904
Total	**0.0649**	**0.0417**	**0.5710**	**1.5700e-003**	**0.1521**	**1.2700e-003**	**0.1534**	**0.0404**	**1.1700e-003**	**0.0415**		**156.3732**	**156.3732**	**4.6900e-003**		**156.4904**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	4.1912	46.3998	30.8785	0.0620		1.9853	1.9853		1.8265	1.8265	0.0000	6,007.0434	6,007.0434	1.9428		6,055.6134
Total	**4.1912**	**46.3998**	**30.8785**	**0.0620**	**8.6733**	**1.9853**	**10.6587**	**3.5965**	**1.8265**	**5.4230**	**0.0000**	**6,007.0434**	**6,007.0434**	**1.9428**		**6,055.6134**

3.4 Grading - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0649	0.0417	0.5710	1.5700e-003	0.1521	1.2700e-003	0.1534	0.0404	1.1700e-003	0.0415		156.3732	156.3732	4.6900e-003		156.4904
Total	**0.0649**	**0.0417**	**0.5710**	**1.5700e-003**	**0.1521**	**1.2700e-003**	**0.1534**	**0.0404**	**1.1700e-003**	**0.0415**		**156.3732**	**156.3732**	**4.6900e-003**		**156.4904**

3.4 Grading - 2022

Unmitigated Construction On-Site

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

3.4 Grading - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0607	0.0376	0.5263	1.5100e-003	0.1521	1.2300e-003	0.1534	0.0404	1.1300e-003	0.0415		150.8754	150.8754	4.2400e-003		150.9813
Total	**0.0607**	**0.0376**	**0.5263**	**1.5100e-003**	**0.1521**	**1.2300e-003**	**0.1534**	**0.0404**	**1.1300e-003**	**0.0415**		**150.8754**	**150.8754**	**4.2400e-003**		**150.9813**

Mitigated Construction On-Site

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

3.4 Grading - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0607	0.0376	0.5263	1.5100e-003	0.1521	1.2300e-003	0.1534	0.0404	1.1300e-003	0.0415		150.8754	150.8754	4.2400e-003		150.9813
Total	**0.0607**	**0.0376**	**0.5263**	**1.5100e-003**	**0.1521**	**1.2300e-003**	**0.1534**	**0.0404**	**1.1300e-003**	**0.0415**		**150.8754**	**150.8754**	**4.2400e-003**		**150.9813**

3.5 Building Construction - 2022

Unmitigated Construction On-Site

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

3.5 Building Construction - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.4079	13.2032	3.4341	0.0364	0.9155	0.0248	0.9404	0.2636	0.0237	0.2873		3,896.5482	3,896.5482	0.2236		3,902.1384
Worker	2.4299	1.5074	21.0801	0.0607	6.0932	0.0493	6.1425	1.6163	0.0454	1.6617		6,042.5585	6,042.5585	0.1697		6,046.8000
Total	**2.8378**	**14.7106**	**24.5142**	**0.0971**	**7.0087**	**0.0741**	**7.0828**	**1.8799**	**0.0691**	**1.9490**		**9,939.1067**	**9,939.1067**	**0.3933**		**9,948.9384**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.7062	15.6156	16.3634	0.0269		0.8090	0.8090		0.7612	0.7612	0.0000	2,554.3336	2,554.3336	0.6120		2,569.6322
Total	**1.7062**	**15.6156**	**16.3634**	**0.0269**		**0.8090**	**0.8090**		**0.7612**	**0.7612**	**0.0000**	**2,554.3336**	**2,554.3336**	**0.6120**		**2,569.6322**

3.5 Building Construction - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.4079	13.2032	3.4341	0.0364	0.9155	0.0248	0.9404	0.2636	0.0237	0.2873		3,896.5482	3,896.5482	0.2236		3,902.1384
Worker	2.4299	1.5074	21.0801	0.0607	6.0932	0.0493	6.1425	1.6163	0.0454	1.6617		6,042.5585	6,042.5585	0.1697		6,046.8000
Total	**2.8378**	**14.7106**	**24.5142**	**0.0971**	**7.0087**	**0.0741**	**7.0828**	**1.8799**	**0.0691**	**1.9490**		**9,939.1067**	**9,939.1067**	**0.3933**		**9,948.9384**

3.5 Building Construction - 2023

Unmitigated Construction On-Site

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

3.5 Building Construction - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.3027	10.0181	3.1014	0.0352	0.9156	0.0116	0.9271	0.2636	0.0111	0.2747		3,773.8762	3,773.8762	0.1982		3,778.8300
Worker	2.2780	1.3628	19.4002	0.0584	6.0932	0.0479	6.1411	1.6163	0.0441	1.6604		5,821.4028	5,821.4028	0.1529		5,825.2254
Total	**2.5807**	**11.3809**	**22.5017**	**0.0936**	**7.0088**	**0.0595**	**7.0682**	**1.8799**	**0.0552**	**1.9350**		**9,595.2790**	**9,595.2790**	**0.3511**		**9,604.0554**

Mitigated Construction On-Site

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

3.5 Building Construction - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.3027	10.0181	3.1014	0.0352	0.9156	0.0116	0.9271	0.2636	0.0111	0.2747		3,773.8762	3,773.8762	0.1982		3,778.8300
Worker	2.2780	1.3628	19.4002	0.0584	6.0932	0.0479	6.1411	1.6163	0.0441	1.6604		5,821.4028	5,821.4028	0.1529		5,825.2254
Total	**2.5807**	**11.3809**	**22.5017**	**0.0936**	**7.0088**	**0.0595**	**7.0682**	**1.8799**	**0.0552**	**1.9350**		**9,595.2790**	**9,595.2790**	**0.3511**		**9,604.0554**

3.6 Paving - 2023

Unmitigated Construction On-Site

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

3.6 Paving - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0427	0.0255	0.3633	1.0900e-003	0.1141	9.0000e-004	0.1150	0.0303	8.3000e-004	0.0311		109.0150	109.0150	2.8600e-003		109.0866
Total	**0.0427**	**0.0255**	**0.3633**	**1.0900e-003**	**0.1141**	**9.0000e-004**	**0.1150**	**0.0303**	**8.3000e-004**	**0.0311**		**109.0150**	**109.0150**	**2.8600e-003**		**109.0866**

Mitigated Construction On-Site

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

3.6 Paving - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0427	0.0255	0.3633	1.0900e-003	0.1141	9.0000e-004	0.1150	0.0303	8.3000e-004	0.0311		109.0150	109.0150	2.8600e-003		109.0866
Total	**0.0427**	**0.0255**	**0.3633**	**1.0900e-003**	**0.1141**	**9.0000e-004**	**0.1150**	**0.0303**	**8.3000e-004**	**0.0311**		**109.0150**	**109.0150**	**2.8600e-003**		**109.0866**

3.6 Paving - 2024

Unmitigated Construction On-Site

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

3.6 Paving - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0403	0.0233	0.3384	1.0600e-003	0.1141	8.8000e-004	0.1150	0.0303	8.1000e-004	0.0311		105.6336	105.6336	2.6300e-003		105.6992
Total	**0.0403**	**0.0233**	**0.3384**	**1.0600e-003**	**0.1141**	**8.8000e-004**	**0.1150**	**0.0303**	**8.1000e-004**	**0.0311**		**105.6336**	**105.6336**	**2.6300e-003**		**105.6992**

Mitigated Construction On-Site

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

3.6 Paving - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0403	0.0233	0.3384	1.0600e-003	0.1141	8.8000e-004	0.1150	0.0303	8.1000e-004	0.0311		105.6336	105.6336	2.6300e-003		105.6992
Total	**0.0403**	**0.0233**	**0.3384**	**1.0600e-003**	**0.1141**	**8.8000e-004**	**0.1150**	**0.0303**	**8.1000e-004**	**0.0311**		**105.6336**	**105.6336**	**2.6300e-003**		**105.6992**

3.7 Architectural Coating - 2024

Unmitigated Construction On-Site

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

3.7 Architectural Coating - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.4296	0.2481	3.6098	0.0113	1.2171	9.4300e-003	1.2266	0.3229	8.6800e-003	0.3315		1,126.7583	1,126.7583	0.0280		1,127.4583
Total	**0.4296**	**0.2481**	**3.6098**	**0.0113**	**1.2171**	**9.4300e-003**	**1.2266**	**0.3229**	**8.6800e-003**	**0.3315**		**1,126.7583**	**1,126.7583**	**0.0280**		**1,127.4583**

Mitigated Construction On-Site

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

3.7 Architectural Coating - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.4296	0.2481	3.6098	0.0113	1.2171	9.4300e-003	1.2266	0.3229	8.6800e-003	0.3315		1,126.7583	1,126.7583	0.0280		1,127.4583
Total	**0.4296**	**0.2481**	**3.6098**	**0.0113**	**1.2171**	**9.4300e-003**	**1.2266**	**0.3229**	**8.6800e-003**	**0.3315**		**1,126.7583**	**1,126.7583**	**0.0280**		**1,127.4583**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	9.8489	45.4304	114.8495	0.4917	45.9592	0.3360	46.2951	12.2950	0.3119	12.6070		50,306.6034	50,306.6034	2.1807		50,361.1208
Unmitigated	9.8489	45.4304	114.8495	0.4917	45.9592	0.3360	46.2951	12.2950	0.3119	12.6070		50,306.6034	50,306.6034	2.1807		50,361.1208

4.2 Trip Summary Information

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

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments Low Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3
Apartments Mid Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3
General Office Building	16.60	8.40	6.90	33.00	48.00	19.00	77	19	4
High Turnover (Sit Down	16.60	8.40	6.90	8.50	72.50	19.00	37	20	43
Hotel	16.60	8.40	6.90	19.40	61.60	19.00	58	38	4
Quality Restaurant	16.60	8.40	6.90	12.00	69.00	19.00	38	18	44
Regional Shopping Center	16.60	8.40	6.90	16.30	64.70	19.00	54	35	11

4.4 Fleet Mix

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

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387
NaturalGas Unmitigated	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Apartments Low Rise	1119.16	0.0121	0.1031	0.0439	6.6000e-004		8.3400e-003	8.3400e-003		8.3400e-003	8.3400e-003		131.6662	131.6662	2.5200e-003	2.4100e-003	132.4486
Apartments Mid Rise	35784.3	0.3859	3.2978	1.4033	0.0211		0.2666	0.2666		0.2666	0.2666		4,209.9164	4,209.9164	0.0807	0.0772	4,234.9339
General Office Building	1283.42	0.0138	0.1258	0.1057	7.5000e-004		9.5600e-003	9.5600e-003		9.5600e-003	9.5600e-003		150.9911	150.9911	2.8900e-003	2.7700e-003	151.8884
High Turnover (Sit Down Restaurant)	22759.9	0.2455	2.2314	1.8743	0.0134		0.1696	0.1696		0.1696	0.1696		2,677.6342	2,677.6342	0.0513	0.0491	2,693.5460
Hotel	4769.72	0.0514	0.4676	0.3928	2.8100e-003		0.0355	0.0355		0.0355	0.0355		561.1436	561.1436	0.0108	0.0103	564.4782
Quality Restaurant	5057.75	0.0545	0.4959	0.4165	2.9800e-003		0.0377	0.0377		0.0377	0.0377		595.0298	595.0298	0.0114	0.0109	598.5658
Regional Shopping Center	251.616	2.7100e-003	0.0247	0.0207	1.5000e-004		1.8700e-003	1.8700e-003		1.8700e-003	1.8700e-003		29.6019	29.6019	5.7000e-004	5.4000e-004	29.7778
Total		**0.7660**	**6.7463**	**4.2573**	**0.0418**		**0.5292**	**0.5292**		**0.5292**	**0.5292**		**8,355.9832**	**8,355.9832**	**0.1602**	**0.1532**	**8,405.6387**

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Apartments Low Rise	1.11916	0.0121	0.1031	0.0439	6.6000e-004		8.3400e-003	8.3400e-003		8.3400e-003	8.3400e-003		131.6662	131.6662	2.5200e-003	2.4100e-003	132.4486
Apartments Mid Rise	35.7843	0.3859	3.2978	1.4033	0.0211		0.2666	0.2666		0.2666	0.2666		4,209.9164	4,209.9164	0.0807	0.0772	4,234.9339
General Office Building	1.28342	0.0138	0.1258	0.1057	7.5000e-004		9.5600e-003	9.5600e-003		9.5600e-003	9.5600e-003		150.9911	150.9911	2.8900e-003	2.7700e-003	151.8884
High Turnover (Sit Down Restaurant)	22.7599	0.2455	2.2314	1.8743	0.0134		0.1696	0.1696		0.1696	0.1696		2,677.6342	2,677.6342	0.0513	0.0491	2,693.5460
Hotel	4.76972	0.0514	0.4676	0.3928	2.8100e-003		0.0355	0.0355		0.0355	0.0355		561.1436	561.1436	0.0108	0.0103	564.4782
Quality Restaurant	5.05775	0.0545	0.4959	0.4165	2.9800e-003		0.0377	0.0377		0.0377	0.0377		595.0298	595.0298	0.0114	0.0109	598.5658
Regional Shopping Center	0.251616	2.7100e-003	0.0247	0.0207	1.5000e-004		1.8700e-003	1.8700e-003		1.8700e-003	1.8700e-003		29.6019	29.6019	5.7000e-004	5.4000e-004	29.7778
Total		**0.7660**	**6.7463**	**4.2573**	**0.0418**		**0.5292**	**0.5292**		**0.5292**	**0.5292**		**8,355.9832**	**8,355.9832**	**0.1602**	**0.1532**	**8,405.6387**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192
Unmitigated	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	2.2670					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	24.1085					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	1.6500	14.1000	6.0000	0.0900		1.1400	1.1400		1.1400	1.1400	0.0000	18,000.0000	18,000.0000	0.3450	0.3300	18,106.9650
Landscaping	2.4766	0.9496	82.4430	4.3600e-003		0.4574	0.4574		0.4574	0.4574		148.5950	148.5950	0.1424		152.1542
Total	**30.5020**	**15.0496**	**88.4430**	**0.0944**		**1.5974**	**1.5974**		**1.5974**	**1.5974**	**0.0000**	**18,148.5950**	**18,148.5950**	**0.4874**	**0.3300**	**18,259.1192**

6.2 Area by SubCategory

Mitigated

SubCategory	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
	lb/day										lb/day					
Architectural Coating	2.2670					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	24.1085					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	1.6500	14.1000	6.0000	0.0900		1.1400	1.1400		1.1400	1.1400	0.0000	18,000.0000	18,000.0000	0.3450	0.3300	18,106.9650
Landscaping	2.4766	0.9496	82.4430	4.3600e-003		0.4574	0.4574		0.4574	0.4574		148.5950	148.5950	0.1424		152.1542
Total	**30.5020**	**15.0496**	**88.4430**	**0.0944**		**1.5974**	**1.5974**		**1.5974**	**1.5974**	**0.0000**	**18,148.5950**	**18,148.5950**	**0.4874**	**0.3300**	**18,259.1192**

7.0 Water Detail

7.1 Mitigation Measures Water

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

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

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

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

Boilers

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

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

Village South Specific Plan (Proposed)

Los Angeles-South Coast County, Winter

1.0 Project Characteristics

1.1 Land Usage

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

1.2 Other Project Characteristics

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

1.3 User Entered Comments & Non-Default Data

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

Project Characteristics - Consistent with the DEIR's model.

Land Use - See SWAPE comment regarding residential and retail land uses.

Construction Phase - See SWAPE comment regarding individual construction phase lengths.

Demolition - Consistent with the DEIR's model. See SWAPE comment regarding demolition.

Vehicle Trips - Saturday trips consistent with the DEIR's model. See SWAPE comment regarding weekday and Sunday trips.

Woodstoves - Woodstoves and wood-burning fireplaces consistent with the DEIR's model. See SWAPE comment regarding gas fireplaces.

Energy Use -

Construction Off-road Equipment Mitigation - See SWAPE comment on construction-related mitigation.

Area Mitigation - See SWAPE comment regarding operational mitigation measures.

Water Mitigation - See SWAPE comment regarding operational mitigation measures.

Trips and VMT - Local hire provision

Table Name	Column Name	Default Value	New Value
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	NumberWood	1.25	0.00
tblFireplaces	NumberWood	48.75	0.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblVehicleTrips	ST_TR	7.16	6.17
tblVehicleTrips	ST_TR	6.39	3.87
tblVehicleTrips	ST_TR	2.46	1.39
tblVehicleTrips	ST_TR	158.37	79.82

tblVehicleTrips	ST_TR	8.19	3.75
tblVehicleTrips	ST_TR	94.36	63.99
tblVehicleTrips	ST_TR	49.97	10.74
tblVehicleTrips	SU_TR	6.07	6.16
tblVehicleTrips	SU_TR	5.86	4.18
tblVehicleTrips	SU_TR	1.05	0.69
tblVehicleTrips	SU_TR	131.84	78.27
tblVehicleTrips	SU_TR	5.95	3.20
tblVehicleTrips	SU_TR	72.16	57.65
tblVehicleTrips	SU_TR	25.24	6.39
tblVehicleTrips	WD_TR	6.59	5.83
tblVehicleTrips	WD_TR	6.65	4.13
tblVehicleTrips	WD_TR	11.03	6.41
tblVehicleTrips	WD_TR	127.15	65.80
tblVehicleTrips	WD_TR	8.17	3.84
tblVehicleTrips	WD_TR	89.95	62.64
tblVehicleTrips	WD_TR	42.70	9.43
tblWoodstoves	NumberCatalytic	1.25	0.00
tblWoodstoves	NumberCatalytic	48.75	0.00
tblWoodstoves	NumberNoncatalytic	1.25	0.00
tblWoodstoves	NumberNoncatalytic	48.75	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00

2.0 Emissions Summary

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	4.2621	46.4460	31.4068	0.0635	18.2032	2.0456	20.2488	9.9670	1.8820	11.8490	0.0000	6,154.3377	6,154.3377	1.9472	0.0000	6,203.0186
2022	4.7966	38.8851	39.6338	0.1195	8.8255	1.6361	10.4616	3.6369	1.5052	5.1421	0.0000	12,035.3440	12,035.3440	1.9482	0.0000	12,060.6013
2023	4.3939	25.8648	37.5031	0.1162	7.0088	0.7598	7.7685	1.8799	0.7142	2.5940	0.0000	11,710.4080	11,710.4080	0.9617	0.0000	11,734.4497
2024	237.0656	9.5503	14.9372	0.0238	1.2171	0.4694	1.2875	0.3229	0.4319	0.4621	0.0000	2,307.0517	2,307.0517	0.7164	0.0000	2,324.9627
Maximum	**237.0656**	**46.4460**	**39.6338**	**0.1195**	**18.2032**	**2.0456**	**20.2488**	**9.9670**	**1.8820**	**11.8490**	**0.0000**	**12,035.3440**	**12,035.3440**	**1.9482**	**0.0000**	**12,060.6013**

2.1 Overall Construction (Maximum Daily Emission)

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	4.2621	46.4460	31.4068	0.0635	18.2032	2.0456	20.2488	9.9670	1.8820	11.8490	0.0000	6,154.3377	6,154.3377	1.9472	0.0000	6,203.0186
2022	4.7966	38.8851	39.6338	0.1195	8.8255	1.6361	10.4616	3.6369	1.5052	5.1421	0.0000	12,035.3440	12,035.3440	1.9482	0.0000	12,060.6013
2023	4.3939	25.8648	37.5031	0.1162	7.0088	0.7598	7.7685	1.8799	0.7142	2.5940	0.0000	11,710.4080	11,710.4080	0.9617	0.0000	11,734.4497
2024	237.0656	9.5503	14.9372	0.0238	1.2171	0.4694	1.2875	0.3229	0.4319	0.4621	0.0000	2,307.0517	2,307.0517	0.7164	0.0000	2,324.9627
Maximum	**237.0656**	**46.4460**	**39.6338**	**0.1195**	**18.2032**	**2.0456**	**20.2488**	**9.9670**	**1.8820**	**11.8490**	**0.0000**	**12,035.3440**	**12,035.3440**	**1.9482**	**0.0000**	**12,060.6013**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	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**

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192
Energy	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387
Mobile	9.5233	45.9914	110.0422	0.4681	45.9592	0.3373	46.2965	12.2950	0.3132	12.6083		47,917.8005	47,917.8005	2.1953		47,972.6839
Total	**40.7912**	**67.7872**	**202.7424**	**0.6043**	**45.9592**	**2.4640**	**48.4231**	**12.2950**	**2.4399**	**14.7349**	**0.0000**	**74,422.3787**	**74,422.3787**	**2.8429**	**0.4832**	**74,637.4417**

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192
Energy	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387
Mobile	9.5233	45.9914	110.0422	0.4681	45.9592	0.3373	46.2965	12.2950	0.3132	12.6083		47,917.8005	47,917.8005	2.1953		47,972.6839
Total	**40.7912**	**67.7872**	**202.7424**	**0.6043**	**45.9592**	**2.4640**	**48.4231**	**12.2950**	**2.4399**	**14.7349**	**0.0000**	**74,422.3787**	**74,422.3787**	**2.8429**	**0.4832**	**74,637.4417**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

3.0 Construction Detail

Construction Phase

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

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 112.5

Acres of Paving: 0

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

OffRoad Equipment

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

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

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	6	15.00	0.00	458.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	7	18.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	801.00	143.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	160.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Demolition - 2021

Unmitigated Construction On-Site

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

3.2 Demolition - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.1304	4.1454	1.0182	0.0117	0.2669	0.0128	0.2797	0.0732	0.0122	0.0854		1,269.8555	1,269.8555	0.0908		1,272.1252
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0532	0.0346	0.3963	1.1100e-003	0.1141	9.5000e-004	0.1151	0.0303	8.8000e-004	0.0311		110.4707	110.4707	3.3300e-003		110.5539
Total	**0.1835**	**4.1800**	**1.4144**	**0.0128**	**0.3810**	**0.0137**	**0.3948**	**0.1034**	**0.0131**	**0.1165**		**1,380.3262**	**1,380.3262**	**0.0941**		**1,382.6791**

Mitigated Construction On-Site

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

3.2 Demolition - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.1304	4.1454	1.0182	0.0117	0.2669	0.0128	0.2797	0.0732	0.0122	0.0854		1,269.8555	1,269.8555	0.0908		1,272.1252
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0532	0.0346	0.3963	1.1100e-003	0.1141	9.5000e-004	0.1151	0.0303	8.8000e-004	0.0311		110.4707	110.4707	3.3300e-003		110.5539
Total	**0.1835**	**4.1800**	**1.4144**	**0.0128**	**0.3810**	**0.0137**	**0.3948**	**0.1034**	**0.0131**	**0.1165**		**1,380.3262**	**1,380.3262**	**0.0941**		**1,382.6791**

3.3 Site Preparation - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307			0.0000			0.0000
Off-Road	3.8882	40.4971	21.1543	0.0380		2.0445	2.0445		1.8809	1.8809		3,685.6569	3,685.6569	1.1920		3,715.4573
Total	**3.8882**	**40.4971**	**21.1543**	**0.0380**	**18.0663**	**2.0445**	**20.1107**	**9.9307**	**1.8809**	**11.8116**		**3,685.6569**	**3,685.6569**	**1.1920**		**3,715.4573**

3.3 Site Preparation - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0638	0.0415	0.4755	1.3300e-003	0.1369	1.1400e-003	0.1381	0.0363	1.0500e-003	0.0374		132.5649	132.5649	3.9900e-003		132.6646
Total	**0.0638**	**0.0415**	**0.4755**	**1.3300e-003**	**0.1369**	**1.1400e-003**	**0.1381**	**0.0363**	**1.0500e-003**	**0.0374**		**132.5649**	**132.5649**	**3.9900e-003**		**132.6646**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307			0.0000			0.0000
Off-Road	3.8882	40.4971	21.1543	0.0380		2.0445	2.0445		1.8809	1.8809	0.0000	3,685.6569	3,685.6569	1.1920		3,715.4573
Total	**3.8882**	**40.4971**	**21.1543**	**0.0380**	**18.0663**	**2.0445**	**20.1107**	**9.9307**	**1.8809**	**11.8116**	**0.0000**	**3,685.6569**	**3,685.6569**	**1.1920**		**3,715.4573**

3.3 Site Preparation - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0638	0.0415	0.4755	1.3300e-003	0.1369	1.1400e-003	0.1381	0.0363	1.0500e-003	0.0374		132.5649	132.5649	3.9900e-003		132.6646
Total	**0.0638**	**0.0415**	**0.4755**	**1.3300e-003**	**0.1369**	**1.1400e-003**	**0.1381**	**0.0363**	**1.0500e-003**	**0.0374**		**132.5649**	**132.5649**	**3.9900e-003**		**132.6646**

3.4 Grading - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	4.1912	46.3998	30.8785	0.0620		1.9853	1.9853		1.8265	1.8265		6,007.0434	6,007.0434	1.9428		6,055.6134
Total	**4.1912**	**46.3998**	**30.8785**	**0.0620**	**8.6733**	**1.9853**	**10.6587**	**3.5965**	**1.8265**	**5.4230**		**6,007.0434**	**6,007.0434**	**1.9428**		**6,055.6134**

3.4 Grading - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0709	0.0462	0.5284	1.4800e-003	0.1521	1.2700e-003	0.1534	0.0404	1.1700e-003	0.0415		147.2943	147.2943	4.4300e-003		147.4051
Total	**0.0709**	**0.0462**	**0.5284**	**1.4800e-003**	**0.1521**	**1.2700e-003**	**0.1534**	**0.0404**	**1.1700e-003**	**0.0415**		**147.2943**	**147.2943**	**4.4300e-003**		**147.4051**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	4.1912	46.3998	30.8785	0.0620		1.9853	1.9853		1.8265	1.8265	0.0000	6,007.0434	6,007.0434	1.9428		6,055.6134
Total	**4.1912**	**46.3998**	**30.8785**	**0.0620**	**8.6733**	**1.9853**	**10.6587**	**3.5965**	**1.8265**	**5.4230**	**0.0000**	**6,007.0434**	**6,007.0434**	**1.9428**		**6,055.6134**

3.4 Grading - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0709	0.0462	0.5284	1.4800e-003	0.1521	1.2700e-003	0.1534	0.0404	1.1700e-003	0.0415		147.2943	147.2943	4.4300e-003		147.4051
Total	**0.0709**	**0.0462**	**0.5284**	**1.4800e-003**	**0.1521**	**1.2700e-003**	**0.1534**	**0.0404**	**1.1700e-003**	**0.0415**		**147.2943**	**147.2943**	**4.4300e-003**		**147.4051**

3.4 Grading - 2022

Unmitigated Construction On-Site

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

3.4 Grading - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0665	0.0416	0.4861	1.4300e-003	0.1521	1.2300e-003	0.1534	0.0404	1.1300e-003	0.0415		142.1207	142.1207	4.0000e-003		142.2207
Total	**0.0665**	**0.0416**	**0.4861**	**1.4300e-003**	**0.1521**	**1.2300e-003**	**0.1534**	**0.0404**	**1.1300e-003**	**0.0415**		**142.1207**	**142.1207**	**4.0000e-003**		**142.2207**

Mitigated Construction On-Site

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

3.4 Grading - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0665	0.0416	0.4861	1.4300e-003	0.1521	1.2300e-003	0.1534	0.0404	1.1300e-003	0.0415		142.1207	142.1207	4.0000e-003		142.2207
Total	**0.0665**	**0.0416**	**0.4861**	**1.4300e-003**	**0.1521**	**1.2300e-003**	**0.1534**	**0.0404**	**1.1300e-003**	**0.0415**		**142.1207**	**142.1207**	**4.0000e-003**		**142.2207**

3.5 Building Construction - 2022

Unmitigated Construction On-Site

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

3.5 Building Construction - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.4284	13.1673	3.8005	0.0354	0.9155	0.0256	0.9412	0.2636	0.0245	0.2881		3,789.0750	3,789.0750	0.2381		3,795.0283
Worker	2.6620	1.6677	19.4699	0.0571	6.0932	0.0493	6.1425	1.6163	0.0454	1.6617		5,691.9354	5,691.9354	0.1602		5,695.9408
Total	**3.0904**	**14.8350**	**23.2704**	**0.0926**	**7.0087**	**0.0749**	**7.0836**	**1.8799**	**0.0699**	**1.9498**		**9,481.0104**	**9,481.0104**	**0.3984**		**9,490.9691**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.7062	15.6156	16.3634	0.0269		0.8090	0.8090		0.7612	0.7612	0.0000	2,554.3336	2,554.3336	0.6120		2,569.6322
Total	**1.7062**	**15.6156**	**16.3634**	**0.0269**		**0.8090**	**0.8090**		**0.7612**	**0.7612**	**0.0000**	**2,554.3336**	**2,554.3336**	**0.6120**		**2,569.6322**

3.5 Building Construction - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.4284	13.1673	3.8005	0.0354	0.9155	0.0256	0.9412	0.2636	0.0245	0.2881		3,789.0750	3,789.0750	0.2381		3,795.0283
Worker	2.6620	1.6677	19.4699	0.0571	6.0932	0.0493	6.1425	1.6163	0.0454	1.6617		5,691.9354	5,691.9354	0.1602		5,695.9408
Total	**3.0904**	**14.8350**	**23.2704**	**0.0926**	**7.0087**	**0.0749**	**7.0836**	**1.8799**	**0.0699**	**1.9498**		**9,481.0104**	**9,481.0104**	**0.3984**		**9,490.9691**

3.5 Building Construction - 2023

Unmitigated Construction On-Site

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

3.5 Building Construction - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.3183	9.9726	3.3771	0.0343	0.9156	0.0122	0.9277	0.2636	0.0116	0.2752		3,671.4007	3,671.4007	0.2096		3,676.6417
Worker	2.5029	1.5073	17.8820	0.0550	6.0932	0.0479	6.1411	1.6163	0.0441	1.6604		5,483.7974	5,483.7974	0.1442		5,487.4020
Total	**2.8211**	**11.4799**	**21.2591**	**0.0893**	**7.0088**	**0.0601**	**7.0688**	**1.8799**	**0.0557**	**1.9356**		**9,155.1981**	**9,155.1981**	**0.3538**		**9,164.0437**

Mitigated Construction On-Site

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

3.5 Building Construction - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.3183	9.9726	3.3771	0.0343	0.9156	0.0122	0.9277	0.2636	0.0116	0.2752		3,671.4007	3,671.4007	0.2096		3,676.6417
Worker	2.5029	1.5073	17.8820	0.0550	6.0932	0.0479	6.1411	1.6163	0.0441	1.6604		5,483.7974	5,483.7974	0.1442		5,487.4020
Total	**2.8211**	**11.4799**	**21.2591**	**0.0893**	**7.0088**	**0.0601**	**7.0688**	**1.8799**	**0.0557**	**1.9356**		**9,155.1981**	**9,155.1981**	**0.3538**		**9,164.0437**

3.6 Paving - 2023

Unmitigated Construction On-Site

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

3.6 Paving - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0469	0.0282	0.3349	1.0300e-003	0.1141	9.0000e-004	0.1150	0.0303	8.3000e-004	0.0311		102.6928	102.6928	2.7000e-003		102.7603
Total	**0.0469**	**0.0282**	**0.3349**	**1.0300e-003**	**0.1141**	**9.0000e-004**	**0.1150**	**0.0303**	**8.3000e-004**	**0.0311**		**102.6928**	**102.6928**	**2.7000e-003**		**102.7603**

Mitigated Construction On-Site

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

3.6 Paving - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0469	0.0282	0.3349	1.0300e-003	0.1141	9.0000e-004	0.1150	0.0303	8.3000e-004	0.0311		102.6928	102.6928	2.7000e-003		102.7603
Total	**0.0469**	**0.0282**	**0.3349**	**1.0300e-003**	**0.1141**	**9.0000e-004**	**0.1150**	**0.0303**	**8.3000e-004**	**0.0311**		**102.6928**	**102.6928**	**2.7000e-003**		**102.7603**

3.6 Paving - 2024

Unmitigated Construction On-Site

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

3.6 Paving - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0444	0.0257	0.3114	1.0000e-003	0.1141	8.8000e-004	0.1150	0.0303	8.1000e-004	0.0311		99.5045	99.5045	2.4700e-003		99.5663
Total	**0.0444**	**0.0257**	**0.3114**	**1.0000e-003**	**0.1141**	**8.8000e-004**	**0.1150**	**0.0303**	**8.1000e-004**	**0.0311**		**99.5045**	**99.5045**	**2.4700e-003**		**99.5663**

Mitigated Construction On-Site

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

3.6 Paving - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0444	0.0257	0.3114	1.0000e-003	0.1141	8.8000e-004	0.1150	0.0303	8.1000e-004	0.0311		99.5045	99.5045	2.4700e-003		99.5663
Total	**0.0444**	**0.0257**	**0.3114**	**1.0000e-003**	**0.1141**	**8.8000e-004**	**0.1150**	**0.0303**	**8.1000e-004**	**0.0311**		**99.5045**	**99.5045**	**2.4700e-003**		**99.5663**

3.7 Architectural Coating - 2024

Unmitigated Construction On-Site

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

3.7 Architectural Coating - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.4734	0.2743	3.3220	0.0107	1.2171	9.4300e-003	1.2266	0.3229	8.6800e-003	0.3315		1,061.3818	1,061.3818	0.0264		1,062.0410
Total	**0.4734**	**0.2743**	**3.3220**	**0.0107**	**1.2171**	**9.4300e-003**	**1.2266**	**0.3229**	**8.6800e-003**	**0.3315**		**1,061.3818**	**1,061.3818**	**0.0264**		**1,062.0410**

Mitigated Construction On-Site

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

3.7 Architectural Coating - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.4734	0.2743	3.3220	0.0107	1.2171	9.4300e-003	1.2266	0.3229	8.6800e-003	0.3315		1,061.3818	1,061.3818	0.0264		1,062.0410
Total	**0.4734**	**0.2743**	**3.3220**	**0.0107**	**1.2171**	**9.4300e-003**	**1.2266**	**0.3229**	**8.6800e-003**	**0.3315**		**1,061.3818**	**1,061.3818**	**0.0264**		**1,062.0410**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	9.5233	45.9914	110.0422	0.4681	45.9592	0.3373	46.2965	12.2950	0.3132	12.6083		47,917.8005	47,917.8005	2.1953		47,972.6839
Unmitigated	9.5233	45.9914	110.0422	0.4681	45.9592	0.3373	46.2965	12.2950	0.3132	12.6083		47,917.8005	47,917.8005	2.1953		47,972.6839

4.2 Trip Summary Information

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

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments Low Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3
Apartments Mid Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3
General Office Building	16.60	8.40	6.90	33.00	48.00	19.00	77	19	4
High Turnover (Sit Down	16.60	8.40	6.90	8.50	72.50	19.00	37	20	43
Hotel	16.60	8.40	6.90	19.40	61.60	19.00	58	38	4
Quality Restaurant	16.60	8.40	6.90	12.00	69.00	19.00	38	18	44
Regional Shopping Center	16.60	8.40	6.90	16.30	64.70	19.00	54	35	11

4.4 Fleet Mix

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

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387
NaturalGas Unmitigated	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Apartments Low Rise	1119.16	0.0121	0.1031	0.0439	6.6000e-004		8.3400e-003	8.3400e-003		8.3400e-003	8.3400e-003		131.6662	131.6662	2.5200e-003	2.4100e-003	132.4486
Apartments Mid Rise	35784.3	0.3859	3.2978	1.4033	0.0211		0.2666	0.2666		0.2666	0.2666		4,209.9164	4,209.9164	0.0807	0.0772	4,234.9339
General Office Building	1283.42	0.0138	0.1258	0.1057	7.5000e-004		9.5600e-003	9.5600e-003		9.5600e-003	9.5600e-003		150.9911	150.9911	2.8900e-003	2.7700e-003	151.8884
High Turnover (Sit Down Restaurant)	22759.9	0.2455	2.2314	1.8743	0.0134		0.1696	0.1696		0.1696	0.1696		2,677.6342	2,677.6342	0.0513	0.0491	2,693.5460
Hotel	4769.72	0.0514	0.4676	0.3928	2.8100e-003		0.0355	0.0355		0.0355	0.0355		561.1436	561.1436	0.0108	0.0103	564.4782
Quality Restaurant	5057.75	0.0545	0.4959	0.4165	2.9800e-003		0.0377	0.0377		0.0377	0.0377		595.0298	595.0298	0.0114	0.0109	598.5658
Regional Shopping Center	251.616	2.7100e-003	0.0247	0.0207	1.5000e-004		1.8700e-003	1.8700e-003		1.8700e-003	1.8700e-003		29.6019	29.6019	5.7000e-004	5.4000e-004	29.7778
Total		**0.7660**	**6.7463**	**4.2573**	**0.0418**		**0.5292**	**0.5292**		**0.5292**	**0.5292**		**8,355.9832**	**8,355.9832**	**0.1602**	**0.1532**	**8,405.6387**

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Apartments Low Rise	1.11916	0.0121	0.1031	0.0439	6.6000e-004		8.3400e-003	8.3400e-003		8.3400e-003	8.3400e-003		131.6662	131.6662	2.5200e-003	2.4100e-003	132.4486
Apartments Mid Rise	35.7843	0.3859	3.2978	1.4033	0.0211		0.2666	0.2666		0.2666	0.2666		4,209.9164	4,209.9164	0.0807	0.0772	4,234.9339
General Office Building	1.28342	0.0138	0.1258	0.1057	7.5000e-004		9.5600e-003	9.5600e-003		9.5600e-003	9.5600e-003		150.9911	150.9911	2.8900e-003	2.7700e-003	151.8884
High Turnover (Sit Down Restaurant)	22.7599	0.2455	2.2314	1.8743	0.0134		0.1696	0.1696		0.1696	0.1696		2,677.6342	2,677.6342	0.0513	0.0491	2,693.5460
Hotel	4.76972	0.0514	0.4676	0.3928	2.8100e-003		0.0355	0.0355		0.0355	0.0355		561.1436	561.1436	0.0108	0.0103	564.4782
Quality Restaurant	5.05775	0.0545	0.4959	0.4165	2.9800e-003		0.0377	0.0377		0.0377	0.0377		595.0298	595.0298	0.0114	0.0109	598.5658
Regional Shopping Center	0.251616	2.7100e-003	0.0247	0.0207	1.5000e-004		1.8700e-003	1.8700e-003		1.8700e-003	1.8700e-003		29.6019	29.6019	5.7000e-004	5.4000e-004	29.7778
Total		**0.7660**	**6.7463**	**4.2573**	**0.0418**		**0.5292**	**0.5292**		**0.5292**	**0.5292**		**8,355.9832**	**8,355.9832**	**0.1602**	**0.1532**	**8,405.6387**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192
Unmitigated	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	2.2670					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	24.1085					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	1.6500	14.1000	6.0000	0.0900		1.1400	1.1400		1.1400	1.1400	0.0000	18,000.0000	18,000.0000	0.3450	0.3300	18,106.9650
Landscaping	2.4766	0.9496	82.4430	4.3600e-003		0.4574	0.4574		0.4574	0.4574		148.5950	148.5950	0.1424		152.1542
Total	**30.5020**	**15.0496**	**88.4430**	**0.0944**		**1.5974**	**1.5974**		**1.5974**	**1.5974**	**0.0000**	**18,148.5950**	**18,148.5950**	**0.4874**	**0.3300**	**18,259.1192**

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	2.2670					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	24.1085					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	1.6500	14.1000	6.0000	0.0900		1.1400	1.1400		1.1400	1.1400	0.0000	18,000.0000	18,000.0000	0.3450	0.3300	18,106.9650
Landscaping	2.4766	0.9496	82.4430	4.3600e-003		0.4574	0.4574		0.4574	0.4574		148.5950	148.5950	0.1424		152.1542
Total	**30.5020**	**15.0496**	**88.4430**	**0.0944**		**1.5974**	**1.5974**		**1.5974**	**1.5974**	**0.0000**	**18,148.5950**	**18,148.5950**	**0.4874**	**0.3300**	**18,259.1192**

7.0 Water Detail

7.1 Mitigation Measures Water

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

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

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

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

Boilers

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

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

Local Hire Provision Net Change	
Without Local Hire Provision	
Total Construction GHG Emissions (MT CO2e)	3,623
Amortized (MT CO2e/year)	120.77
With Local Hire Provision	
Total Construction GHG Emissions (MT CO2e)	3,024
Amortized (MT CO2e/year)	100.80
% Decrease in Construction-related GHG Emissions	***17%***

EXHIBIT B

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

SOIL WATER AIR PROTECTION ENTERPRISE
2656 29th Street, Suite 201
Santa Monica, California 90405
Attn: Paul Rosenfeld, Ph.D.
Mobil: (310) 795-2335
Office: (310) 452-5555
Fax: (310) 452-5550
Email: prosenfeld@swape.com

Paul Rosenfeld, Ph.D.

Chemical Fate and Transport & Air Dispersion Modeling

Principal Environmental Chemist

Risk Assessment & Remediation Specialist

Education

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

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

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

Professional Experience

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

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

Professional History:

Soil Water Air Protection Enterprise (SWAPE); 2003 to present; Principal and Founding Partner
UCLA School of Public Health; 2007 to 2011; Lecturer (Assistant Researcher)
UCLA School of Public Health; 2003 to 2006; Adjunct Professor
UCLA Environmental Science and Engineering Program; 2002-2004; Doctoral Intern Coordinator
UCLA Institute of the Environment, 2001-2002; Research Associate
Komex H_2O Science, 2001 to 2003; Senior Remediation Scientist
National Groundwater Association, 2002-2004; Lecturer
San Diego State University, 1999-2001; Adjunct Professor
Anteon Corp., San Diego, 2000-2001; Remediation Project Manager
Ogden (now Amec), San Diego, 2000-2000; Remediation Project Manager
Bechtel, San Diego, California, 1999 – 2000; Risk Assessor
King County, Seattle, 1996 – 1999; Scientist
James River Corp., Washington, 1995-96; Scientist
Big Creek Lumber, Davenport, California, 1995; Scientist
Plumas Corp., California and USFS, Tahoe 1993-1995; Scientist
Peace Corps and World Wildlife Fund, St. Kitts, West Indies, 1991-1993; Scientist

Publications:

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

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

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

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

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

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

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

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

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

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

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

Tam L. K.., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008). Methods For Collect Samples For Assessing Dioxins And Other Environmental Contaminants In Attic Dust: A Review. *Organohalogen Compounds*, 70, 000527-000530.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Presentations:

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

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

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

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

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

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

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

Rosenfeld, P. E. (October 15-18, 2007). The Repeated Trespass of Tritium-Contaminated Water Into A Surrounding Community Form Repeated Waste Spills From A Nuclear Power Plant. *The 23rd Annual International Conferences on Soils Sediment and Water*. Platform lecture conducted from University of Massachusetts, Amherst MA.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Teaching Experience:

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

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

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

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

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

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

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

Academic Grants Awarded:

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

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

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

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

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

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

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

Deposition and/or Trial Testimony:

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

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

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

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

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

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

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

In The Circuit Court Of The Twentieth Judicial Circuit, St Clair County, Illinois
Martha Custer et al., Plaintiff vs. Cerro Flow Products, Inc., Defendants
Case No.: No. 0i9-L-2295
Rosenfeld Deposition, 8-23-2017

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

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

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

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

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

In The Iowa District Court For Wapello County
Jerry Dovico, et al., Plaintiffs vs. Valley View Sine LLC, et al., Defendants
Law No,: LALA105144 - Division A
Rosenfeld Deposition, August 2015

In The Iowa District Court For Wapello County
Doug Pauls, et al.,, et al., Plaintiffs vs. Richard Warren, et al., Defendants
Law No,: LALA105144 - Division A
Rosenfeld Deposition, August 2015

In The Circuit Court of Ohio County, West Virginia
Robert Andrews, et al. v. Antero, et al.
Civil Action N0. 14-C-30000
Rosenfeld Deposition, June 2015

In The Third Judicial District County of Dona Ana, New Mexico
Betty Gonzalez, et al. Plaintiffs vs. Del Oro Dairy, Del Oro Real Estate LLC, Jerry Settles and Deward DeRuyter, Defendants
Rosenfeld Deposition: July 2015

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

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

In the United States District Court Western District of Oklahoma
Tommy McCarty, et al., Plaintiffs, v. Oklahoma City Landfill, LLC d/b/a Southeast Oklahoma City Landfill, et al. Defendants.
Case No. 5:12-cv-01152-C
Rosenfeld Deposition: July 2014

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

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

In the United States District Court of Southern District of Texas Galveston Division
Kyle Cannon, Eugene Donovan, Genaro Ramirez, Carol Sassler, and Harvey Walton, each Individually and on behalf of those similarly situated, *Plaintiffs,* vs. BP Products North America, Inc., *Defendant.*
Case 3:10-cv-00622
Rosenfeld Deposition: February 2012
Rosenfeld Trial: April 2013

In the Circuit Court of Baltimore County Maryland
Philip E. Cvach, II et al., *Plaintiffs* vs. Two Farms, Inc. d/b/a Royal Farms, Defendants
Case Number: 03-C-12-012487 OT
Rosenfeld Deposition: September 2013

EXHIBIT C

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

1640 5th St.., Suite 204 Santa
Santa Monica, California 90401
Tel: (949) 887-9013
Email: mhagemann@swape.com

Matthew F. Hagemann, P.G., C.Hg., QSD, QSP

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

Education:

M.S. Degree, Geology, California State University Los Angeles, Los Angeles, CA, 1984.
B.A. Degree, Geology, Humboldt State University, Arcata, CA, 1982.

Professional Certifications:

California Professional Geologist
California Certified Hydrogeologist
Qualified SWPPP Developer and Practitioner

Professional Experience:

Matt has 25 years of experience in environmental policy, assessment and remediation. He spent nine years with the U.S. EPA in the RCRA and Superfund programs and served as EPA's Senior Science Policy Advisor in the Western Regional Office where he identified emerging threats to groundwater from perchlorate and MTBE. While with EPA, Matt also served as a Senior Hydrogeologist in the oversight of the assessment of seven major military facilities undergoing base closure. He led numerous enforcement actions under provisions of the Resource Conservation and Recovery Act (RCRA) while also working with permit holders to improve hydrogeologic characterization and water quality monitoring.

Matt has worked closely with U.S. EPA legal counsel and the technical staff of several states in the application and enforcement of RCRA, Safe Drinking Water Act and Clean Water Act regulations. Matt has trained the technical staff in the States of California, Hawaii, Nevada, Arizona and the Territory of Guam in the conduct of investigations, groundwater fundamentals, and sampling techniques.

Positions Matt has held include:

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

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

Senior Regulatory and Litigation Support Analyst:

With SWAPE, Matt's responsibilities have included:

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

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

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

- Expert witness testimony in a case of oil production-related contamination in Mississippi.
- Lead author for a multi-volume remedial investigation report for an operating school in Los Angeles that met strict regulatory requirements and rigorous deadlines.

- Development of strategic approaches for cleanup of contaminated sites in consultation with clients and regulators.

Executive Director:

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

Hydrogeology:

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

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

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

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

- Received an EPA Bronze Medal for his contribution to the development of national guidance for the protection of drinking water.
- Managed the Sole Source Aquifer Program and protected the drinking water of two communities through designation under the Safe Drinking Water Act. He prepared geologic reports, conducted public hearings, and responded to public comments from residents who were very concerned about the impact of designation.

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

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

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

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

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

Policy:

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

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

Geology:

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

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

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

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

Teaching:

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

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

Matt taught physical geology (lecture and lab and introductory geology at Golden West College in Huntington Beach, California from 2010 to 2014.

Invited Testimony, Reports, Papers and Presentations:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Other Experience:

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

Letter O-4[1]

COMMENTER: Southwest Regional Council of Carpenters (SWRCC)

DATE: May 13, 2022

Comment O-4-1

The commenter states Southwest Carpenters is a labor union representing more than 50,000 union carpenters in six states and has a strong interest in well-ordered land use planning and addressing the environmental impacts of development projects. Individual members of the Southwest Carpenters live, work, and recreate in the City and surrounding communities and would be directly affected by the project's environmental impacts.

Response O-4-1

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. City of Thousand Oaks decision makers will consider all comments on the proposed project. No further response is necessary.

Comment O-4-2

The commenter incorporates by reference all comments raising issues regarding the EIR submitted prior to certification of the Draft EIR for the project and requests that the Lead Agency provide notice for any and all notices referring or related to the project issued under the CEQA. The commenter states CEQA requires agencies to mail such notices to any person who has filed a written request for them with the clerk of the agency's governing body.

Response O-4-2

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. City of Thousand Oaks decision makers will consider all comments on the proposed project. No further response is necessary.

Comment O-4-3

The commenter states the City should require the Applicant provide additional community benefits such as requiring local hire and use of a skilled and trained workforce to build the Project. The City should require the use of workers who have graduated from a Joint Labor Management apprenticeship training program approved by the State of California, or have at least as many hours of on-the-job experience in the applicable craft which would be required to graduate from such a state approved apprenticeship training program or who are registered apprentices in an apprenticeship training program approved by the State of California. Also, the City should consider utilizing skilled and trained workforce policies and requirements to benefit the local area economically and mitigate greenhouse gas, air quality and transportation impacts

Response O-4-3

The Draft EIR was developed in conformance with the requirements of the CEQA. "CEQA is intended to inform government decisionmakers and the public about the potential environmental effects of

[1] The Attachments included with Letter O-4, are included as Appendix C to the Final EIR

proposed activities and to prevent significant, avoidable environmental damage."[2] It is therefore, beyond the scope of the Draft EIR to dictate the educational or skill levels required to participate in the development of the proposed project.

The implementation of a local hire provision that requires a certain percentage of workers reside within a 10-mile radius of the project site could potentially reduce impacts related to air quality, greenhouse gas emissions, and transportation should mitigation be required to reduce the impacts to these areas. However, as detailed in Sections 4.2 *Air Quality*, 4.7 *Greenhouse Gas Emissions,* and 4.14 *Transportation,* the proposed project would result in less than significant environmental impacts associated with air quality, greenhouse gas emissions and transportation. Therefore, implementation of a skilled labor or local hire requirement to further reduce/mitigate impacts is not warranted. No revisions of the Draft EIR are needed to address this comment.

Comment O-4-4

The commenter states that the city should also require the project to be built to standards exceeding the current 2019 California Green Building Code to mitigate the Project's environmental impacts and to advance progress towards the State of California's environmental goals.

Response O-4-4

This comment does not specify which, if any, project impacts would be addressed by requiring the project to be built to standards exceeding 2019 California Building Code. As detailed in Section 4.7 G*reenhouse Gas Emissions*, the proposed project would result in less than significant environmental impacts associated with greenhouse gas emissions. Therefore, implementation of mitigation is not warranted. No revisions of the Draft EIR are needed to address this comment.

Comment O-4-5

The commenter states that CEQA has two basic purposes. First, CEQA is designed to inform decision makers and the public about the potential, significant environmental effects of a project. Second, CEQA directs public agencies to avoid or reduce environmental damage when possible by requiring alternatives or mitigation measures.

Response O-4-5

This comment describes existing law, but does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. City of Thousand Oaks decision makers will consider all comments on the proposed project. No further response is necessary.

Comment O-4-6

The commenter cites to CEQA case law about judicial standard of review and states that the EIR must present information so that the foreseeable impacts of pursuing the project can be understood and weighed, and the public must be given an adequate opportunity to comment on that presentation before the decision to go forward is made.

[2] Governor's Office of Planning and Research. 2022. *CEQA: The California Environmental Quality Act.* https://opr.ca.gov/ceqa/

Response O-4-6

This comment describes existing law, but does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. City of Thousand Oaks decision makers will consider all comments on the proposed project. No further response is necessary.

Comment O-4-7

The commenter states if significant new information was brought to the attention of an agency prior to certification, an agency is required to revise and recirculate that information as part of the environmental impact report.

Response O-4-7

This comment describes existing law, but does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. City of Thousand Oaks decision makers will consider all comments on the proposed project. No further response is necessary.

Comment O-4-8

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

Response O-4-8

The comment is noted. However, an EIR is required to identify and focus on the significant effects of a proposed project on the environment. First, it is speculative to assume that Covid 19 will still present a public health concern during project construction given the widespread availability of the vaccine and decrease in the number of cases. Second, any public health concern created by the Covid 19 pandemic are not project impacts. CEQA Guidelines Section 15360 and California Public Resources Code (PRC) Section 21060.5 define the environment as the "physical conditions which exist within the area which will be affected by a proposed project including land, air, water, minerals, flora, fauna, noise, [and] objects of historic or aesthetic significance." Impacts that are subject to review under CEQA must be related to a change to the physical environment (CEQA Guidelines Section 15358(b)). CEQA Guidelines Section 15126.2, provides that in reviewing and determining impacts of a project on the environment, the lead agency is required to "limit its examination to changes in the existing physical conditions." Thus, COVID 19 is not a physical condition as defined above and is outside the purview of CEQA. Finally, Project construction will be subject to, and will follow, all applicable state and local public health regulations and protocols. Thus, no revisions to the Draft EIR are required to address this comment.

Comment O-4-9

The commenter provides numerous project site design requests for COVID-19 procedures. The commenter states that the Agency should require that all construction workers undergo COVID-19 Training and Certification before being allowed to conduct construction activities at the Project Site

Response O-4-9

The comment is noted. The commenter is referred to Response O-4-8.

Comment O-4-10

The commenter suggests the Draft EIR concludes that project impacts to noise, transportation, housing, and hazards would be significant and unavoidable; and it fails to provide a feasibility analysis for mitigation measures that could conceivably reduce these impacts to less than significant levels. Without a feasibility analysis of more stringent mitigation measures, the Draft EIR fails as an informational document.

Response O-4-10

First, the commenter incorrectly states that the Draft EIR concluded that the project would result in significant and unavoidable impacts to noise, transportation, housing, and hazards. In fact, the only significant and unavoidable impacts found were related to construction noise. As detailed in Sections 4.11 *Population and Housing* and 4.14 *Transportation,* the proposed project would result in less than significant environmental impacts associated with housing and transportation. Regarding potentially significant hazard impacts, implementation of Mitigation Measures HAZ-1 through HAZ-5 would reduce impacts related to potential hazardous materials exposure to a less-than-significant level.

Finally, regarding construction noise impacts, the comment states that the Draft EIR could conceivably reduce the project's construction noise impacts to less than significant levels, but provides no suggestions, examples, or recommendations for additional more stringent mitigation measures. The Draft EIR identified significant and unavoidable impacts related to construction noise with mitigation. Detailed and project-specific mitigation, including the installation of temporary noise barriers was included in Mitigation Measure NOI-1 (see page 4.10-18 of the Draft EIR).

When it comes to reducing construction noise, temporary noise barriers are generally effective at substantially lessening construction noise levels when they are able to block the line-of-sight between the noise source and the receiver. However, as described in the Draft EIR at page 4.10-19, "implementation of Mitigation Measure NOI-1 would reduce construction noise levels by up to 11 dB through use of the temporary construction noise barrier." Nevertheless, a temporary construction noise barrier is not proposed for the nearby sensitive receptor daycare facility and the residences west of the project site on Foothill Drive that are elevated approximately 30 feet to 40 feet above the project site because a construction noise barrier would not be tall enough to block line of sight from the project construction equipment to these receivers. Even with the implementation of the barrier, when pile driving occurs, project construction-related noise increases in ambient noise levels would remain greater than 10 dB at the Westlake Villas residences to the south during the building construction phase and at the Windsor Terrace of Westlake Village convalescent home during the demolition, site preparation, grading, building construction, and paving phases of construction, as shown on Table 4.10 6 of the Draft EIR. In addition, the magnitude of the project's temporary construction noise levels relative to the ambient levels is such that even a maximally-effective noise barrier would not feasibly reduce project construction-related noise increases to below the 10 dB increase threshold during other, non-pile driving activities." The City is aware of no other feasible mitigation measures that would reduce the temporary construction impacts to less that significant. Therefore, construction noise impacts after mitigation were found to be significant and unavoidable, and the required findings under CEQA Guidelines, Section 15091 and a statement of overriding

considerations will be adopted pursuant to CEQA Guidelines, Section 15093 . No revisions to the Draft EIR are required to address this comment.

Comment O-4-11

The commenter states that the DEIR fails to support its findings with substantial evidence. When new information is brought to light showing that an impact previously discussed in the Draft EIR but found to be insignificant with or without mitigation in the DEIR's analysis has the potential for a significant environmental impact supported by substantial evidence, the EIR must consider and resolve the conflict in the evidence. The choice of any standards or thresholds of significance must be "based to the extent possible on scientific and factual data and an exercise of reasoned judgment based on substantial evidence.

Response O-4-11

The commenter does not provide any specific information as to any how the Draft EIR fails to support its findings with substantial evidence. This comment describes existing law, but does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. City of Thousand Oaks decision makers will consider all comments on the proposed project. No further response is necessary.

Comment O-4-12

The commenter states that the Draft EIR fails to support its findings on greenhouse gas impacts with substantial evidence. The Draft EIR concludes consistency with the SCAG's 2016-2040 statewide plans to reduce GHG emissions but does not identify consistency with the 2020-2045 plan (DEIR 4.7-17-24). However, the DEIR materials includes an Appendix B titled "Air Quality Monitoring," wherein some attempt at quantification via modelling was done. It includes what appear to be calculations of GHG emissions and CO2e numbers which are not discussed anywhere in the DEIR. Additionally, as noted above, the Draft EIR fails to analyze GHG emissions from sources outside of the "Focus Area" to which the Draft EIR was limited. The Draft EIR must be revised to consider the environmental impacts of GHG emissions from the whole project.

Response O-4-12

The Draft EIR page 4.7-17 states, "Impact GHG-1 THE PROPOSED PROJECT WOULD BE CONSISTENT WITH STATEWIDE PLANS, POLICIES AND REGULATIONS, GENERAL PLAN POLICIES, SCOPING PLAN AND MAJOR GOALS OF SCAG'S 2016-2040 RTP/SCS AIMED AT REDUCING GHG EMISSIONS." However, the listed date of the RTP/SCS (2016-2040) in this sentence is a typo and the consistency analysis that follows in Table 4.7-2 (Draft EIR 4.7-18 through 4.7-24) "lists the relevant strategies identified in the SCAG 2020-2045 RTP/SCS that could be implemented to help achieve the State-mandated GHG emissions reduction targets and provides an analysis of project consistency with each strategy". This consistency analysis is also provided in the Draft EIR Appendix B (Table 10, page 39). As such, the Draft EIR does identify consistency with the 2020-2045 (RTP/SCS) plan, and thus the commenter's assertion that the Draft EIR does not identify consistency with the 2020-2045 (RTP/SCS) plan is incorrect. For clarification, the Final EIR will include the following minor revision to correct the typographical error on page 4.7-17:

Impact GHG-1 THE PROPOSED PROJECT WOULD BE CONSISTENT WITH STATEWIDE PLANS, POLICIES AND REGULATIONS, GENERAL PLAN POLICIES, SCOPING PLAN AND MAJOR GOALS OF SCAG'S ~~2016-2040~~ 2020-2045 RTP/SCS AIMED AT REDUCING GHG EMISSIONS.

Regarding the commenter's assertion that modeled GHG emissions are not discussed in the Draft EIR, the Draft EIR (page 4.7-16) states "Table 4.7-1 summarizes the estimated operational emissions as well as the amortized construction emissions based on the CalEEMod output files provided in Appendix B of this report." Table 4.7-1 of the Draft EIR (page 4.7-17), which reports the results of CalEEMod output provided in Appendix B, shows that the project's annual GHG emissions (operational emissions plus amortized construction emissions) would be 3,564 (MT CO2e). As such, the commenter's assertion that the project's estimated GHG (CO2e) emissions are not discussed anywhere in the Draft EIR is incorrect. No revisions to the Draft EIR are needed to address this comment.

In response to the discussion of "Focus Area," the term is not mentioned anywhere else within the commenter's letter, despite the reference to it being "noted above," nor is this term used in the Draft EIR analysis. As such it is unclear what this comment is referring to or the context in which it is made, and it appears this is a typographical error. Section 4.7 *Greenhouse Gas Emissions,* analyzes the potential greenhouse gas emissions from the entire project and concluded that such impacts would be less than significant based on consistency with the SCAG 2020-2045 RTP/SCS and the 2008 and 2017 CARB Scoping Plan.

Comment O-4-13

The commenter states that the Draft EIR is required to consider and adopt all feasible air quality and ghg mitigation measures. They state the Draft EIR finds that the project will have no significant and unavoidable impacts on air quality and greenhouse gas emissions, for several reasons, one of which is the consistency with the 2016 Ventura County AQMP population increase estimates. The commenter states this is conclusory and evades the analysis under CEQA. Even assuming the Project may take credit for all the claimed VMT reductions it outlines, the project will still have a significant GHG emissions impact which requires that the DEIR adopt a finding of a significance and the adoption of all feasible mitigation measures to ameliorate this impact. Instead, the DEIR again defers discussion of air quality and greenhouse gas emissions to the future, or never, and relies on the qualitative analyses about regulatory compliance and faulty inference that its impacts can be masked and assimilated under the guise of global climate change analysis.

Response O-4-13

The first part of this comment appears to conflate the Draft EIR analysis of air quality impacts regarding consistency with the AQMP and the Draft EIR analysis of GHG emissions. There is no discussion or conclusion within the Draft EIR evaluation of GHG emissions (Section 4.7) that indicate the determination that GHG impacts would be less than significant was based in any way on consistency with the 2016 Ventura County AQMP population increase estimates, which the commenter seems to imply. The second part of the comment about reliance on qualitative analyses about regulatory compliance and faulty inference that its impacts can be masked and assimilated under the guise of global climate change analysis appears to conflate the Draft EIR analysis of GHG impacts with the Draft EIR analysis of air quality impacts. There is no discussion in the Draft EIR evaluation of air quality impacts (Section 4.2, *Air Quality*) that relates a determination of significance for air quality impacts in any way to global climate change analysis. Accordingly, this response addresses the commenter's air quality analysis concerns about the AQMP separately from the GHG analysis concerns about the qualitative analysis.

Air Quality

As discussed in the Draft EIR evaluation of air quality impacts (Section 4.2) and Appendix B of the Draft EIR, all evaluations of the project's potential air quality impacts (including consistency with the applicable AQMP) have been prepared based on the guidance and direction of the Ventura County Air Pollution Control District (VCAPCD) Air Quality Assessment Guidelines. The VCAPCD Air Quality Assessment Guidelines state that project consistency with the AQMP can be determined by comparing the actual population growth in the county from the project with the projected growth rates used in the AQMP. Therefore, a demonstration of consistency with the population forecasts used in the most recently adopted AQMP was used for assessing project consistency with the AQMP. In addition, the VCAPCD provided a comment letter (dated May 23, 2022) on the project Draft EIR that did not take issue with the discussion or evaluation of consistency with their AQMP. As such, no revisions of the Draft EIR Air Quality analysis or imposition of mitigation measures are warranted to address this comment as no significant impact would occur and the commenter has provided no substantial evidence to support their conclusory assertion that a significant air quality impact would occur.

GHG Emissions

It is unclear what the statement by the commenter is regarding, or what is meant by asserting that the analysis infers "impacts can be masked and assimilated under the guise of global climate change analysis." According to the CEQA Guidelines Section 15064.4(b) "In determining the significance of a project's greenhouse gas emissions, the lead agency should focus its analysis on the reasonably foreseeable incremental contribution of the project's emissions to the effects of climate change." [emphasis added] Therefore, it is unclear why the commenter expresses an objection to the analysis of GHG emissions under the "guise" of global climate change analysis.

Moreover, as reported in the Draft EIR (page 4.7-13), CEQA Guidelines Section 15064.4(a) states that [for evaluating the significance of GHG impacts] a lead agency shall have discretion to determine, in the context of a particular project, whether to:

- Quantify greenhouse gas emissions resulting from a project; and/or
- Rely on a qualitative analysis or performance-based standards.

As discussed in the Draft EIR the City does not have an adopted Climate action plan (page 4.7-12), and no quantitative GHG emissions significance threshold for general use in the environmental review process of non-industrial projects that would be applicable to the proposed project have been adopted by a local, regional, or State agency per the requirements of CEQA Guidelines Section 15064.7(b) (page 4.7-13). Therefore, the Draft EIR (page 4.7-24) reports that in the absence of an adopted quantitative threshold for determining the potential significance of GHG emissions that would be applicable to the proposed project, in accordance with CEQA Guidelines Section 15064.4(b)(3), the determination of the significance of the project's GHG emissions impact is based on a qualitative analysis considering the project's consistency with applicable statewide, regional, and local plans adopted for the purpose of reducing GHG emissions.

The project would comply with statewide, regional, or local plan for the reduction or mitigation of GHG emissions including solar readiness to code and EV parking space provision as well as energy conservation standards of Title 24 Building Energy Efficiency Standards (Part 6) and Green Building Standards (Part 11). The project would also be designed to meet or exceed "green" building standards including energy efficiency to achieve equivalency to USGBC LEED Gold Certification. As shown in Section 4.7, *Greenhouse Gas Emissions*, Table 4.7-2, the project would be consistent with the 2020-

2045 RTP/SCS, the implementation of which CARB has stated would achieve the per capita reduction by 2035, relative to 2005 levels, as established by CARB for the region. The project also would be consistent with the policies of the 2008 Scoping Plan and the 2017 Scoping Plan Update as shown in Table 4.7-3 and Table 4.7-4. The Scoping Plan and Scoping Plan Update provide the framework for reducing emissions to 1990 levels by 2020 and to 80 percent below 1990 levels by 2050, respectively. Therefore, based on the CEQA Guidelines for determining the significance of GHG emissions, the currently available adopted plans for reducing GHG emissions applicable to the project, and the absence of applicable adopted quantitative significance thresholds, potential impacts would be less than significant.

The commenter provides no substantial evidence to contradict these findings or assert a more appropriate threshold or standard by which to determine the potential significance of GHG emissions that would "focus its analysis on the reasonably foreseeable incremental contribution of the project's emissions to the effects of climate change" per CEQA Guidelines Section 15064.4(b). There is no statement in the Draft EIR Section 4.7, *Greenhouse Gas Emissions*, that states (or implies) that no [mitigation measure] "is needed because the analysis would be subsumed by global climate change context." As such, no revision to the Draft EIR analysis is warranted to address this comment.

Comment O-4-14

The Draft EIR provides inadequate analysis to housing impacts, despite the nearly 420 proposed units and 50 low-income units that will significantly increase population density in the area. (Draft EIR pages 2.6; 2-12/15). The commenter states it is therefore necessary to perform a housing impact analysis, especially considering the site's existing vacant commercial building that will result in a significant population increase in the area, not only due to the housing development but also because of the additional patronage from the reintroduction of commercial uses and planned pedestrian access. An agency may not avoid its responsibility to prepare proper environmental analysis by failing to gather relevant data. Here, there are clear housing impacts because of the nature of the project, and the City is obligated to include housing impacts in its environmental impact analysis.

While an analysis is provided, it indicates that the population increase is within the projected population estimates under the Southern California Association of Government's (SCAG's) 2045 plan. However, this estimate and analysis does not include the project's contribution per annum and instead evaluates and estimates an approximate its overall increase and contribution increase of 1,121 residents of total growth until 2045, and which would constitute almost half of the Thousand Oaks 2021-2029 Housing Element allotment, while only providing a 12 percent provision of low-income units for the area (Draft EIR pages 4.11-5-7).

Based on this, the Draft EIR concludes the population growth would be within estimated SCAG regional forecast and impacts would be less than significant (Draft EIR page 4.11-8). However, the project's contribution per annum could be well in excess of annual contributions to population growth and occupies nearly half of the growth attributions in the Thousand Oaks Housing Element for the next seven years. As such, the City should attend to proper estimates of the project's overall contributions.

Response O-4-14

First, the commenter incorrectly states that the project's increase of 1,121 residents would constitute almost half of the Thousand Oaks 2021-2029 Housing Element allotment, while only providing a 12 percent provision of low-income units for the area (Draft EIR pages 4.11-5-7). The Draft EIR does not state this.

As described in Section 4.11, *Population and Housing,* of the Draft EIR, housing impacts were assessed. The proposed project is anticipated to increase the total population of the city by 1,121 residents utilizing a rate of 2.67 people per household with 420 household units for the proposed project. This would bring the city's total population to 126,547, a roughly one percent increase from the current population. This number is well below the SCAG projected population estimate of 144,700 by 2045. Therefore, the proposed project would not generate population in excess of that anticipated by the City or SCAG planning efforts.

Further, as discussed in Section 4.11, *Population and Housing,* of the Draft EIR, the additional 420 housing units would result in a less than one percent increase of the total housing units (48,586) of the city. This is below the new housing unit estimated to be developed under the 2022 Housing Element and in SCAG Regional Housing Needs Allocation (RHNA) allocation plan, which projected up to 54,195 housing units by 2045 for the city. Therefore, the proposed project would not create dwelling units in excess of those anticipated by the City or SCAG planning efforts.

Currently, the site is a vacant commercial property. The proposed project would result in 15,000 square feet of commercial space while generating 36 new job opportunities based on the data from SCAG (Natelson Company 2001). The potential increase of 36 retail and service employees would likely come from existing population or new residents associated with the proposed project.

Comment O-4-15

The commenter states that the Draft EIR's Transportation and Traffic analysis is insufficient and inconsistent. The City of Thousand Oaks Active Transportation Plan lists as a goal the development of an active transportation friendly environment. (DEIR 4.14-8) However the Project is being built adjacent to a well-traveled road in Thousand Oaks and plans to add over 1,000 residents and significant patronage who will require transportation either through public transit, car, or otherwise. These nontrivial increases will necessarily add stress to the nearby freeway and roads, and especially the already-congested Moorpark Road and 101 Freeway offramp nearby and Hampshire Road and the other businesses and schools identified surrounding the Project site

Response O-4-15

To the extent this comment regards traffic congestion, it does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR because traffic congestion is no longer a CEQA impact under SB 743.

The Draft EIR's Transportation and Traffic Analysis provides the Vehicle Miles Traveled (VMT) analysis required by CEQA which determined that based on the thresholds of significance, the project would not result in a significant transportation impact. Specially, the location of the project, close to Thousand Oaks Boulevard, will encourage more people to walk and/or ride a bike to shopping, work, concerts etc. which increases active transportation which results in a lower VMT. The City's Active Transortation Plan (ATP) includes a list of goals that were provided to guide the planning for the development of the ATP. Included in the ATP are projects to increase active transportation including bike lanes and sidewalk. The project is adjacent to existing bike lanes and sidewalks. The project will include bicycle parking for both the commercial and residential components of the project which exceed the requirements for the Green Building Code. The nearest bus stop to the proposed project is located at the intersection of Hampshire Road and Townsgate Road, approximately 475 feet south of the project site, serviced by Commuter Express 422 (LADOT 2022a). Another nearby bus stop is located at the intersection of Thousand Oaks Boulevard and Skyline Drive, approximately 0.5 mile north of the project site, serviced by TOT Route 43, which covers Thousand Oaks Boulevard and

Westlake areas (City of Thousand Oaks 2022b). The main loading and unloading zones for the transit areas are located at the southeast corner of the project site near the intersection of Hampshire Road and Thousand Oaks Boulevard.

The project is not expected to add any traffic to the Moorpark Road and 101 Freeway off-ramp as it's adjacent to the Hampshire Road/U.S. 101 Interchange. The Hampshire Road/U.S. 101 interchange and the Westlake Boulevard/Agoura Road intersection are included in the City's Traffic Impact Mitigation Fee program. The project will pay towards the future improvement by paying traffic impact fees which will reduce the congestion (stress) at the interchange and the Westlake Boulevard/Agoura Road Intersection. Although there will an increase in vehicle trips on the adjacent roadways, the roadways have sufficient capacity to accommodate the increase in trips.

Comment O-4-16

The commenter states that the Draft EIR fails to adequately disclose and analyze the project's significant noise impacts. The Draft EIR fails to adequately analyze all of the project's significant noise impacts. For example, the project's analysis excludes the impacts of the at least seven (7) nearby sensitive receptors, especially the Little Dreamers Preschool and Windsor Terrace of Westlake Village convalescent home, and the excessive noise levels that will impact these many receptors, especially concerning the planned demolition and planned residential and commercial uses and increased pedestrian traffic (DEIR 4.10-18; MM NOI-1). The project must provide sufficient mitigation for these significant noise impacts.

Response O-4-16

The commenter states that noise impacts to nearby receptors such as the Little Dreamers Early Childhood Preschool and the Windsor Terrace of Westlake Village Convalescent Home were not addressed in the Draft EIR. However, this statement is incorrect. These receptors, as well as other receptors, are identified on page 4.10-3 of the Draft EIR as described in the "Sensitive Receptors" section. In addition, construction and operational noise impacts to these nearby receptors including the preschool and convalescent home are quantitatively addressed through the estimation of project noise levels in Tables 4.10-4 and 4.10-7 of the Draft EIR. As discussed in Response O-4-10 above, detailed and project-specific mitigation, including the installation of temporary noise barriers are included in Mitigation Measure NOI-1, which would reduce construction noise impacts. Additionally, as demonstrated in the Draft EIR, there are no operational noise impacts associated with project implementation and impacts would be less than significant.

Comment O-4-17

The commenter states that despite recognizing the significant and unavoidable noise impacts to the nearby sensitive receptors for both the project's construction and the day-to-day use of the project upon completion, it nonetheless provides no additional mitigation and still concludes that none is required. (DEIR 4.10-19). The project must provide sufficient mitigation for these significant noise impacts

Response O-4-17

The commenter is referred to Responses O-4-10 and Responses O-4- 6, above. Moreover, the commenter is incorrect and suggesting that the Draft EIR identified significant and unavoidable impacts related to the project's "day-to-day use" (operations). There are no additional feasible

mitigation measures available for the proposed project to implement to mitigate significant impacts associated with noise to less than significant.

Comment O-4-18

The commenter states that the Draft EIR fails to adequately disclose and analyze the project's significant hazards impacts. Despite the presence of not only nearby sensitive receptors, businesses, and other residences, the DEIR concludes no mitigation is required without also providing detailed analysis or project specific metrics on the transportation and demolition of the building beyond consistency with steps outlined in the Thousand Oaks Municipal Code. (DEIR 4.8-13) An agency may not avoid its responsibility to prepare proper environmental analysis by failing to gather relevant data.

The City must provide sufficient analysis to the transportation and management of hazards and hazardous materials given the proximity of the Project to nearby sensitive receptors, residential communities, and local businesses.

Response O-4-18

The commenter is referred to pages 4.8-2 through 4.8-3 of the Draft EIR in Section 4.8, *Hazards and Hazardous Materials*. Federal and state laws require that soils and groundwater having concentrations of contaminants that are higher than certain acceptable levels (often called 'screening levels') are handled and disposed as hazardous waste during excavation, transportation, and disposal. The California Code of Regulations (CCR), Title 22, Sections 66261.20-24 contains technical descriptions of characteristics that would cause a waste to be classified as a hazardous waste. Hazardous materials require special methods of disposal, storage, and treatment, and the release of hazardous materials requires an immediate response to protect human health and safety, and the environment. Improper disposal can harm the environment and people who work in the waste management industry.

Moreover, the commenter is referred to the Draft EIR, Section 4.8, *Hazards and Hazardous Materials* page 4.8-7 which provides, the transportation of hazardous materials is regulated by the Hazardous Materials Transportation Act (49 CFR Section 101 et seq.), which is administered by the Office of Hazardous Materials Safety within the Pipeline and Hazardous Materials Administration of the U.S. Department of Transportation (DOT). The Hazardous Materials Transportation Act governs the safe transportation of hazardous materials by all modes. DOT regulations that govern the transportation of hazardous materials are applicable to any person who transports, ships, or causes to be transported or shipped hazardous materials, or who is involved in any way with the manufacture or testing of hazardous materials packaging or containers.

The commenter is also referred to page 4.8-9 of the Draft EIR which states that California Health and Safety Code Section 25150 (Tanner Act) mandates that local governments have hazardous waste plans for dealing with hazardous wastes generated within the community, including identifying sources of hazardous wastes, transportation routes needed to remove the waste and areas for potential treatment and disposal. regional emergency planning. The County Hazardous Waste/Materials Management Plan is the Tanner 1986 document for the County and sets out the standards and plans for transportation and disposal of hazardous wastes including household wastes. On July 10, 1990, the City adopted the CHWMP as an element of the City General Plan.

The Draft EIR at page 4.8-14 states that a licensed transportation of any hazardous materials along designated routes would minimize any risks from use, storage, or transport of hazardous materials during construction. Given the mandatory requirements for implementation of the aforementioned

statutes, impacts associated with transportation of hazardous materials would ensure that the project did not present a significant risk to the public or the environment, and impacts would be less than significant

Comment O-4-19

The comment states that Thousand Oaks is sensitive to wildfires, the project site is in a "Very High" Fire Severity Zone, the Draft EIR should include more than "consistency with state and local fire and hazard mitigation and emergency plans" without the need for mitigation. Secondly, the commenter asserts that the project construction phase would increases traffic congestion and increase fire danger through construction activity, and as such a project-specific analysis of emergency protocols should be provided.

Response O-4-19

As discussed in Section 4.16, *Wildfire*, of the Draft EIR, the project is located within the Very High Fire Hazard Severity Zone (VHFHSZ) classification. Compliance with state and local fire hazard mitigation and emergency codes, plans, systems, and procedures would work to avoid significant impacts. The classification highlights the need for compliance with all safety measures and systems but does not dictate a set of analysis procedures for proposed projects. Project compliance would include an extensive array of code requirements and project features described the analysis, and the regulatory setting section of the analysis describes a robust network of systems, programs, and procedures to address wildfires in the project area (see also the Wildfire Technical Study, Draft EIR Appendix I).

The project site is a previously developed site, similar to other developed portions of the city that are also classified in the VHFHSZ. The project site was previously developed and operating as a commercial shopping center and has been developed with fire-fighting infrastructure (i.e., water supply, fire hydrants) and other urban features that aid in fire-fighting. The proposed project construction and design is required to comply with currently applicable City and County codes and protocol. These measures include the latest City-approved fire-safety measures. Additionally, the project would implement the Ventura County Multi-Hazard Mitigation Plan (2015), which would be more stringent than those of the existing shopping center to be demolished.

Comment O-4-20

The commenter states that the DEIR finds that the Project will have less than significant impacts despite recognizing the presence of ten City Protected coast live oak and two City protected sycamore trees present on the Project site (DEIR 4.3-10/11) and attention to the City's Oak Tree Preservation and Protection Guidelines and Oak and Landmark Tree Ordinance (DEIR 4.3-11). The mitigation indicates impact in the form of removal of six oak trees and potential presence of nesting birds (DEIR 4.3-8). The City defers to mitigation in the form of replacing the trees at a 3:1 ratio pursuant to code to the City's Tree Protection Guidelines. However, although six oak trees will be removed and eighteen (18) are planned to be planted in their stead, there is no analysis done on the likelihood of the planted oaks reaching maturity to fully account for the removal of the six oak trees, or what preservation measures will be done to ensure the survival and livelihood of the remaining four oak trees. A full analysis of the oak tree mitigation measure, as well as finding non-deferred mitigation is needed. The comment indicates that an agency may not avoid its responsibility to prepare proper environmental analysis by failing to gather relevant data. Sundstrom v. County of Mendocino (1988) 202 Cal.App.3d 296, 311.

Response O-4-20

The comment is noted. As stated in MM BIO-2, mitigation for six oak trees would be accomplished in accordance City's adopted Oak Tree Preservation and Protection Guidelines and Oak and Landmark Tree Ordinance. MM BIO-2 has been revised to require that all mitigation oak and landmark trees be monitored annually for a period of 5 years following installation. Revisions for MM BIO-2 further states that all mitigation oak trees shall be in good-to-excellent health at the end of the 5-year monitoring period and any trees that die or are in fair-to-poor health at the end of the 5-year monitoring period must be replaced with a healthy tree, and the replacement tree(s) shall be monitored for a period of 5 years until every mitigation tree is in good-to-excellent health 5 years after installation.

While the discussion of protected trees is covered in detail in Section 4.3, *Biological Resources*, of the Draft EIR, a discussion of additional tree monitoring requirements will be added to the Section 4.3, *Biological Resources*, as follows:

Insertion into mitigation measure, page 4.3-11, *Biological Resources* at the beginning of mitigation measure BIO-2:

> <u>All mitigation oak and landmark trees shall be monitored annually for a period of 5 years following installation. All mitigation oak trees shall be in good-to-excellent health at the end of the 5 year monitoring period and any trees that die or are in fair-to-poor health at the end of the 5 year monitoring period must be replaced with a healthy tree, and the replacement tree(s) shall be monitored for a period of 5 years until every mitigation tree is in good-to-excellent health 5 years after installation.</u>

See Response A-5-14 for the response regarding an inspection of diseases, pests, or pathogens prior to protected tree removal.

Comment O-4-21

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

General plan consistency is "the linchpin of California's land use and development laws; it is the principle which infused the concept of planned growth with the force of law." See *Debottari v. Norco City Council* (1985) 171 Cal.App.3d 1204, 1213. State law mandates two levels of consistency. First, a general plan must be internally or "horizontally" consistent: its elements must "comprise an integrated, internally consistent and compatible statement of policies for the adopting agency." See Gov. Code § 65300.5; Sierra Club v. Bd. of Supervisors (1981) 126 Cal.App.3d 698, 704. A general plan amendment thus may not be internally inconsistent, nor may it cause the general plan as a whole to become internally inconsistent. See DeVita, 9 Cal.4th at 796 fn. 12.

Response O-4-21

The comment serves as an opening remark. The commenter does not provide any specific information as to any how the Draft EIR fails to support its findings with substantial evidence. Thus, this comment does not contain any substantive comments or questions about the environmental analysis or

conclusions contained in the Draft EIR. City of Thousand Oaks decision makers will consider all comments on the proposed project. No further response is necessary.

Comment O-4-22

The commenter states state law mandates two levels of consistency. First, a general plan must be internally or "horizontally" consistent: its elements must "comprise an integrated, internally consistent and compatible statement of policies for the adopting agency." The commenter also states, state law requires "vertical" consistency, meaning that zoning ordinances and other land use decisions also must be consistent with the general plan. State law requires that all subordinate land use decisions, including conditional use permits, be consistent with the general plan. The commenter states a project cannot be found consistent with a general plan if it conflicts with a general plan policy that is "fundamental, mandatory, and clear," regardless of whether it is consistent with other general plan policies. Moreover, even in the absence of such a direct conflict, an ordinance or development project may not be approved if it interferes with or frustrates the general plan's policies and objectives.

As explained in full below, the project is inconsistent with the City's Central City Community Plan, ("Community Plan"). As such, the project violates the State Planning and Zoning law.

Response O-4-22

The comment serves as a continuation of the opening remark (Comment O-4-23). The commenter does not provide any specific information as to any how the Draft EIR fails to support its findings with substantial evidence. Thus, this comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. City of Thousand Oaks decision makers will consider all comments on the proposed project. No further response is necessary.

Comment O-4-23

The project is Inconsistent with the General Plan, and thus the DEIR's Conclusions Regarding Impacts on Land Use and Planning are Unsupported by Substantial Evidence

Response O-4-23

The comment serves an opening remark to comment O-4-24 below. The commenter does not provide any specific information as to any how the Draft EIR fails to support its findings with substantial evidence. Thus, this comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. City of Thousand Oaks decision makers will consider all comments on the proposed project. No further response is necessary.

Comment O-4-24

The commenter states the Draft EIR fail to establish the project's consistency with several Community Plan goals, policies, and programs including the following (DEIR 4.9-6-12):

- To provide and maintain a system of natural open space and trails;
- To develop appropriate additional tools enabling commercial, industrial and residential development to flourish in an efficient and compatible manner.

- To provide high quality environment, healthful and pleasing to the senses, which values the relationship between maintain of ecological systems and people's general welfare.
- The City's unique natural setting will be a guide to its future physical shape … the City will support and encourage open space/greenbelt buffers around it, separating the City from adjoining communities.
- Low profile and aesthetically designed signage shall be allowed for all developments; no billboards shall be allowed.
- Strive to provide a balanced range of adequate housing for Thousand Oaks Planning Area residents in a variety of locations for all individuals regardless of age, income, ethnic background, marital status, physical or developmental disability.
- Provide a wide range of housing opportunities for persons of all income levels.
- Provide housing opportunities for persons with special needs.
- A City-wide system of pedestrian and bicycle facilities that provide safe, continuous accessibility to all residential, commercial, and industrial areas, to the trail system and to the scenic bike route system shall be provided and maintains.
- Achieve and maintain an environment in which noise-sensitive uses are not disturbed by noise that exceeds exposure guidelines in this Noise Element.

Response O-4-24

Table 4.9-1 in Section 4.9, *Land Use* in the Draft EIR includes the goals, polices, and programs referenced in the comment. The table describes the proposed project's consistency with policies of the General Plan either directly or indirectly related to avoiding or mitigating environmental effects. Of the goals, policies and programs referenced in the comment, one (noise) has the potential to be inconsistent with the General Plan, and the other is unknown (special needs housing).

As described in Section 4.12, *Noise*, construction noise impacts would be potentially significant and unavoidable. However, construction impacts are temporary and noise impacts would cease when project construction is completed, and moreover, after construction is completed, the project would be consistent with those noise policies. Further, the project incorporates mitigation measures during the construction period to lessen the construction noise impacts.

Consistency with goal of providing housing opportunities for persons with special needs is unknown. The project will result in 420 new units. As currently described in Chapter 2.0, *Project Description* of the Draft EIR, the project sets aside 50 low-income level affordable units. However, no information is available that describes the future tenants, how the units will be distributed onsite, or marketed. Moreover, nothing in the development would prohibit any unit to be occupied by persons with special needs.

Comment O-4-25

The commenter states the project fails to discuss its conformity with each of the aforementioned Goals, Policies, and Programs laid out in the City's Community Plan, even though the Project will have reasonably foreseeable impacts on land use, traffic, vehicle trip generation, air quality, and emissions. This discussion is relevant not only to compliance with land use and zoning law, but also with the contemplation of the Project's consistency with land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating environmental impacts. The DEIR should be amended to include analysis of the Project's comportment with the Goals, Policies, and Programs listed above.

Response O-4-25

The comment serves as a conclusion to the above referenced comment (O-4-24). Further, as detailed in response to Comment O-4-24, the analysis within the Draft EIR discusses the consistency of the project with the referenced goals, polices and programs.

Comment O-4-26

The commenter states the Draft DEIR Should be Revised to Consider the Project's Consistency with the Upcoming Revisions to the City's Housing Element.

The DEIR includes discussion of the Project's consistency with the City's present housing element. However, the City recently adopted housing element on January 22, 2022 of the 2021-2029 Housing Element. As development of the Project area will take place during the upcoming planning period and not the current period, the DEIR should include an analysis of the Project's consistency with the upcoming Housing Element update and its various policies and programs.

Response O-4-26

As discussed in Section 4.11, *Population and Housing* of the Draft EIR, the environmental analysis takes into consideration the most recent 2021-2029 Housing Element. The proposed project would increase residential units in Thousand Oaks commensurate with what is anticipated by the City's latest Housing Element, which also supports the City's fulfillment of its RHNA obligation. The project is also consistent with goals of the Housing Element such as providing a wide range of housing opportunities for persons of all income levels as the projects provides 50 affordable housing units.

Letter O-5

Many Mansions

May 23, 2022

Planning Commission
City of Thousand Oaks
2100 Thousand Oaks Blvd.
Thousand Oaks, CA 91362

Via E-Mail

Re Item #8(A) IMT Capital V. Hampshire V LLC
Letter of Support

Dear Members of the Planning Commission:

My name is Rick Schroeder, President of Many Mansions, a nonprofit affordable housing developer, owner, manager, and service provider headquartered in Thousand Oaks.

We support the actions sought by the applicant at tonight's hearing and as set forth in Item 8 (A).

The City of Thousand Oaks needs more affordable housing. The proposed project includes 54 units of new affordable housing – 50 units at 80% Area Median Income ('low income') and 4 units at 120% Area Median Income ('medium income').

It is becoming increasingly difficult to develop affordable housing in this City. While state and federal affordable housing financing sources have increased, these funding sources do not favor suburban cities such as Thousand Oaks, given its high land costs, low densities, and lack of public transportation.

O-5-1

Therefore, the City should take advantage of the development of such affordable housing as included in larger non-affordable housing developments. The amount of affordable housing as a percentage of the overall housing (15%) is reasonable.

The City of Thousand Oaks simply needs more housing. The mere shortage of housing in the City places tremendous pressure on housing costs and rents and impacts overall available affordable housing. The lack of any new housing forces homeowners and renters to 'crowd

1259 E. Thousand Oaks Blvd. Thousand Oaks, California 91362
Phone (805) 496-4948 Fax (805) 497-1305 manymansions.org

out' low-income residents and drives up rents. The average rent for a two-bedroom apartment unit in Thousand Oaks now exceeds $2,400.

The proposed project adds 420 units of housing to the City's housing stock. This project, along with other current developments in the City, will help lower overall rents and thus make existing housing more affordable.

The beautiful design, proposed retail, and other amenities makes the proposed project a welcome addition to the City of Thousand Oaks.

We support the proposed action.

O-5-1
cont'd

Sincerely,

Rick A. Schroeder,
President,
Many Mansions

Letter O-5

COMMENTER: Many Mansions

DATE: May 23, 2022

Comment O-5-1

The commenter states are in support of the proposed project since it would add to the City of Thousand Oaks' housing needs, particularly for affordable housing. The commenter applauds the project design and also states that the proposed project would add 420 housing units to the City's housing stock which in turn will help lower rents and thereby make existing housing more affordable to residents in the city.

Response O-5-1

Comment noted. This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. City of Thousand Oaks decision makers will consider all comments on the proposed project. No further response is necessary.

This page intentionally left blank.

3 Errata to the Draft EIR

This chapter presents specific text changes made to the Draft EIR since its publication and public review. The changes are presented in the order in which they appear in the original Draft EIR and are identified by the Draft EIR page number. Text deletions are shown in ~~strikethrough~~, and text additions are shown in underline. The information contained within this chapter clarifies and expands on information in the Draft EIR and does not constitute "significant new information" requiring recirculation. (See Public Resources Code Section 21092.1; CEQA Guidelines Section 15088.5.)

3.1 Revisions to the Draft EIR

Cover Title and Table of Contents

Page I (Table of Contents)

4.4 Cultural and Tribal Resources..... 4.4-1

Executive Summary

Pages ES-8 through ES10I (Summary of Impacts and Mitigation Measures)

Table ES-1 Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Impact	Mitigation Measure (s)	Residual Impact
Biological Resources		
Impact BIO-1. Implementation of the proposed project has the potential to impact nesting bird species and roosting bat species. Impacts would remain significant and unavoidable without mitigation.	**BIO-1 Bat and Nesting Bird Survey Avoidance:** Project-related activities shall occur outside of the bird breeding season (generally between ~~February 1~~ January 1 through ~~August 31~~ September 15) to the extent practicable. If construction must occur within the bird breeding season, then no more than ~~three~~ seven days prior to initiation of ground-disturbing activities (including, but not limited to site preparation, grading, excavation, and trenching) within the project site, a nesting bird pre-construction survey shall be conducted by a qualified biologist within the disturbance footprint plus a 100-foot buffer (300-foot for raptors), where feasible. If the proposed project is phased or construction activities stop for more than one week, a subsequent pre-construction nesting bird survey shall be required within three days prior to each phase of construction. Pre-construction nesting bird surveys shall be conducted during the time of day when birds are active and shall factor in sufficient time to perform this survey adequately and completely. A report of the nesting bird survey results, if applicable, shall be submitted to the City for review and approval prior to ground and/or vegetation disturbance activities.	Implementation of Mitigation Measure BIO-1 would reduce potential direct and indirect impacts to nesting birds and roosting bats to a less-than-significant level.

Impact	Mitigation Measure (s)	Residual Impact
	If nests are found, an appropriate avoidance buffer ranging in size from 25 to 50 feet for passerines, and up to 300 feet for raptors depending upon the species and the proposed work activity, shall be determined and demarcated by a qualified biologist with bright orange construction fencing or other suitable material. Active nests shall be monitored at a minimum of once per week until it has been determined that the young have fledged the nest. No ground disturbance or vegetation removal shall occur within this buffer until the qualified biologist confirms that breeding/nesting has ended, and all the young have fledged. If no nesting birds are observed during pre-construction surveys, no further actions would be necessary. If evidence of bat roosting is observed, building demolition shall not be allowed until a qualified biologist can verify that the roost is no longer active. If necessary, bats may be evicted and building demolished following submittal and approval of a Bat Avoidance Plan by CDFW.	
Impact BIO-~~3~~5: Implementation of the proposed project has the potential to disturb protected trees. Impacts would be significant and unavoidable without mitigation.	▪ **BIO 2 Minimize Impacts to Protected Trees:** The project shall take all necessary actions to comply with the requirements of the City's Oak Tree Preservation and Protection Guidelines and Oak and Landmark Tree Ordinance. These include preserving protected trees located on the project site whenever possible. A permit is required by the City before the start of project activities if any tree will be trimmed, cut, or removed. ▪ In accordance with the City of Thousand Oaks Tree Protection Guidelines the oak trees on the project site that would be removed shall be replaced at a ratio of 3:1 with two 24-inch box coast live oak trees and one 36-inch or 60-inch box coast live oak tree. ~~Six~~ Three coast live oak trees will be removed; therefore, ~~eighteen~~ nine coast live oak trees shall be planted onsite. ▪ An arborist shall conduct an inspection of diseases, pests or pathogens prior to protected tree removal and any infected trees be disposed using best available management practices relevant for each tree disease observed. ▪ All mitigation oak and landmark trees shall be monitored annually for a period of 5 years following installation. All mitigation oak trees shall be in good-to-excellent health at the end of the 5 year monitoring period and any trees that die or are in fair-to-poor health at the end of the 5 year monitoring period must be replaced with a healthy tree, and the replacement tree(s) shall be monitored for a period of 5 years until every mitigation tree is in good-to-excellent health 5 years after installation. ~~▪ A 63 percent encroachment into the protective zone (i.e., an area extending from the trunk to 5 feet from the edge of canopy [dripline]) of California sycamore tree #6 is proposed. The tree is not expected to survive this amount of impact. This tree shall be replaced onsite or at a City-approved offsite location determined and~~	Implementation of Mitigation Measure BIO-2 would reduce potential impacts to protected trees to a less-than-significant level.

Impact	Mitigation Measure (s)	Residual Impact
	~~approved by the Community Development Director prior to issuance of a grading permit with two 24-inch box and one 36-inch box California sycamore trees. Replacement trees should be planted with compatible drought tolerant landscaping and similar irrigation requirements. Tree locations shall be reflected in the landscape plan~~ ▪ ~~A 30 percent encroachment into the protective zone of California sycamore tree #7 is proposed. It is unknown if the tree would survive this amount of encroachment; therefore, an ISA certified arborist with a current ISA Tree Risk Assessment Qualification (TRAQ) shall confuct a Level 2 Basic Tree Risk Assessment and/or Level 3 Advanced Tree Risk Assessment to inspect the tree immediately following the completion of grading to determine the tree's likelihood of failure by assigning a risk rating of imminent, probably, possible, or improbable. If the risk rating for tree failure is determined to be "imminent" or "probable", the tree shall be removed and replaced onsite or at an offsite location determined and approved by the Community Develoment Director prior to the issuance of a grading permit. Due to the large size of this California sycamore tree (45-inch cumulative trunk diameter and 45- foot canopy spread), this tree shall be replaced with two 24-inch box and one 36-inch box California sycamore trees. Replacement trees should be plnated with compatible drought tolerant landscaping and similar irrigation requirements. Tree locations shall be reflected in the landscape plan. If the arborist determines the risk rating for tree failure to be "possible" or "improbable" with an unlikely likelihood of impacting a target and low consequence of failure, the tree shall be retained and preserved in perpetuity and no replacement trees would be required.~~ ▪ ~~Section 5, Oak and Landmark Tree Protection Plan, of the Oak and Landmark Tree Report (Rincon, 2022c [Appendix C]) shall be implemented to minimize project related impacts to oak and landmark trees that would be preserved prior to, and during, construction activities.~~	

Introduction

Page 1-1

This Draft Environmental Impact Report (EIR) has been prepared in accordance with the California Environmental Quality Act (CEQA) (Public Resources Code [PRC] Sections 21000 et seq.; California Code of Regulations [CCR], Title 14, Chapter 3, Sections 15000 et seq. [CEQA Guidelines]) to evaluate the environmental effects associated with the proposed T.O. Ranch Mixed-Use and Multi-Family Residential Redevelopment Project (proposed project) <u>(State Clearinghouse Number 2021120559)</u>

The proposed project is located on a 10.97-acre parcel at 325 Hampshire Road in the City of Thousand Oaks (City).

Page 1-3 (Section 1.4.1 Notice of Preparation)

In addition, a public scoping meeting was held during the ~~39~~ 41-day public comment period, in accordance with PRC Section 21083.9.

Page 1-4 (Table 1-1 NOP Comments and EIR Response)

Commenter	Comment/Request	How and Where it Was Addressed in Draft EIR
California Department of Transportation (Caltrans) January 20, 2022	Recommends prioritizing multi-modal and complete streets transportation elements to promote alternatives to car use, reduce greenhouse gas (GHG) emissions and better manage parking assets.	As detailed in Section 2, *Project Description*, the project provides parking, including secure bicycle parking. Project impacts to pedestrian and transit facilities are addressed in Section 4.14, *Transportation and Traffic*. Project impacts associated with GHG emissions are addressed in Section ~~4.6~~4.7, *Greenhouse Gas Emissions*.
Ventura County Air Pollution Control District (VCAPCD) January 31, 2022	Recommends that demolition activities be in compliance with VCAPCD's Rule 62.7, Asbestos – Demolition and Renovation.	Comments are addressed in Section 4.2, *Air Quality* and Section ~~4.7~~4.8, *Hazards and Hazardous Materials*.

Page 1-6 (Section 1.5 Scope of This EIR)

- Cultural and Tribal Resources
- ~~Tribal Cultural Resources~~

Project Description

Page 2-1 (Section 2.3, Project Location)

~~Little Dreamers Early Childhood~~ A preschool is on the southwest border of the project site.

Aesthetics and Visual Resources

Page 4.1-8 (Section 4.1.2, Regulatory Setting, City of Thousand Oaks Municipal Code)

Two existing landmark trees are identified on and immediately adjacent to the site and will be protected and in place, according to the Specific Plan.

Page 4.1-13 (Section 4.1.3, Impact Analysis for AES-1)

Significance After Mitigation

Impacts would be less than significant without mitigation. ~~The proposed project would result in less than significant impact without mitigation.~~

Pages 4.1-13 through 4.1-24 (Section 4.1.3, Impact Analysis for AES-2, AES-3, and AES-4)

Significance After Mitigation

Impacts would be less than significant without mitigation.

~~No mitigation is required.~~

~~Significance After Mitigation~~

~~The proposed project would result in no impact without mitigation.~~

Air Quality

Page 4.2-1 (Section 4.2.1 Setting)

The warmest months in the city of Thousand Oaks (Thousand Oaks; city) are July and August, with an average maximum temperature of 85 degrees Fahrenheit, while the coldest month of the year are December, January, and February, with an average minimum temperature of 65 degrees Fahrenheit.

Page 4.2-8 (Section 4.2.2 Regulatory Setting)

Rule 62.7 (Asbestos – Demolition and Renovation) VCAPCD regulates demolition and renovation operations involving ACM through Rule 6.27, which applies to any planned demolition or renovation that involves 100 square feet or more of ACM, with exceptions for indoor renovations, single-unit dwelling renovations performed by the owner or occupant, and work with certain categories of ACM that are removed according to a subset of VCAPCD requirements. The requirements include a noticing period and a general prohibition on demolition until ACM has been abated and removed from the location and requires that abatement be conducted by persons with specific asbestos certifications (primarily Asbestos Hazard Emergency Response Act [AHERA] certification).

Page 4.2-17 (Section 4.2.3 Impact Analysis for AQ-2)

Asbestos may be contained in the existing onsite building that will be demolished as part of the project's implementation. As detailed in Section 4.8.3, in the hazards impact analysis for construction (page 4.8.13), approval from the various City Departments would be dependent upon acceptance of the debris and recycling plan, which must address the disposal of hazardous wastes generated during demolition. In order to obtain a signature from VCAPCD, the applicant would have to demonstrate compliance with VCAPCD Rule 6.27, which requires abatement of

ACM by a licensed contractor prior to the issuance of a demolition permit. The requirements to obtain a demolition permit for the structures on the project location would ensure that ACM is handled appropriately and that hazardous materials are disposed of according to federal and State regulations. Therefore, impacts to workers and off-site receptors from asbestos exposure would be less than significant.

Page 4.2-20 (Section 4.2.3 Impact Analysis for AQ-3)

~~CARB further suggests that an operational health risk assessment be conducted for new developments resulting in sensitive receptors being placed within 500 feet of an existing high-volume roadway. A high-volume roadway is defined as an urban roadway with more than 100,000 vehicles per day. The closest freeway is the U.S. 101 approximately 510 feet north of the proposed project site, therefore the proposed project would not place new sensitive receptors within 500 feet of a high-volume roadway. In addition, the Title 24 standards would require new residential units to include MERV 13 standard air filtration (at a minimum) that would reduce PM_{10} emissions by at least 70 percent. Therefore, new residents are not anticipated to be adversely affected by exposure to vehicle exhaust long term.~~

Risk to Onsite Residents from Proximity to TAC Sources

The impacts of the environment on the project, specifically impact from proximity to freeways, is not one of the criteria identified in CEQA Guidelines Appendix G for determining whether a development would result in significant air quality impacts. Additionally, the purpose of environmental evaluation under CEQA is to identify the significant effects of the project on the environment, not the significant effects of the environment on the project as confirmed by *California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369 (Case No. S213478). Therefore, the discussion in this section is provided for informational and disclosure purposes only and is not considered part of the impact analysis for the purpose of CEQA compliance.

Gas Stations

The California Air Resources Board (CARB) recommends avoiding siting new sensitive land uses within 300 feet of a large gas station (defined as a facility with a throughput of 3.6 million gallons per year or greater) and recommends a 50-foot separation from all gas stations (*CARB 2005*). The project is adjacent to gasoline dispensing stations on both the north and south side. The fueling stations and tank vents for the station to the north of the project is approximately 90 feet north of Building A. The fueling stations and tank vents for the station to the south are approximately 70 feet south of Building B and 54 feet east of the small open space area on the southern end of the project property. This is greater than the 50-foot separation from all gas stations. According to the California Energy Commission total throughput of gasoline in the City of Thousand Oaks in 2020 was 20,924,081 gallons (CEC 2022). According to the VCAPCD's Facility Information System there are 26 facilities with permits for gasoline dispensing, of those 13 are identifiable as commercial gasoline dispensing stations such as those by the site (VCAPCD 2006). Averaging the throughput over these thirteen stations only would result in a throughput of approximately 1.6 million gallons per year, well below the 3.6 million gallons required to qualify as a large gas station by CARB. According to CARB 96 percent of gasoline dispensing facilities have a throughput of less than 2.4 million gallons per year (CARB 2005a).

Therefore, given the amount of gasoline sold in Thousand Oaks, the number of gasoline dispensing facilities, and the fact that 96 percent of gasoline stations have an annual throughput

of 2.4 million gallons, the service stations near the project are anticipated to be under the 3.6 million gallons per year throughput that warrants a 300 foot buffer distance. As stated, the project's receptor locations would be greater than 50 feet from the fuel islands and tank vents and therefore would not require a health risk assessment for the proximity to these gas stations. Additionally, as discussed in the Draft EIR the residential units within the project would be required to install MERV filtration units of a minimum rate of MERV 13. This would further reduce potential risk to future residents at the project site.

101 Freeway

The project site is located approximately 450 feet south of the U.S.101 Freeway therefore, a refined health risk assessment (HRA) was performed by Air Quality Dynamics to determine the potential risk to onsite residents from the project's proximity to the freeway (Air Quality Dynamics 2022).

The assessment and modeling methodologies used in preparation of the freeway health risk assessment followed the procedures outlined by USEPA, the California Environmental Protection Agency, and VCAPCD. The HRA is included as Attachment A to the Response to Comments. In compliance with 2019 Title 24 requirements, the proposed project would include MERV filtration systems with a minimum rating of MERV 13. With the implementation of MERV 13 filtration systems throughout the site, the cancer risk for the project site from proximity to the U.S. 101 would range from 0.97 in 100,000 in Building B to 1.7 in 100,000 in Building A closest to the freeway (northeast corner of the building). With implementation of air filtration systems with a rating of MERV 14 to MERV 16 for units where implementation of MERV 13 filtration systems results in a cancer risk greater than 1 in a 100,000, risk at these units are reduced to a maximum of 1 in 100,000 equal to the VCAPCD's 1 in 100,000 threshold (Air Quality Dynamics 2022). Additionally, as indicated in Attachment A, non-cancer risk levels range from 0.01 to 0.02 with the incorporation of MERV 13 filtration and is below the VCAPCD's non-cancer acute and chronic thresholds of 1.

Based on results of the HRA, MERV filtration systems rated between MERV 13 and MERV 16 will be installed depending on residential unit's location. Detailed figures that show the MERV ratings applied to units by location are included as Appendix A to the HRA (Air Quality Dynamics 2022). In addition, all windows will be weatherproofed for both residential and commercial portions of the development and limited window opening capability will be applied to the residential units along the northern boundary. Implementation of these measures will ensure that risk is within acceptable levels for the onsite residents.

Biological Resources

Page 4.3-2 (Section 4.3.1 Setting, Trees and Land Cover)

~~Ten~~ Eight oak trees are protected under the City of Thousand Oak Tree Protection Guidelines, and two sycamore trees

Page 4.3-8 (Section 4.3.3, Impact Analysis for BIO-1)

Direct impacts resulting from proposed project activities conducted during the bird nesting season (typically ~~February 1~~ January 1 through ~~August 31~~ September 15) could include mortality during vegetation removal and building demolition.

Page 4.3-9 (Section 4.3.3,Mitigation Measure for BIO-1)

Project-related activities shall occur outside of the bird breeding season (generally between ~~February 1~~ January 1 through ~~August 31~~ September 15) to the extent practicable. If construction must occur within the bird breeding season, no more than ~~three~~ seven days prior to initiation of ground-disturbing activities (including, but not limited to site preparation, grading, excavation, and trenching) within the proposed project site, a bird pre-construction bird nest survey shall be conducted by a qualified biologist within the disturbance footprint plus a 100-foot buffer (300-foot for raptors), where feasible.

Pages 4.3-10 through 4.3-12 (Section 4.3.3, Impact Analysis for Bio-2, Bio-3, Bio-4, and Bio-6)

Significance After Mitigation

Impacts would be less than significant without mitigation

Page 4.3-11 (Section 4.3.3, Impact Analysis for Bio-5)

There are ~~ten~~ eight City protected coast live oak and two City protected landmark California sycamore trees present on the proposed project site. Proposed project activities, including demolition of existing vacant structures, and grading and excavation on site would require the ~~ten~~ three coast live oak trees be removed. ~~Additionally, grading impacts would encroach within 30 percent and 60 percent, respectively, of the Tree Protection Zone of the two California sycamore trees that could lead to mortality. Impacts to the protected oak and landmark California sycamore trees would be considered a significant impact without mitigation.~~ Potentially significant impacts to protected trees would be mitigated to less than significant levels by implementation of Mitigation Measure BIO-2.

Page 4.3-11 (Section 4.3.3, Mitigation Measures for BIO-2)

- In accordance with the City of Thousand Oaks Tree Protection Guidelines the oak trees on the project site that would be removed shall be replaced at a ratio of 3:1 with two 24-inch box coast live oak trees and one 36-inch or 60-inch box coast live oak tree. ~~Six~~ Three coast live oak trees will be removed; therefore, ~~18~~ nine coast live oak trees shall be planted onsite.
- ~~•~~ An arborist shall conduct an inspection of diseases, pests or pathogens prior to protected tree removal and any infected trees be disposed using best available management practices relevant for each tree disease observed.
- All mitigation oak and landmark trees shall be monitored annually for a period of 5 years following installation. All mitigation oak trees shall be in good-to-excellent health at the end of the 5 year monitoring period and any trees that die or are in fair-to-poor health at the end of the 5 year monitoring period must be replaced with a healthy tree, and the replacement tree(s) shall be monitored for a period of 5 years until every mitigation tree is in good-to-excellent health 5 years after installation.
- ~~A 63 percent encroachment into the protective zone (i.e., an area extending from the trunk to 5 feet from the edge of canopy [dripline]) of California sycamore tree #6 is proposed. The tree is not expected to survive this amount of impact. This tree shall be replaced onsite or at~~

~~a City-approved offsite location determined and approved by the Community Development Director prior to issuance of a grading permit with one 24-inch box California sycamore tree.~~

- ~~A 30 percent encroachment into the protective zone of California sycamore tree #7 is proposed. It is unknown if the tree would survive this amount of encroachment; therefore, an ISA certified arborist with a current ISA Tree Risk Assessment Qualification (TRAQ) shall conduct a Level 2 Basic Tree Risk Assessment and/or Level 3 Advanced Tree Risk Assessment to inspect the tree immediately following the completion of grading to determine the tree's likelihood of failure by assigning a risk rating of imminent, probable, possible, or improbable. If the risk rating for tree failure is determined to be "imminent" or "probable", the tree shall be removed and replaced onsite or at an offsite location determined and approved by the Community Development Director prior to issuance of a grading permit. Due to the large size of this California sycamore tree (45-inch cumulative trunk diameter and 45-foot canopy spread), this tree shall be replaced with two 24-inch box and one 36-inch box California sycamore trees. If the arborist determines the risk rating for tree failure to be "possible" or "improbable" with an unlikely likelihood of impacting a target and low consequence of failure, the tree shall be retained and preserved in perpetuity and no replacement trees would be required.~~

Cultural and Tribal Resources

Page 4.4-i (Table of Contents)

Page 4.4-1

4.4 Cultural and Tribal Resources

This section analyzes the cultural resource impacts associated with the proposed project, including regulatory and existing environmental setting, threshold of significance, methodology, and mitigation measures, as needed. The following discussion and analysis include findings about tribal cultural resources from the Phase I Cultural Resource Assessment prepared by Envicom Corporation (Envicom) in December 2021 and revised January 2022 (Envicom 2021, 2022). Additionally, the discussion and analysis contained herein is informed by tribal consultation completed between the City and Native American tribes in the vicinity of the project site. ~~This analysis is based on the Phase I Cultural Resources Assessment prepared for the project by Envicom Corporation (Envicom) in December 2021 and updated January 2022 (Envicom 2021, 2022). The findings of this report are summarized in this section, and the report is provided in Appendix D.~~

Page 4.4-1 (Section 4.4.1, Setting)

The prehistoric and historic setting of the project site are discussed further below**.** Also, the project site lies within three ethnographic tribal territories including the Ventureño Chumash, Gabrieleño-Tongva, and Fernandeño Tataviam.

Page 4.4-1 (Section 4.4.1, Prehistoric Setting)

The prehistoric chronological sequence for southern California presented below is a composite based on Wallace Wallace (1955) and Warren (1968), as well as later studies, including Koerper and Drover (1983).

Pages 4.4-9 and 4.4-10(Section 4.4.2, Regulatory Setting, State Regulations)

Assembly Bill 52

As of July 1, 2015, California Assembly Bill (AB) 52 was enacted and expands CEQA by defining a new resource category: Tribal Cultural Resources (TCR). AB 52 establishes that "a project with an effect that may cause a substantial adverse change in the significance of a TCR is a project that may have a significant effect on the environment" (Public Resources Code (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 TCR, when feasible (PRC Section 21084.3).

PRC Section 21074(a)(1)(A) and (B) defines TCRs as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe" and requires that they meet either of the following criteria:

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).
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 Section5024.1. 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 TCRs. The consultation process must be completed before a CEQA document can be certified. 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 that have requested notice of projects proposed in the jurisdiction of the lead agency are to be included in the process. As of the date of publication of this Draft EIR, the Town of Windsor and the Federated Indians of Graton Rancheria (FIGR) are continuing to engage in the AB 52 Tribal consultation process.

Senate Bill 18

California Government Code Section 65352.3 (adopted pursuant to the requirements of Senate Bill [SB] 18) requires local governments to contact, refer plans to, and consult with tribal organizations prior to making a decision to adopt or amend a general or specific plan. The tribal organizations eligible to consult have traditional lands in a local government's jurisdiction, and are identified, upon request, by the Native American Heritage Commission (NAHC). As noted in the California Office of Planning and Research's Tribal Consultation Guidelines (2005), "The intent of SB18 is to provide California Native American tribes an opportunity to participate in local land use decision sat an early planning stage, for the purpose of protecting, or mitigating impacts to, cultural places."

Codes Governing Human Remains

The disposition of human remains is governed by Health and Safety Code Section 7050.5 and PRC Sections 5097.94 and 5097.98 and falls within the jurisdiction of the NAHC. If human remains are discovered, the County Coroner must be notified within 48 hours and there should be no further disturbance to the site where the remains were found. If the remains are determined by the coroner to be Native American, the coroner is responsible for contacting the NAHC within 24 hours. The NAHC, pursuant to PRC Section 5097.98, will immediately notify those persons it believes to be most likely descended from the deceased Native Americans so they can inspect the burial site and make recommendations for treatment of the remains and associated grave goods.

California Public Resources Code Section 5097.98

PRC Section 5097.98 states that the NAHC, upon notification of the discovery of Native American human remains pursuant to Health and Safety Code Section 7050.5, shall immediately notify those persons (i.e., the Most Likely Descendant or "MLD") it believes to be descended from the deceased. With permission of the landowner or a designated representative, the MLD may inspect the remains and any associated cultural materials and make recommendations for treatment or disposition of the remains and associated grave goods. The MLD shall provide recommendations or preferences for treatment of the remains and associated cultural materials within 48 hours of being granted access to the site.

Page 4.4-14 (Section 4.4.3 Impact Analysis, Tribal Consultations)

Tribal Consultations

Potential impacts on tribal cultural resources are analyzed based on the potential for the project to impact any tribal cultural resources during construction or operation. The significance of a tribal cultural resource and subsequent significance of any impact is determined by, among other things, consideration of whether or not that resource has heritage value to California Native Americans. Further, this impact analysis is also based on consultations with the interested tribal organizations.

The City contacted the Native American Heritage Commission (NAHC) to request an SB 18 consultation list of tribes with traditional lands or cultural places within the project area. On July 22, 2021, the NAHC responded with a list of tribal contacts. Additionally, Envicom contacted the NAHC on September 16, 2021, to request a search of the Sacred Lands File (SLF) and a contact list of Native Americans culturally affiliated with the project site. A response was received from the NAHC on October 19, 2021, stating the SLF search had been completed with "negative" results.

On December 23, 2021, the City distributed AB 52 and SB 18 consultation letters for the proposed project which included project information and a map to 12 Native American tribes identified by the NAHC as having interest in the project area (Appendix D).

- Barbareño/Ventureño Band of Mission Indians
- Chumash Council of Bakersfield
- Coastal Band of the Chumash Nation
- Northern Chumash Tribal Council
- San Luis Obispo County Chumash Council

- Santa Ynez Band of Chumash Indians
- Fernandeño Tataviam Band of Mission Indians
- Gabrieleño Band of Mission Indians – Kizh Nation
- Gabrielino-Tongva Indians of California Tribal Council
- Gabrielino-Tongva Nation
- Gabrieleño-Tongva San Gabriel Band of Mission Indians
- Gabrielino-Tongva Tribe

During the 60-day period to request consultation under AB 52, one request for formal consultation was received from the Fernandeño Tataviam Band of Mission Indians. The information and recommendations which resulted from discussions with the Fernandeño Tataviam Band of Mission Indians is below.

To date, there have been no requests for formal consultation under SB 18. However, as of the date of this EIR, the period to request consultation has not elapsed. The 90-day SB 18 consultation period ends on April 6, 2022.

On January 7, 2022, Jairo Avila of the Fernandeño Tataviam Band of Mission Indians requested formal AB 52 consultation, as well as grading/excavation plans, geotechnical report, and the cultural resources assessment previously prepared for the project. The requested documents were provided by the City to Mr. Avila on January 14, 2022. Mr. Avila requested an AB 52 consultation meeting to discuss the project, cultural resources assessment, and tribal concerns on January 17, 2022. The City responded to Mr. Avila on January 20, 2022, with a list of five potential dates and times for the consultation meeting. On January 20, 2022, Mr. Avila confirmed a date of February 1, 2022, for the consultation meeting. During the consultation meeting, Mr. Avila stated that the project site is located within a transitional area for the Tribe and no tribal cultural resources are known to exist within the project site; however, there is a high number of cultural sites in the area and two are known to exist within a 0.25-mile radius of the project site. Mr. Avila requested details of the proposed cut and/or fill within the southeast portion of the project site, maximum depth of excavation as well as soils and grading before providing additional comments. Mr. Avila requested that the Fernandeño Tataviam Band of Mission Indians be contacted in the event cultural resources are identified during project construction so the Tribe may consult on the treatment of the find. Mr. Avila also requested a list of entitlements required for the project, which was provided by the City on February 1, 2022. On February 1, 2022, February 14, 2022, and February 23, 2022, the City requested written comments from Mr. Avila regarding any issues, questions, or concerns, including mitigation measures mentioned during the consultation meeting for the proposed project. To date, a written response has not been received from Mr. Avila.

On January 13, 2022, Kelsie Shroll, Administrative Assistant for the Santa Ynez Band of Chumash Indians Tribal Elders' Council, indicated no further consultation for the project was necessary.

AB 52 and SB 18 consultation between the City and California Native American tribes is included in Appendix D.

Pages 4.4-15 and 4.4-16 (Section 4.4.3 Impact Analysis, Significance Thresholds)

As set forth in Appendix G of the CEQA Guidelines, a project could have a potentially significant impact to cultural and tribal resources if it would:

- Cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC Section 21074 as either a site, feature, place, 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:
  a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC Section 5020.1(k)
  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 PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe (Threshold 4)

Page 4.4-17 (Section 4.4.3, Impact Analysis for CUL-1)

Mitigation Measures

~~No impacts to historic resources would occur and mitigation would not be required.~~

No mitigation measures are required.

Pages 4.4-19 and 4.4-20 (Section 4.4.3, Impact Analysis for CUL-4)

Threshold 4:	Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC Section 21074 as either a site, feature, place, 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:
	Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC Section 5020.1(k), or
	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 the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

IMPACT CUL-4 PROJECT RELATED GROUND DISTURBING ACTIVITIES COULD RESULT IN IMPACTS TO PREVIOUSLY UNIDENTIFIED TRIBAL CULTURAL RESOURCES. IMPLEMENTATION OF MITIGATION MEASURES CUL-1 AND CUL-2 WOULD REDUCE IMPACTS TO TRIBAL CULTURAL RESOURCES TO A LESS THAN SIGNIFICANT LEVEL.

The project site has been previously developed and ground disturbing activities have already occurred. As of the date of this EIR, no tribal cultural resources have been identified on the project site. However, additional grading and other project-related ground-disturbing activities may encounter previously undiscovered cultural resources of Native American origin that could be considered tribal cultural resources. Project-related ground disturbing activities include the demolition of an existing one-story 103,670-square foot (sf) commercial structure, an attached one-story, 12,512-sf commercial building, a 2,600-sf fast food drive-thru restaurant, a surface parking lot, landscape planters, and existing vegetation, as well as the construction of a mixed-use, multi-family development consisting of 420 dwelling units with associated neighborhood commercial-serving restaurant and retail uses.

The activities resulting from implementation of the proposed project, including construction-related and earth-disturbing actions, could damage or destroy undiscovered tribal cultural resources on-site. As a result, impacts to tribal cultural resources would be potentially significant, requiring mitigation to ensure documentation of known archaeological sites, monitoring for unknown sites during construction, and continued consultation with local Native American tribes if resources of Native American origin are unearthed during construction.

Mitigation Measures

The City has complied with the requirements of AB 52 and SB 18 for sending notifications for requests for formal consultation with tribes affiliated with the project site. Implementation of Mitigation Measures CUL-1 and CUL-2, detailed in Section 4.3.3, Cultural Resources, is required to reduce the potential impact to previously unidentified tribal cultural resources on the project site to a less than significant level.

Significance After Mitigation

Implementation of Mitigation Measures CUL-1 and CUL-2 would reduce potential impacts to tribal cultural resources to a less than significant level.

Page 4.4-21 (Section 4.4.4 Cumulative Impacts)

Therefore, the project's contribution to cumulative impacts to archaeological resources and human remains would not be cumulatively considerable ~~Therefore, significant cumulative impacts to cultural resources would not occur as a result of the project~~.

The geographic scope for considering cumulative impacts to tribal cultural resources is based on the ethnographic use patterns of the project site and surrounding region. For the ethnographic period, the geographic extent includes the tribal territories traditionally occupied by the Ventureño Chumash, Gabrieleño-Tongva and Fernandeño-Tataviam. Past, present, and reasonably foreseeable projects in and around the city of Thousand Oaks could cumulatively contribute to the loss of tribal cultural resources. Impacts to tribal cultural resources are generally site-specific. As with the project, other cumulative development that would result in potential impacts to tribal cultural resources would be subject to applicable federal and state laws, and local goals and policies. Accordingly, as required under applicable laws and regulations, potential impacts associated with cumulative developments would be addressed on a case-by-case basis.

The proposed project would not result in the loss of any known archaeological or historical resources; however, the proposed project could incrementally contribute to the cumulative loss of tribal cultural resources if resources are found on-site during construction. Compliance with AB 52 and, if applicable SB 18, as well as continued involvement by local Native American groups in regional planning would generally limit the destruction of tribal cultural resources such that cumulative impacts would be less than significant. Implementation of Mitigation Measures CR-1 and CR-2 would reduce potential impacts if tribal cultural resources are discovered. With the implementation of these measures the project would not contribute substantially to the cumulative loss of tribal cultural resources.

Therefore, the project would result in a less than significant cumulative impact to cultural and tribal resources.

Energy

Pages 4.5-10 and 4.5-11 (Section 4.5.3, Impact Analysis for E-1 and E-2)

Mitigation Measures

No mitigation measures are required.

Significance After Mitigation

Impacts would be less than significant without mitigation

Page 4.5-12 (Section 4.5.4, Cumulative Impacts)

Additionally, residents of the proposed project have been anticipated under Southern California Association of Government (SCAG) population, housing and growth projections ~~for ?????,~~ and would not represent new energy demands within the region.

Geology and Soils

Page 4.6-1 (Section 4.6.1 Setting, Groundwater)

Additionally, as discussed in Section 4.8~~7~~, *Hazards and Hazardous Materials,* soil borings conducted by Partner Engineering and Science, Inc. (Partner 2018; Partner 2019; Partner 2021) as part of the Phase I and Phase II Environmental Site Assessments also concluded that no groundwater was encountered during the investigation.

Page 4.6-2 (Section 4.6.1 Setting, Expansive Soils)

One of the geotechnical concerns evaluated at the proposed project site noted by Twining in 2005~~4~~ and subsequently Gorian in 2021, is the expansion potential of the near surface soils.

Page 4.6-12 (Section 4.6.3 Impact Analysis for GEO-1)

Significance After Mitigation

Impacts would be less than significant impact without mitigation.

Pages 4.6-14 and 4.16-15(Section 4.6.3 Impact Analysis for GEO-3, Impact GEO-4, and Impact GEO-5)

Mitigation Measures

~~Mitigation measures are not required.~~ No mitigation measures are required.

Pages 4.6-17 and 4.6-18 (Section 4.6.3 Impact Analysis for GEO-8)

Threshold 5:	Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

IMPACT GEO-8 FUTURE DEVELOPMENT ON THE PROPOSED PROJECT SITE WILL BE SUFFICIENTLY SERVED BY EXISTING INFRASTRUCTURE. SEPTIC SYSTEMS AND ALTERNATIVE WASTEWATER DISPOSAL SYSTEMS WILL NOT BE REQUIRED AND THERE WOULD BE NO IMPACT.

The proposed project is an urban infill site which would be served by existing infrastructure. The development proposed project is not anticipated to include the use of septic systems. Therefore, there would be no impact related to the use of septic tanks or alternative wastewater disposal systems.

Mitigation Measures

No mitigation measures are required.

Significance After Mitigation

There would be no impact without mitigation.

Page 4.6-18 (Section 4.6.3 Impact Analysis for GEO-9)

Threshold ~~5~~6:	Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

IMPACT GEO-9 DEVELOPMENT FACILITATED BY THE PROPOSED PROJECT HAS THE POTENTIAL TO DESTROY PREVIOUSLY UNDISCOVERED PALEONTOLOGICAL RESOURCES. IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED.

Therefore, impacts to paleontological resources would be less than significant with mitigation as well as adherence to Policy CO~~)~~-37.

Greenhouse Gas Emissions

Pages 4.7-17 and 4.7-25 (Section 4.7.3 Impact Analysis for GHG-1 and GHG-2)

Mitigation Measures

No mitigation measures are required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Page 4.7-17 (Section 4.7.3 Impact Analysis for GHG-2)

IMPACT GHG-~~1~~2 THE PROPOSED PROJECT WOULD BE CONSISTENT WITH STATEWIDE PLANS, POLICIES AND REGULATIONS, GENERAL PLAN POLICIES, SCOPING PLAN AND MAJOR GOALS OF SCAG'S 2016-2040 RTP/SCS AIMED AT REDUCING GHG EMISSIONS. AS SUCH, THE PROPOSED PROJECT WOULD NOT CONFLICT WITH AN APPLICABLE PLAN, POLICY, OR REGULATION ADOPTED FOR THE PURPOSE OF REDUCING THE EMISSIONS OF GHGS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Hazards and Hazardous Materials

Page 4.8-3 (Section 4.8.1 Setting, Existing and Past Hazardous Materials at the Project Site)

The information related to existing and past uses at the project site and the presence of hazardous materials in this section is based on the 2018 Phase I ESA, 2019 Phase I ESA, 2021 Phase II ESA, and 2022 Additional Soil Gas Investigation reports prepared by Partner, the earlier reports

referenced by Partner, and the 2021 Hazardous Materials Report prepared by Stantec for the project site (see ~~Appendices F1, F2, F3 and F4).~~ Appendix F).

Page 4.8-5 (Section 4.8.1 Setting, Potential Regional Hazards)

As detailed in Section 4.16~~7~~, Wildfire, the project site is located adjacent to Very High Fire Hazard Severity Zone (VHFHSZ) and within the Wildland-Urban Interface (WUI).

Page 4.8-5 (Section 4.8.3 Impact Analysis, Methodology and Significance Thresholds)

As analysis of potential impacts related to wildland fires is covered in detail in Section 4.16~~7~~, *Wildfire;* therefore, discussion of *Hazards and Hazardous Materials* threshold 7 is not included in this section.

Page 4.8-13 (Section 4.8.3 Impact Analysis for HAZ-1, Construction)

As discussed in Section 4.17~~8~~: *Effects Considered Less than Significant,* ~~*Impacts found to be Less Than Significant,*~~ under Hydrology and Water Quality, prior to beginning construction activities on the project site (including demolition), the project proponent would be required to obtain National Pollutant Discharge Elimination System (NPDES) coverage under the California Statewide Construction General Permit (CGP).

Page 4.8-14 (Section 4.8.3 Impact Analysis for HAZ-1, Construction)

Hazardous material transport may occur regularly throughout the construction phase, as materials are brought to and from the project location. Any use and transport of hazardous materials, such as solvents or construction fuels, would comply with all local, State, and federal regulations regarding the handling of potentially hazardous materials, as discussed under Section 4.8~~7~~.2, *Regulatory Setting*, above. Hazardous materials would be transported by DTSC-registered transporters and be required to follow all DOT regulations under the Hazardous Materials Transport Act, in addition to CalEPA and local CUPA regulations regarding hazardous materials transport. In addition, construction activities that transport hazardous materials would be required to transport such materials along designated roadways in the city and county, as discussed under Section 4.8~~7~~.1, *Setting*. Materials transported to and from the project site would be required to reach the closest designated transport route by the shortest path; US-101 is the closest designated route and on-ramps are in the immediate vicinity of the project site.

Page 4.8-15 (Section 4.8.3 Impact Analysis for HAZ-1, Operation)

Any business that may involve the use of hazardous materials would also involve the routine transport of such materials and/or hazardous wastes. As discussed under *Construction* above, and in Section 4.8~~7~~.2, *Regulatory Setting,* such transport is governed by a wide range of regulations including the requirement that it be conducted by transporters registered with DTSC

Pages 4.8-15 through 4.8-23 (Section 4.8.3 Impact Analysis for HAZ-1, HAZ-2, HAZ-4, and HAZ-5)

Significance After Mitigation

Impacts would be less than significant.

Page 4.8-15 (Section 4.8.3 Impact Analysis for HAZ-2)

As described in Section 4. 8~~7~~.1, *Setting*, ~~the Little Dreamers Early Childhood~~ a preschool is located adjacent to the project site immediately to the southwest.

Page 4.8-17 (Section 4.8.3 Impact Analysis for HAZ-3)

Additional Soil Gas Investigation Report performed by Partner and detailed in Section 4.8~~7~~.1, *Setting.* As described above, former uses of the vacant commercial building at 325 Hampshire Road included an automotive center with a known UST and hydraulic lifts and a clarifier which still remain onsite, as well as a dry-cleaning business which operated at the southern end of the property.

As detailed in 4.8~~7~~.1, *Setting*, above, the 2021 and 2022 investigations by Partner uncovered evidence of a subsurface release of chlorinated VOCs commonly associated with dry cleaning in the vicinity of the former dry cleaners, including elevated levels of PCE, benzene, ethylbenzene, and vinyl chloride in soil vapor above residential and commercial/industrial screening levels.

Land Use and Planning

Page 4.9-4 (Section 4.9.2 Regulatory Setting, Thousand Oaks Zoning Regulations)

A specific plan must include text and diagram or diagrams that specify the components (Section 65451 of the California Government Code) that includes distribution, location, and extent of land uses, including open space, within the area covered by the T.O. Ranch Specific Plan and other aspects as may be determined appropriate by the City.

Page 4.9-4 (Section 4.9.2 Regulatory Setting, Guidelines For Development Within the Corridors of the Route 101 and 23 Freeways and Architectural Design Review Guidelines)

The Planning Commission and City C~~c~~ouncil may waive or reduce the standards if the unique configuration of the site prevents reasonable development of the property consistent with such guidelines or when the community benefit of the project justifies such waivers or deviations.

Page 4.9-6 (Section 4.9.3 Impact Analysis for LU-1)

Mitigation Measure

~~No mitigation is required.~~

No mitigation measures are required.

Significance After Mitigation

~~There proposed project would have no additional impacts without mitigation.~~

Impacts would be less than significant without mitigation.

Page 4.9-12 (Section 4.9.3 Impact Analysis for LU-2)

Mitigation Measure

~~No mitigation is required.~~

No mitigation measures are required.

Page 4.9-13 (Section 4.9.4 Cumulative Impacts)

4.9.4 Cumulative Impacts

~~Cumulative Impacts and Mitigation Measures~~

The General Plan attempts to facilitate growth complimentary to adjacent land uses. Projects that can divide communities, such as new freeways, have long been recognized as an adverse effect on neighborhoods. Therefore, the General Plan attempts to avoid such development in areas of established communities. The T.O. Ranch Specific Plan would not divide established communities and would have no cumulative contribution to impacts on dividing established communities.

Individual projects envisioned in the General Plan would also be evaluated for consistency with the County General Plan policies that avoid or mitigate environmental effects at the time they are proposed and evaluated pursuant to CEQA. As described above, the proposed project would conflict with some policies pertaining to noise. However, the T.O. Ranch Specific Plan would generally be in harmony with the General Plan when taken as a whole. Cumulative impacts would be less than significant.

Noise

Page 4.10-3 (Section 4.10.1 Setting, Existing Noise Environment)

The most common source of noise in the project site vicinity is vehicular traffic on the US-101 and Hampshire Road, as well as commercial use noise (parking and garbage pickups) and activity at the preschool ~~(Little Dreamers Early Childhood)~~.

Page 4.10-5 (Section 4.10.1 Setting, Table 4.10-1 Project Site Vicinity Sound Level Monitoring Results)

Measurement	Location	Sample Times	Approximate Distance to Primary Noise Source	L_{eq} (dBA)	Noise Sources
ST-4	East of ~~Little Dreamers Early Childhood~~ Preschool, in line with south façade	11:12a.m.-11:27a.m. 10/06/2021	Southwest portion of the project site	47.3	Distant US-101and occasional Hampshire Road traffic and preschool activity

Page 4.10-11 (Section 4.10.3 Impact Analysis For NOI-1 Construction Impacts)

The average noise levels from construction equipment at the closest sensitive receiver location, which is the ~~Little Dreamers Early Childhood~~ preschool, as well as other nearby sensitive receivers, are shown below in Table 4.10-4. These noise levels are based on the previously described RCNM with an individual piece of construction equipment operating at the edge of construction activity.

Based on the noise levels in Table 4.10-4, when concrete saws operate near the project boundary construction activity noise levels would reach 93.5 dB Leq, which would occur at the ~~Little Dreamers Early Childhood~~ preschool.

Page 4.10-12 (Section 4.10.3 Impact Analysis for NOI-1, Construction Impacts, Table 4.10-4 Construction Equipment Noise Levels at Nearest Sensitive Receivers)

Receiver	Phase	Equipment	Leq at 50 feet (dB) [1]	Distance (ft) [2]	Construction Equipment Noise Level (dB L_{eq})	Existing Ambient Noise Level (dB L_{eq})	With Project Construction Noise Level (dB L_{eq})	Project Construction Related Noise Increase (dB)	Significant Increase?
~~Little Dreamers Early Childhood~~ Preschool	Demolition	Concrete Saw	83	15	93	47.3	93.5	46.2	Yes
		Dozer	78	15	88	47.3	88.5	41.2	Yes
		Excavator	77	15	87	47.3	87.5	40.2	Yes
	Site Preparation	Dozer	78	15	88	47.3	88.5	41.2	Yes
		Backhoe	74	15	84	47.3	84.5	37.2	Yes

Page 4.10-18 (Section 4.10.3 Impact Analysis Mitigation Measures For NOI-1 Construction Noise Reduction Measures)

Based on areas of construction noise impacts, the ~~Little Dreamers Early Childhood~~ preschool, the Windsor Terrace of Westlake Village convalescent home, the single-family residences and multifamily communities to the west (along Foothill Drive, south of Fairview Road), and the Westlake Villas apartment community to the south shall be informed via mail and posting at the site of the anticipated start date, duration, noise impact, and other pertinent information prior to the construction of the project.

Page 4.10-22 (Section 4.10.3 Impact Analysis For NOI-1 Table 4.10-7 HVAC Noise Levels at Off site Land Uses)

Receiver	Location	Number of Units	Combined Noise Level (dBA L_{eq})[1]	Average Distance to Receiver (ft)	Parapet/ Roofline Reduction (dBA)[2]	Noise Level (dBA L_{eq})	Noise Level (dBA CNEL)[3]
~~Little Dreamers Early Childhood~~ Preschool	Southwest of site	5	73	95	0	44	55
		6	74	101	0	44	
		6	74	169	0	40	
		6	74	168	0	40	

Pages 4.10-23 through 4.10-32 (Section 4.10.3 Impact Analysis for NOI-1, Operational Impacts and Off site Traffic Noise Increases and Impact NOI-3)

Mitigation Measures

No mitigation measures are required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Page 4.10-27 (Section 4.10.3 Impact Analysis For NOI-2)

In addition, vibration levels at the ~~Little Dreamers Early Childhood~~ preschool and the Windsor Terrace of Westlake Village convalescent home would be strongly perceptible when large bulldozers operate close to the construction boundary and vibration annoyance could occur.

Page 4.10-28 (Section 4.10.3 Impact Analysis For NOI-2, Table 4.10-10 Groundborne Vibration from Project Construction Equipment and)

			Attenuated Vibration Levels at Nearest Residence		Vibration Damage Impact Assessment		Vibration Annoyance Impact Assessment	
Receiver	Construction Equipment	Reference Vibration Levels (in/sec PPV at 25 ft)	Distance(ft)	in/sec PPV	Potential Damage Threshold (in/sec PPV)	Exceedance?	Potential Annoyance Threshold (in/sec PPV)	Exceedance?
~~Little Dreamers Early Childhood~~ Preschool (South)	Pile Driver (sonic) [1]	0.170	270 [2]	0.005	0.5	No	0.1	No
	Loaded Trucks	0.076	25 [3]	0.076	0.5	No	0.1	No
	Large Bulldozer	0.089	15 [4]	**0.191**	0.5	No	0.1	Yes

Page 4.10-30 (Section 4.10.3 Impact Analysis Mitigation Measures For NOI-2 Construction Equipment Vibration Restrictions)

Vibratory pile driving activity within 36 feet of the medical office building shall be scheduled during times outside of its hours of operation. Large bulldozers or similar equipment shall not operate within 24 feet of the ~~Little Dreamers Early Childhood P~~ preschool building, the Windsor Terrace of Westlake Village convalescent home, or the medical office building, with smaller equipment substituted within this distance.

Page 4.10-31 (Section 4.10.3 Impact Analysis Significance after Mitigation For NOI-2, Table 4.10-11 Mitigated Groundborne Vibration from Project Construction Equipment at Nearest Structures)

			Attenuated Vibration Levels at Nearest Residence		Mitigated Vibration Damage Impact Assessment		Mitigated Vibration Annoyance Impact Assessment	
Receiver	Construction Equipment	Reference Vibration Levels (in/sec PPV at 25 ft)	Distance (ft)	in/sec PPV	Potential Damage Threshold (in/sec PPV)	Exceed-ance?	Potential Annoyance Threshold (in/sec PPV)	Exceed-ance?
~~Little Dreamers Early Childhood~~ Preschool (South)	Large Bulldozer	0.089	24	0.095	0.5	No	0.1	No

Population and Housing

Page 4.11-3 (Section 4.11.1 Setting, Population, Housing, and Employment Projections)

This analysis assumes buildout of the proposed project would occur in a 10- to 15-year time frame following adoption of the T.O. Ranch Specific Plan, and therefore uses the current Thousand Oaks Housing Element and SCAG year 2040 projections for comparison with the project.

Pages 4.11-6 and 4.11-7 (Section 4.11.2 Regulatory Settings, City of Thousand Oaks General Plan)

City of Thousand Oaks General Plan

~~The 2020-2040 General Plan was prepared pursuant to State law to guide future development and to identify the community's environmental, social, and economic goals and functions as a blueprint that defines how the city will evolve through 2040. The General Plan sets forth goals, objectives, and programs to provide a guideline for day-to-day land use policies and to meet the existing and future needs and desires of the community, while at the same time integrating a range of State-mandated elements including Land Use, Transportation, Noise, Safety, Housing, and Open Space/Conservation.~~

Pages 4.11-9 and 4.11-10 (Section 4.11.3 Impact Analysis for POP-1 and POP-2)

Mitigation Measures

~~No mitigation is required.~~

No mitigation measures are required.

Public Services

Page 4.12-8 (Section 4.12.3 Impact Analysis for PS-1)

Mitigation Measures

~~No mitigation is required.~~

No mitigation measures are required.

Page 4.12-10 (Section 4.12.3 Impact Analysis for PS-4)

Significance After Mitigation

Impacts would be less than significant without mitigation.

Recreation

Page 4.13-1 (Section 4.13.1 Setting)

As discussed in Section 2, Project Description, the proposed project would redevelop the site which currently contains a former K-mart building and ancillary uses but is otherwise vacant, other than intermittent and temporary seasonal uses (Christmas tree lot).

Page 4.13-1 (Section 4.13.1 Setting, Parks and Open Space)

"Open space" is also a designation in the City of Thousand Oaks (Thousand Oaks, city) land use classification system. Figure 4.13-1, below, shows the location of the various parks and open spaces throughout the city.

Page 4.13-7 (Section 4.13.3 Impact Analysis, Project Design Features)

As described in Section 2, Project Description, the proposed project would include 126,932 square feet (sf) of public open space (including a dog park, a seating garden, paseos, and trail connections), 40,786 sf of shared open space, and 29,800 sf of private residential open space, equating to a total of 203,172 sf (4.7 acres) of open space.

Page 4.13-9 (Section 4.13.3 Impact Analysis for REC-1, Operations)

The proposed project would involve the phased demolition of the existing uses on the site and would introduce 420 new residential units and 15,000 sf of commercial and restaurant uses (see Figure 4.13 1).

Mitigation Measures

~~Mitigation measures are not required.~~

No mitigation measures are required.

Significance After Mitigation

~~The impact would be less than significant without mitigation.~~

Impacts would be less than significant without mitigation.

Page 4.13-12 (Section 4.13.3 Impact Analysis for REC-2)

Mitigation Measures

~~Mitigation measures are not required.~~

No mitigation measures are required.

Significance After Mitigation

~~There proposed project would have no additional impacts without mitigation.~~

Impacts would be less than significant without mitigation.

Transportation and Traffic

Page 4.14-1 (Section 4.14.1 Setting, Existing Street Network)

The proposed project is generally surrounded by Ventura Freeway (U.S. 101) to the north, Hampshire Road to the east, and Foothill Drive to the south and west. Other roadways in the vicinity of the proposed project include Willow Lane, a two-lane frontage road located north of the proposed project, Thousand Oaks Boulevard, an arterial located north of the proposed project, and Westlake Boulevard (State Route [~~S.R.~~] 23), located south of the proposed project.

Page 4.14-2 (Section 4.14.1 Setting, Existing Street Network)

Willow Lane is a two-lane undivided roadway, oriented in a northwest-southeast direction, running parallel to U.S. 101 within the study area.

Page 4.14-4 (Section 4.14.1 Setting, Public Transit)

The nearest bus stop to the proposed project is located ~~at the intersection of Hampshire Road and Thousand Oaks Boulevard, 0.4 mile northeast of the site, serviced by Commuter Express 422.~~ on the corner of Hampshire Road and Foothill Drive adjacent to the project site, serviced by Commuter Express 423. ~~Another~~ Other nearby bus stops ~~is~~ are located at the intersection of Hampshire Road and Thousand Oaks Boulevard, 0.4 mile northeast of the site, serviced by Commuter Express 422, and at the intersection of Duesenberg Drive and Thousand Oaks Boulevard, 0.8 mile northeast, serviced by TOT Route 43. Route 43 covers Thousand Oaks Boulevard and Westlake areas.

Page 4.14-2 (Section 4.14.3 Impact Analysis for TRA-1)

The proposed project would not conflict or be inconsistent with the SCAG 2020-2045 RTP/SCS Goals or the Thousand Oaks ATP. However, as discussed under Impact LUP-2 in Section 4.9~~8~~, *Land Use and Planning*, and Section 2, *Project Description*, the proposed project is currently inconsistent with the existing General Plan land use designation of "Commercial," as the "Commercial" designation does not allow for residential or mixed-uses.

Utilities and Service Systems

Page 4.15-3 (Section 4.15.1 Setting, Groundwater)

Both wells tap into the Conejo Valley Groundwater Basin (CVGB or Basin) in different locations; however, local groundwater quality poses a major constraint on their use this is discussed further in Section 4.17~~8~~, *Effects Considered Less Than Significant*, Hydrology and Water Quality (UWMP 2020).

Page 4.15-3 (Section 4.15.1 Setting, Water Supply and Demand)

The 2020 UWMP projects it's total supply demand through the year 2045 to be ~~with a total projection of 11,805~~ between 26,593 and 26,595 acre-feet per year (AFY) total under normal and single-dry year conditions with purchased or imported water through the Calleguas Municipal Water District (CMWD). The CMWD has confirmed that it anticipates having sufficient supplies to meet City imported water demands through 2045 and in fact shows surplus supplies in all water year types (UWMP 2020). Table 4.15-2 through Table 4.15-5depict forecast water supplies under normal, single dry year, and multiple dry year conditions. The UWMP projects that, under non-drought conditions, MWD purchased water will increase to ~~11,004~~ 118,906 by 2040 (see Table 4.15-2). The CMWD projects the minimum available annual water supply for a scenario involving multiple dry years for the first year is estimated at 26,568 AFY in 2040, as shown in Table 4.15-4(UWMP 2020).

Pages 4.15-4 and 4.15-5 (Section 4.15.1 Setting, Tables 4.15-2 UWMP Normal Year Supply and Demand Comparison (AFY) and 4.15-3 UWMP Single Dry Year Supply and Demand Comparison (AFY)

Table 4.15-2 UWMP Normal Year Supply and Demand Comparison (AFY)

~~Sources~~	~~2025~~	~~2030~~	~~2035~~	~~2040~~	~~2045~~
~~Purchased or Imported Water~~	~~10,191~~	~~10,462~~	~~10,733~~	~~11,004~~	~~11,275~~
~~**Total Existing Supplies**~~	~~**10,191**~~	~~**10,462**~~	~~**10,733**~~	~~**11,004**~~	~~**11,275**~~
~~Los Robles Desalter~~	~~500~~	~~500~~	~~500~~	~~500~~	~~500~~
~~**Total Supplies**~~	~~**10,691**~~	~~**10,962**~~	~~**11,233**~~	~~**11,504**~~	~~**11,775**~~

Table 4.15-3 UWMP Single Dry Year Supply and Demand Comparison (AFY)

~~Sources~~	~~2025~~	~~2030~~	~~2035~~	~~2040~~	~~2045~~
~~Purchased or Imported Water~~	~~10,191~~	~~10,462~~	~~10,733~~	~~11,004~~	~~11,275~~
~~**Total Existing Supplies**~~	~~**10,191**~~	~~**10,462**~~	~~**10,733**~~	~~**11,004**~~	~~**11,275**~~

~~Sources~~	~~2025~~	~~2030~~	~~2035~~	~~2040~~	~~2045~~
~~Los Robles Desalter~~	~~500~~	~~500~~	~~500~~	~~500~~	~~500~~
~~**Total Supplies**~~	~~**10,691**~~	~~**10,962**~~	~~**11,233**~~	~~**11,504**~~	~~**11,775**~~

Table 4.15-4 UWMP Normal Year Supply and Demand Comparison (AFY)

Sources	2025	2030	2035	2040	2045
Supply Totals	114,187	115,300	117,460	118,906	119,364
Demand Totals	87,541	88,665	90,846	92,307	92,769
Difference	**26,646**	**26,635**	**26,614**	**26,599**	**26,595**

Table 4.15-5 UWMP Single Dry Year Supply and Demand Comparison (AFY)

Sources	2025	2030	2035	2040	2045
Supply Totals	113,080	114,190	116,346	117,791	118,244
Demand Totals	86,435	87,556	89,734	91,193	91,651
Difference	**26,645**	**26,634**	**26,612**	**26,598**	**26,593**

Page 4.15-13 (Section 4.15.3 Impact Analysis for UTIL-1)

IMPACT UTIL-1 NEW DEVELOPMENT FACILITATED BY THE PROPOSED PROJECT REQUIRES PROPER ASSESSMENT OF ELECTRICITY AND GAS SERVICES BY SOUTHERN CALIFORNIA EDISON AND SOUTHERN CALIFORNIA, IMPACTS WOULD BE LESS THAN SIGNIFICANT. ~~WITH MITIGATION.~~

Further as discussed in Section 4.1~~7~~8, Effects considered Less Than Significant, Hydrology, water, wastewater, stormwater drainage would be addressed by several project components which would serve to increase the overall infiltration and recharge of precipitation and runoff from the site.

Page 4.15-14 (Section 4.15.3 Impact Analysis for UTIL-2)

IMPACT UTIL-2 REGIONAL WATER SUPPLIES ARE ADEQUATE TO SERVE DEVELOPMENT POTENTIAL IMPACTS WOULD BE LESS THAN SIGNIFICANT. ADEQUATE WATER SUPPLIES ARE AVAILABLE TO MEET THE LONG-TERM DEMANDS ASSOCIATED WITH THE PROPOSED PROJECT. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Page 4.15-16 (Section 4.15.4 Cumulative Impacts)

Finally, the project would not generate solid waste in excess of state or local standards, the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals, and the project comply with federal, state, and local solid waste management and reduction statutes. Therefore cumulative impacts would be less than significant.

Wildfire

Page 4.16-1 (Section 4.16.1 Setting, Wildfire Fundamentals)

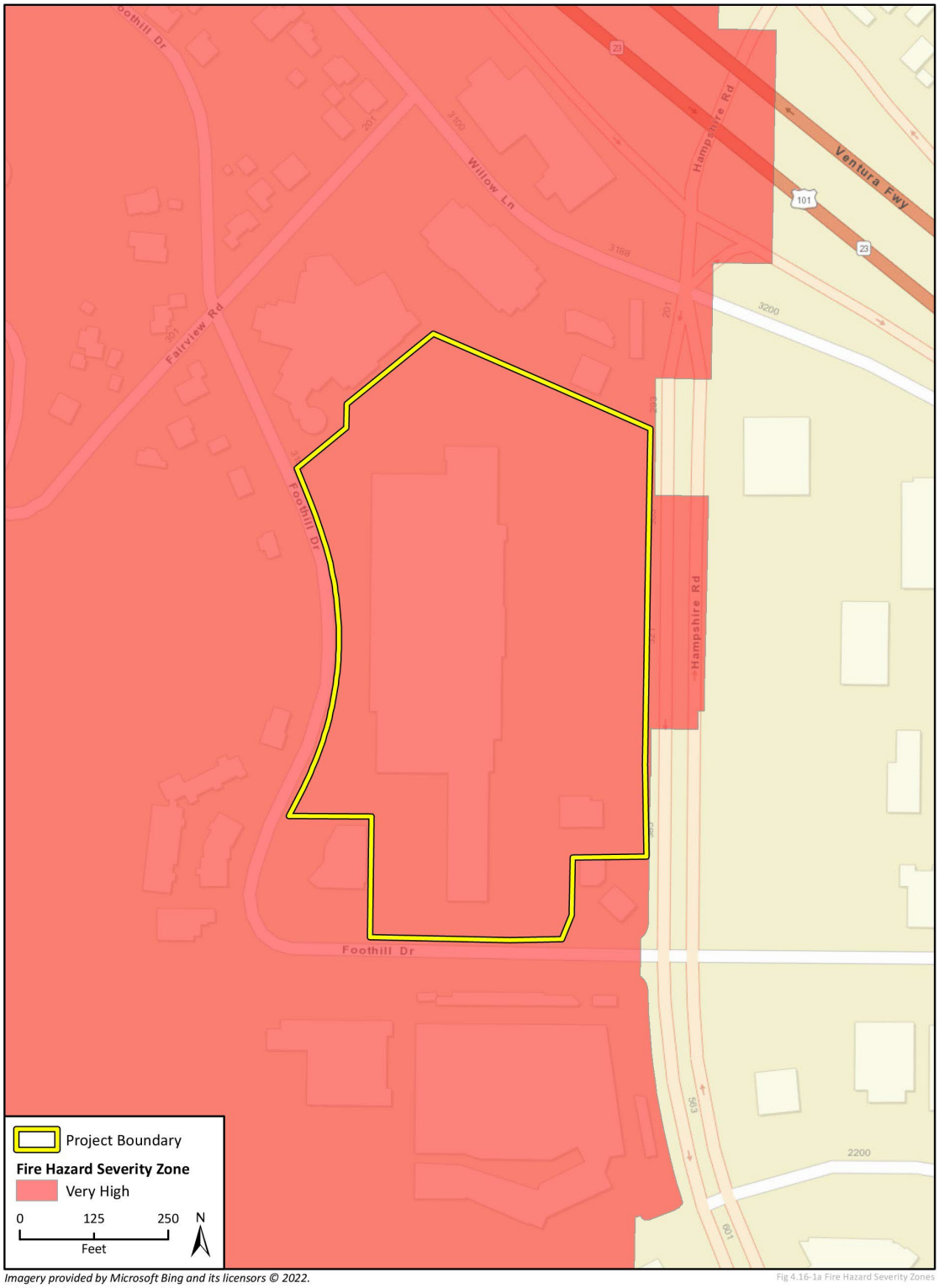
Please see Section 4.7~~6,~~ *Greenhouse Gas Emissions*, for impact analysis and information related to the proposed project greenhouse gas emissions.

Page 4.16-3 (Section 4.16.1 Setting, Wildfire Hazard Designations)

The proposed project site is located in a Very High FHSZ, adjacent to the Conejo Ridge Open Space, as illustrated in Figure 4.16-1 and Figure 4.16-1a.

Page 4.16-5 (Section 4.16.1 Setting, Project Site and Regional Fire Conditions)

Figure 4.16-1.1 Fire Hazard Severity Zone and Project Site



Page 4.16-14-4.16-16 (Section 4.16.3 Impact Analysis for W-1 and W-2)

Mitigation Measures

~~No mitigation is required.~~

No mitigation measures are required.

Significance After Mitigation

~~Impacts would be less than significant.~~

Impacts would be less than significant without mitigation.

Page 4.16-15 (Section 4.16.3 Impact Analysis for W-2, Operation)

As shown in Figure 4.16-1 and Figure 4.16-1a, the Conejo Ridge Open Space is west of Foothill Drive, across from the northwestern project site boundary.

Effects Considered Less Than Significant

Page 4.17-1

The environmental factors discussed below are in response to the checklist questions listed in Appendix G of the CEQA Guidelines that were not discussed in Sections 4.1 through 4.16~~7~~ of the DEIR.

Alternatives

Page 5-1 (Introduction)

The purpose of describing and analyzing a No Project Alternative ~~no project alternative~~ is to allow decision makers to compare the impacts of approving a proposed project with the impacts of not approving the proposed project. If the No Project Alternative ~~no project alternative~~ is the environmentally superior alternative, CEQA requires that the EIR "shall also identify an environmentally superior alternative among the other alternatives" (CEQA Guidelines Section 15126.6(e)(2)).

Page 5-3 (Section 5.3 Attainment of Project Objectives)

Provide ample publicly accessible open space and incorporate native plant species to reduce water usage, provide a landscape demonstration area to visitors, and create a comfortable pedestrian environment.

Page 5-6 (Section 5.6 Alternative 1: No Project, 5.6.2 Impact Analysis, Aesthetics and Visual Resources)

Under the No Project A~~a~~lternative, no rezoning of the project site would occur and therefore no conflicts would occur and impacts would be the same as the proposed project. The current visual quality on the site is low due to the abandoned nature of the existing development and continued non-use would result in ongoing deterioration on the site, that would conflict with the current

General Plan goals that seek to "provide a high-quality environment, healthful and pleasing to the senses, which values the relationship between maintenance of ecological systems and the people's general welfare." Therefore, visual quality would continue to degrade and impacts would be greater than the proposed project. Finally, current light and glare conditions on the site are low because the retail uses and the parking lot are non-operational and under the No Project Aalterative light and glare impacts would be less than the proposed project.

Pages 5-6 and 5-7 (Section 5.6 Alternative 1: No Project, 5.6.2 Impact Analysis, Biological Resources)

The project site is a paved, developed set of parcels with ruderal vegetation and some mature trees. Under the No Project Aalternative, this vegetation would remain in place and continue to be viable habitat for nesting birds.

The arborist survey discovered 10 protected and landmark trees on the project site (see Appendix C). These trees would remain on the site. However, aside from four coast live oaks (tree numbers 3, 4, 8, and 9), the trees on the site are in poor condition and in a state of decline. However, The No Project Alternative would not replace the eight out of 12 City-protected trees that would die from continual decline, nor would it be subject to mitigation to replace or move the healthy trees; therefore, impacts to protected trees would be greater than that of the proposed project.

Page 5-7 (Section 5.6 Alternative 1: No Project, 5.6.2 Impact Analysis, Cultural and Tribal Resources)

Cultural and Tribal Resources

As described in Section 4.43, *Cultural and Tribal Resources*, the existing development on the project site is not considered an historic resource and the archaeological records search indicated no prehistoric resources have been recorded within the project site. Under the No Project Alternative, construction would not occur, which would eliminate potential impacts to previously unidentified archaeological resources and, human remains~~, and tribal cultural resources~~. Therefore, impacts to cultural and~~,~~ historic~~, or tribal~~ resources under the No Project Alternative would be less than the proposed project.

Under the No Project Alternative, the existing development would remain in place and no new excavation would occur. Furthermore, the entire site is paved or developed with an existing shopping center and undeveloped areas do not exist on the site. Therefore, the discovery of tribal cultural resources is unlikely and no impacts would occur under the No Project Alternative. Relative to the proposed project, the No Project Alternative would have equivalent impacts.

Page 5-7 (Section 5.6 Alternative 1: No Project, 5.6.2 Impact Analysis, Energy)

These impacts would be less under the No Project Aa~~lternative~~ than under the proposed project.

Page 5-9 (Section 5.6 Alternative 1: No Project, 5.6.2 Impact Analysis, Land Use and Planning)

Though the proposed project is inconsistent with some General Plan policies, once the General Plan amendment is adopted, the zoning designation for the T.O. Ranch Specific Plan can be adopted and considered consistent.

Page 5-9 (Section 5.6 Alternative 1: No Project, 5.6.2 Impact Analysis, Noise)

Since the No Pproject Alternative would not require any construction, there would be no changes to existing noise levels at the proposed project site.

Page 5-9 (Section 5.6 Alternative 1: No Project, 5.6.2 Impact Analysis, Public Services)

Under the No Project Aalternative, no new residential units would be built and no population growth would be induced.

Page 5-10 (Section 5.6 Alternative 1: No Project, 5.6.2 Impact Analysis, Transportation and Traffic)

Under the No Project Aalternative, transportation and traffic would remain at current conditions. The proposed project is anticipated to generate an average daily residential VMP per capita within the project TAZ that is 29 percent below the citywide average.

Page 5-10 (Section 5.6 Alternative 1: No Project, 5.6.2 Impact Analysis, Tribal Cultural Resources)

~~Under the No Project Alternative, the existing development would remain in place and no new excavation would occur. Furthermore, the entire site is paved or developed with an existing shopping center and undeveloped areas do not exist on the site. Therefore, the discovery of tribal cultural resources is unlikely and no impacts would occur under the No Project Alternative. Relative to the proposed project, the No Project Alternative would have equivalent impacts.~~

Page 5-12 (Section 5.7 Alternative 2: No Project with By Right Development, 5.7.2 Impact Analysis, Air Quality)

Temporary construction-related air quality impacts associated with this Aalternative would be less than as those of the proposed project since the overall amount and duration of construction would be less due to less excavation associated with subterranean parking and taller buildings.

Therefore, during operation, this alAlternative can be reasonably expected generate more daily vehicle trips than the proposed project, on a scale of up to approximately 120 percent, as a direct effect of the single commercial use and the exclusion of residential and other mixed uses.

Pages 5-12 and 5-13 (Section 5.7 Alternative 2: No Project with By Right Development, 5.7.2 Impact Analysis, Cultural and Tribal Resources)

As described in Section 4.43, *Cultural and Tribal Resources*, the existing development on the project site is not considered a historic resource and the archaeological records search indicated no prehistoric resources have been recorded within the project site. Under the Alternative 2, demolition of the existing structures and paved parking area would occur and the construction of new buildings and parking area would involve excavation to existing depths, making discovery of unknown archaeological resources unlikely. However, as a by-right project, Alternative 2 would not be subject to monitoring or other mitigation measures that would apply to the proposed project. ~~and therefore, if such cultural resources discoveries were to occur, impacts could be substantially more than those under the proposed project.~~

~~As described in Section 4.15, Tribal Cultural Resources~~, Additionally grading and other ground-disturbing activities on the site under Alternative 2 could result in impacts to previously unidentified tribal cultural resources.

Page 5-13 (Section 5.7 Alternative 2: No Project with By Right Development, 5.7.2 Impact Analysis, Greenhouse Gas Emissions)

The proposed project's GHG emissions would within the CEQA threshold (see Table 4.7~~6~~-1 of Section 4.7~~6~~, *Greenhouse Gas Emissions*).

Page 5-16 (Section 5.8 Alternative 3: Mixed-Use Project with Reduces Residential Density, 5.8.1 Description)

Like the proposed project, this A~~a~~lternative would also involve demolition of the existing commercial center, paved parking area, and on-site vegetation. It would redevelop the site with a mixed-use plan like that of the proposed project but with only 329 residential units, 91 fewer than the proposed project.

Page 5-16 (Section 5.8 Alternative 3: Mixed-Use Project with Reduces Residential Density, 5.81.2 Impact Analysis, Air Quality)

Temporary construction-related air quality impacts associated with this A~~a~~lternative would be the same as those of the proposed project since the overall amount and duration of construction would be roughly the same, with or without the increased residential density (91 Measure E units).

Page 5-17 (Section 5.8 Alternative 3: Mixed-Use Project with Reduces Residential Density, 5.81.2 Impact Analysis, Cultural and Tribal Resources)

As described in Section 4.4~~3~~, *Cultural and Tribal Resources*, the existing development on the project site is not considered a historic resource and the archaeological records search indicated no prehistoric resources have been recorded within the project site.

Under Alternative 3, demolition of the existing structures and paved parking area would occur, and the construction of new buildings and parking area would involve excavation to depths that could exceed those previously obtained, making discovery of unknown archaeological resources possible. ~~Alternative 3 would be subject to the same monitoring and mitigation as the proposed project and impacts would be the same.~~ Since grading and other ground-disturbing activities on the site under Alternative 3 could result in impacts to previously unidentified tribal cultural resources. As with the proposed project, mitigation measures recommended through the tribal consultation process would also apply to Alternative 3 and impacts would be the same.

Page 5-18 (Section 5.8 Alternative 3: Mixed-Use Project with Reduces Residential Density, 5.81.2 Impact Analysis, Greenhouse Gas Emissions)

The proposed project's GHG emissions would within the CEQA threshold (see Table 4. 4.7~~6~~-1 of Section 4.7~~6~~, *Greenhouse Gas Emissions*) and Alternative 3 would likely generate the same or slightly less GHG emissions due to a design that encourages pedestrian travel and alternative forms of *transportation*.

Page 5-18 (Section 5.8 Alternative 3: Mixed-Use Project with Reduces Residential Density, 5.81.2 Impact Analysis, Land Use and Planning)

No established communities would be divided under the Alternative 3 as new development would occur within the same project footprint as existing development ~~A~~and the site is currently vacant.

Page 5-19 (Section 5.8 Alternative 3: Mixed-Use Project with Reduces Residential Density, 5.81.2 Impact Analysis, Tribal Cultural Resources)

~~a. Tribal Cultural Resources~~

~~As described in Section 4.15, *Tribal Cultural Resources*, grading and other ground-disturbing activities on the site under Alternative 3 could result in impacts to previously unidentified tribal cultural resources. As with the proposed project, mitigation measures recommended through the tribal consultation process would also apply to Alternative 3 and impacts would be the same.~~

Pages 5-20 and 5-21 (Section 5.9 Environmentally Superior Alternative)

Alternative 1 (*No Project)* assumes that the proposed mixed-use development would not be constructed ~~And~~ and the current vacant uses on the project site would remain.

Table 5-2 Impact Comparison of Alternatives

Feature	Proposed Project	Alternative 1: No Project	Alternative 2: No Project with By-Right Development	Alternative 3: Mixed-Use Project with Reduced Residential Density
Aesthetics & Visual Resources	Less than significant	=/-	-	=
Air Quality	Less than significant	+	-	=/+
Biological Resources	Less than significant with mitigation incorporated	-	-	=
Cultural and Tribal Resources	Less than significant with mitigation incorporated	+	-	=
Energy	Less than significant	-	=	=
Geology & Soils	Less than significant with mitigation incorporated	=/+	=	=
Greenhouse Gas Emissions	Less than significant	-	=/+	=/+
Hazards & Hazardous Materials	Less than significant with mitigation	-	=/-	=/-
Land Use and Planning	Less than significant	=	=	=
Noise	Less than significant with mitigation incorporated	+	=	=
Population & Housing	Less than significant	=	+	+
Public Services	Less than significant with mitigation incorporated	+	+	=

Feature	Proposed Project	Alternative 1: No Project	Alternative 2: No Project with By-Right Development	Alternative 3: Mixed-Use Project with Reduced Residential Density
Recreation	Less than significant	-	-	=
Transportation and Traffic	Less than significant	+	-	+
~~Tribal Cultural Resources~~	~~Less than significant with mitigation incorporated~~	~~=~~	~~-~~	~~=~~
Utilities & Service Systems	Less than significant with mitigation incorporated	+	+	=
Wildfire	Less than significant	=/-	=/+	=

Other CEQA

Page 6-2 (Section 6.1.3 Removal of Obstacles to Growth)

The proposed project is located in a fully urbanized area that is well served by existing infrastructure. As discussed in Section 4.15~~6~~, *Utilities and Service Systems*, of this EIR and Section 4.14, *Transportation and Traffic* of this EIR, existing infrastructure in Thousand Oaks would be adequate to serve the proposed project.

Page 6-2 (Section 6.2 Irreversible Environmental Effects)

The project would implement mitigation measures, as discussed in Section 4.4 *Cultural* and Tribal *Resources*, which reduce impacts to a less than significant level.

References

Page 7-2 (Section 7.1 Bibliography)

_____. 2022. Learn About Asbestos. April 14, 2022. https://www.epa.gov/asbestos/learn-about-asbestos#asbestos (accessed May 2022).

This page intentionally left blank.

RESOLUTION NO. PC XX-2022

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF THOUSAND OAKS, RECOMMENDING THAT THE CITY COUNCIL CERTIFY THE FINAL ENVIRONMENTAL IMPACT REPORT ("EIR"), ADOPT A MITIGATION MONITORING AND REPORTING PROGRAM, A FINDINGS OF FACT, AND ADOPT A STATEMENT OF OVERRIDING CONSIDERATIONS FOR THE T.O. RANCH MIXED-USE MULTI-FAMILY RESIDENTIAL REDEVELOPMENT PROJECT.

The City Council of the City of Thousand Oaks hereby resolves as follows:

SECTION 1. In April 2022, the City initiated an update process that has resulted in preparation its first Environmental Impact Report (EIR) since 2014.

SECTION 2. Notice of the public hearing before the Planning Commission on May 23, 2022, was advertised in the Ventura County Starr on April 17, 2022.

SECTION 3. Pursuant to the California Environmental Quality Act (Cal. Pub. Res. Code, Section 21000 et. seq., as amended) ("CEQA") and implementing guidelines (Cal. Code Regs., Title 14, Section 15000 et. seq.) ("Guidelines"), the City, acting as Lead Agency, circulated a Notice of Preparation ("NOP") for the project on December 21, 2021, beginning a 40-day review period. During the NOP public review period, a scoping meeting was held on January 12, 2022, to obtain comments on the environmental analysis. The NOP and letters received in response to the NOP from public agencies, organizations, and members of the public are included in Appendix A of the Draft EIR. The Draft EIR was circulated for a 45-day review period. The local review period was initiated on April 08, 2022 and ended May 23, 2022 and the state agency review period was initiated on April 11, 2022 and ended on May 25, 2022. The Final EIR was made public on June 14, 2022. All required notifications were provided pursuant to CEQA (Public Resources Code Section 21092.5), and all comment letters were incorporated into the Final EIR.

SECTION 4. In accordance with Public Resources Code Section 21092.5, the City provided written proposed responses to public agencies that commented on the Draft EIR ten (10) days prior to certification of the Final EIR.

SECTION 5. The City prepared the T.O. Ranch Mixed-Use and Multi-Family Residential Redevelopment project EIR (State Clearinghouse #2021120559) in its capacity as lead agency under CEQA and in compliance with CEQA. The Final EIR consists of the NOP, Notice of Completion, Notice of Availability, Draft EIR, Technical Studies, the Responses to Comments, Final Corrections and Additions, Mitigation Monitoring and Reporting Program, and the Findings of Fact for Adoption of a Final EIR for the project, including a Statement of Overriding Considerations. Hereafter, these documents will be referred to collectively as the "Final EIR."

SECTION 6. In accordance with CEQA Section 21082.1, the City Council independently reviewed and analyzed the Final EIR and the administrative record relating to the proposed project, including all oral and written comments received during the public review process. The Final EIR constitutes an accurate and complete statement of the environmental impacts of the proposed project. The Final EIR reflects the independent judgment of the City Council, and hereby adopts the facts and analysis in the Final EIR and certify the Final EIR. The omission of some detail or aspect of the Final EIR does not mean that it has been rejected by the City Council. Although some revisions have been made to the Draft EIR in response to public comment, the City Council further finds that the EIR need not be recirculated pursuant to CEQA Guidelines Section 15088.5 because the City finds that it has not received any evidence of significant new information. No evidence indicates the existence of 1) new significant environmental impacts would result from the project or from a new mitigation measure proposed to be implemented; 2) substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance; 3) a feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it; or 4) a deficiency that caused the EIR to be fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. (Mountain Lion Coalition v. Fish & Game Com.(1989) 214 Cal.App.3d 1043).

SECTION 7. A Draft EIR has been prepared pursuant to CEQA and the Guidelines. No impacts to agricultural and forestry resources, hydrology and water quality, or to mineral resources would occur as a result of the proposed project. Impacts related to aesthetics, air quality, biological resources, cultural and tribal cultural resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, land use and planning, construction vibration, operational noise and vibration, population and housing, public services, recreation, transportation, utilities and service systems, and wildfire would be considered less than significant or less than significant with mitigation measures. Impacts related to construction noise would be significant and unavoidable.

SECTION 8. Pursuant to Section 15091 (a)(1) of the CEQA Guidelines, the City Council finds that changes or alterations have been required in the project that, to the extent feasible, substantially lessen the significant environmental effects identified in the EIR. These changes or alterations are included in the Mitigation Monitoring and Reporting Program (Exhibit A). In accordance with Section 15091 (d), and Section 15097 of the CEQA Guidelines, which require a public agency to adopt a program for reporting or monitoring required changes or conditions of approval to substantially lessen significant environmental effects, the Planning Commission hereby recommends that the City Council adopt the Mitigation Monitoring and Reporting Program incorporated herein as Exhibit A. To the extent there is any conflict between the Mitigation Monitoring and Reporting Program, the EIR, or the Findings of Fact, the terms and provisions of the Mitigation Monitoring and Reporting Program shall control.

SECTION 9. The City Council makes the findings described in the Findings of Fact for Adoption of a Final EIR and adopts the Statement of Overriding Considerations.

SECTION 10. The location and custodian of the documents and other material, which constitute the record of proceedings upon which the Planning Commission based its recommendation, is as follows: Planning and Development Services 2100 Thousand Oaks Boulevard, Thousand Oaks, CA 91362.

PASSED, APPROVED AND ADOPTED this 14th day of June 2022, by the following vote, to wit:

_____
Click to enter NAME
Click to enter TITLE
Click to enter CITY

ATTEST:

_____
Click to enter NAME
Click to enter TITLE
Click to enter CITY

CEQA FINDINGS OF FACT

AND STATEMENT OF OVERRIDING CONSIDERATIONS

The California Environmental Quality Act (Pub. Resources Code, § 21000 et seq.) (CEQA) requires that public agencies shall not approve or carry out a project for which an environmental impact report (EIR) has been certified that identifies one or more significant adverse environmental effects of a project unless the public agency makes one or more written Findings for each of those significant effects, accompanied by a brief explanation of the rationale for each Finding (CEQA Guidelines [Cal. Code Regs., tit. 14, § 15000 et seq.], § 15091). This document presents the CEQA Findings of Fact made by the City of Thousand Oaks, in its capacity as the CEQA Lead Agency, regarding the Thousand Oaks Ranch Mixed-Use and Multi-Family Residential Redevelopment (project), evaluated in the Draft Environmental Impact Report (Draft EIR) and Final Environmental Impact Report (Final EIR) for the Project.

SECTION I.
INTRODUCTION

Public Resources Code section 21002 states that "public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects[.]" Section 21002 further states that the procedures required by CEQA "are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects."

Pursuant to section 21081(a) of the Public Resources Code, a public agency may only approve or carry out a project for which an EIR has been completed that identifies any significant environmental effects if the agency makes one or more of the following written finding(s) for each of those significant effects accompanied by a brief explanation of the rationale for each finding:

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

As indicated above, section 21002 requires an agency to "avoid or substantially lessen" significant adverse environmental impacts. Thus, mitigation measures that "substantially lessen" significant environmental impacts, even if not completely avoided, satisfy section 21002's mandate. (*Laurel Hills Homeowners Assn. v. City Council* (1978) 83 Cal.App.3d 515, 521 ["CEQA does not mandate the choice of the environmentally best feasible project if through the imposition of feasible mitigation measures alone the appropriate public agency has reduced environmental

damage from a project to an acceptable level"]; *Las Virgenes Homeowners Fed., Inc. v. County of Los Angeles* (1986) 177 Cal. App. 3d 300, 309 ["[t]here is no requirement that adverse impacts of a project be avoided completely or reduced to a level of insignificance . . . if such would render the project unfeasible"].)

While CEQA requires that lead agencies adopt feasible mitigation measures or alternatives to substantially lessen or avoid significant environmental impacts, an agency need not adopt infeasible mitigation measures or alternatives (Pub. Resources Code, § 21002.1(c) [if "economic, social, or other conditions make it infeasible to mitigate one or more significant effects on the environment of a project, the project may nonetheless be carried out or approved at the discretion of a public agency"]; see also State CEQA Guidelines, § 15126.6(a) [an "EIR is not required to consider alternatives which are infeasible"].) CEQA defines "feasible" to mean "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors." (Pub. Resources Code, § 21061.1.) The CEQA Guidelines add "legal" considerations as another indicia of feasibility. (State CEQA Guidelines, § 15364.) Project objectives also inform the determination of "feasibility." (*Jones v. U.C. Regents* (2010) 183 Cal. App. 4th 818, 828-829.) "'[F]easibility' under CEQA encompasses 'desirability' to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, and technological factors." (*City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 401, 417; see also *Sequoyah Hills Homeowners Assn. v. City of Oakland* (1993) 23 Cal.App.4th 704, 715.) "Broader considerations of policy thus come into play when the decision-making body is considering actual feasibility[.]" (*Cal. Native Plant Soc'y v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 1000 ("*Native Plant*"); see also Pub. Resources Code, § 21081(a)(3) ["economic, legal, social, technological, or other considerations" may justify rejecting mitigation and alternatives as infeasible] (emphasis added).)

Environmental impacts that are less than significant do not require the imposition of mitigation measures. (*Leonoff v. Monterey County Board of Supervisors* (1990) 222 Cal.App.3d 1337, 1347.)

The California Supreme Court has stated, "[t]he wisdom of approving . . . any development project, a delicate task which requires a balancing of interests, is necessarily left to the sound discretion of the local officials and their constituents who are responsible for such decisions. The law as we interpret and apply it simply requires that those decisions be informed, and therefore balanced." (*Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 576.) In addition, perfection in a project or a project's environmental alternatives is not required; rather, the requirement is that sufficient information be produced "to permit a reasonable choice of alternatives so far as environmental aspects are concerned." Outside agencies (including courts) are not to "impose unreasonable extremes or to interject [themselves] within the area of discretion as to the choice of the action to be taken." (*Residents Ad Hoc Stadium Com. v. Board of Trustees* (1979) 89 Cal.App.3d 274, 287.)

SECTION II.
FINDINGS REGARDING ENVIRONMENTAL IMPACTS NOT REQUIRING MITIGATION

The City Council hereby finds that the following potential environmental impacts of the proposed project are less than significant and therefore do not require the imposition of Mitigation Measures.

A. AESTHETICS

1. Scenic Vistas

Threshold: Would the project have a substantial adverse effect on a scenic vista?

Finding: Less than significant. (Draft EIR)

Explanation: There are no State Scenic Highways near the proposed project site. The portion of US-101 located just north of the proposed project site is not listed as either designated, or eligible to become designated, as a State Scenic Highway According to the Ventura County General Plan, however, US-101 provides scenic views of the Conejo Valley, including where it traverses Thousand Oaks. The proposed project would include buildings up to four stories high, next to Hampshire Road, which might be visible from limited section of US-101 for northbound travelers. Because the site is located approximately 500 feet south of the freeway and existing mature trees and other existing development intervene with longer distance views from this direction, and because drivers would be travelling at high speeds (up to 70 miles per hour), the viewer sensitivity would be moderate. The hillsides would still be visible with proposed project implementation. Scenic vistas would not be impacted substantially as viewed from US-101. Hampshire Road is not designated as a scenic roadway, and project development would not substantially block vistas from Hampshire Road. The proposed project would be constructed in an area with existing development and is designed to integrate into the existing developed urban area. Further, the project is designed to be consistent with policies and guidelines to minimize impacts to scenic vistas. This includes architecture and landscaping that helps to integrate the project site with surrounding vegetated hillsides and developments.

2. Scenic Resources

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

Finding: No impact. (Draft EIR)

Explanation: There are no State Scenic Highways near the proposed project site. The nearest state scenic highway is United States Highway 101 (US-101) which approximately 52 miles north of the proposed project site, in Santa Barbara County. The portion of the highway located north of the proposed project site is not listed as either designated, or eligible to become designated as a State Scenic Highway Elsewhere in Ventura County, State Route (SR) 118 from SR 23 to Desoto Avenue is eligible for a State Scenic Highway; however, SR 118 is approximately 11 miles from the proposed project site. SR 33 is also eligible or designated as a State Scenic Highway throughout Ventura County but starting more than 15 miles northeast of Thousand Oaks. Neither of these State Routes are visible from the proposed project. Therefore, the project would not result in substantial damage to scenic resources in a state scenic highway. No impacts would occur.

3. Visual Character

Threshold: In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public view of the site and its surroundings?

Finding: Less than significant. (Draft EIR)

Explanation: The proposed project would occur in an urbanized area primarily characterized by office and commercial uses with large surface parking lots. The existing site consists of a defunct commercial center with a parking lot in poor condition and ruderal vegetation. The proposed project would require a zoning change to construct a more dense, mixed-use development than allowed by the C-1 zoning designation and would be required to comply with the design requirements of the new T.O. Ranch Specific Plan (SP) zoning designation. The proposed project would redevelop the site with a well-designed, vibrant complex of residential and commercial or work/live spaces, designed to create a sense of place and community. Combined with the public and private open spaces within the complex and the connectivity to the adjacent western open space, the redevelopment would result in beneficial visual impacts. The proposed multi-story structures that incorporate offset massing, varied wall planes, and varied height to visually reduce the massing of the multi-story buildings that incorporate warm exterior finishes and neutral colors. Landscaping is incorporated throughout the project in the form of outdoor gathering spaces and landscaped areas with landscaping compatible with the landscape character of the city. Through the architecture and landscaping, the project is integrated into the surroundings of the area. Therefore, the through the redevelopment of a defunct commercial center, new multi-story structures and enhanced landscaping throughout the site, the project would not substantially degrade the existing visual character or quality of public view of the site and its surroundings. Impacts would be less than significant.

4. Light and Glare

Threshold: Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Finding: Less than significant. (Draft EIR)

Explanation: The site is currently developed with an existing vacated department store, associated vacant retail shops, and a large surface parking lot. The project proposed would incorporate building windows and landscaped areas to shade reflective surfaces within the development and the project perimeter. Most parking would be subterranean, below the mixed-used buildings and the residential units. Some surface parking would occur near the retail shops, but these spots would be shaded by the proposed project's landscape. Exterior lighting associated with proposed project would comply with the Thousand Oaks Municipal Code (TOMC) Section 8-1.19, Section 9-4.1109 and 2405, and Section 9-4.2308 which regulate light spillage, exterior lighting placement and direction, style, and luminosity. Lighting requirements in the T.O. Ranch Specific Plan would ensure that parking lot and exterior lights be downward facing, shielded, and limited in brightness so that they do not spill onto or affect adjacent properties adversely and that light fixtures near residential uses to the south of the proposed project site would be limited to 14 feet in height. With adherence to all design criteria and lighting regulations, the proposed project impacts to light and glare would be less than significant.

B. AGRICULTURE AND FOREST RESOURCES

Thresholds: 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?

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

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))?

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

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?

Finding: No Impact. (Draft EIR)

Explanation: Based on the California Department of Conservation (DOC)'s Farmland Mapping and Monitoring Program (FMMP) and Williamson Act maps, the proposed project site is not a State-designated Farmland, is not enrolled in Williamson Act contracts, nor does it support forest land or resources (California DOC, 2017 and 2018). According to the DOC the site is designated as "Urban and Built-Up Land" and does not contain any agricultural, forest or timberland resources or uses. Furthermore. the proposed project site has previously been developed as a shopping center and parking lot and therefore the proposed project would not result in conversion of farmland or forest land to non-agricultural or non-forest use. Based on the above, the proposed project would have no impact with respect to conversion of Farmland to non-agricultural use; conflict with existing agricultural zoning or Williamson Act contract; result in the loss of forest land or conversion of forest land to non-forest use; or other conversion of farmland to non-agricultural use.

C. AIR QUALITY

1. Applicable Air Quality Plan

Threshold: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Finding: Less than significant. (Draft EIR)

Explanation: The 2016 Ventura County (County) Air Quality Management Plan (AQMP) estimates the County population to increase to 905,574. The proposed project would result in an estimated increase of 1,294 residents, and increase the County's population to 836,694, which is within the County's anticipated population growth forecast. Further, the Ventura County Air Pollution Control District (VCAPCD) Guidelines state "if there are more recent population forecasts that have been adopted by the Ventura Council of Governments (VCOG) where the total county population is lower than that included in the most recently adopted AQMP population forecasts, lead agencies may use the more recent VCOG forecasts for determining AQMP consistency" (VCAPCD 2003). According to the Southern California Association of Governments' (SCAG) Connect SoCal 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal), the projected population for the County for the years 2020 and 2030 are 877,000 and 906,000 persons, respectively. By interpolation, the County's 2025 population would be approximately 891,500 persons, based on the Connect SoCal estimates (SCAG 2020). The proposed project-related population growth would also be within the more recently adopted population forecasts. Therefore, the proposed project would not generate growth exceeding the most recently adopted AQMP population forecasts

and thus would not be inconsistent with the AQMP. Potential impacts associated with a potential inconsistency with the AQMP would be less than significant.

2. Cumulatively Considerable Pollutant Emissions

Threshold: 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?

Finding: Less than significant. (Draft EIR)

Explanation: The construction of the proposed project would result in short-term construction-generated emissions that are temporary but may a represent a significant air quality impact. Construction activities such as demolition, grading, construction working travel, and fuel combustion by on-site construction equipment would generate emissions of ozone precursors and fugitive dust. As shown in the CalEEMod calculation in the Table 4.2-5 of the EIR, the short-term related emissions would not exceed VCAPCD guidelines 25 lbs/day and therefore would not trigger mitigation measures. While the proposed project would result in long-term air pollutant emissions over the course of operations from emissions from area sources (consumer products, gas-powered landscaping equipment, and re-painting), energy sources (natural gas appliances), and mobile sources consisting of vehicle trips, the emissions generated by the operation of the proposed project would not exceed VACAPCD regional thresholds for criteria pollutants as shown in the Table 4.2-6 in the EIR. Therefore, the proposed project would not contribute substantially to an existing or projected air quality violation. In addition, because criteria pollutant emissions and regional thresholds are cumulative, the proposed project would not result in a cumulatively considerable net increase of criteria pollutants. Impacts would be less than significant.

3. Sensitive Receptors

Threshold: Would the project expose sensitive receptors to substantial pollutant concentrations?

Finding: Less than significant. (Draft EIR)

Explanation: Certain population groups, such as children, the elderly, and people with health problems, are particularly sensitive to air pollution. Therefore, sensitive receptor locations include schools, hospitals, and residences. The closest sensitive use to the proposed project site is an assisted living facility located approximately 20 feet north of the site.

Construction: A Health Risk Assessment (HRA) was prepared for the

proposed project. In addition, Appendix B of the Draft EIR presents the carcinogenic risk estimates for the maximum exposed residential, patient rehabilitation facility, and early childhood center receptors. The total carcinogenic risk for a maximum exposed residential, patient rehabilitation facility, and early childhood center receptor is 0.32 in one hundred thousand (100,000), 0.014 in 100,000, and 0.58 in 100.000 individuals exposed, respectively. Therefore, the proposed project's cancer risks for the identified sensitive receptor are predicted to be below the significance threshold of one in 100,000. An evaluation of the potential noncancer effects of Diesel Particulate Matter exposure was also conducted. As presented in Appendix B of the Draft EIR, the hazard index for the respiratory endpoint totaled less than one for all sensitive receptor occupancies (i.e., residential, patient rehabilitation facility and early childhood center receptors). The total noncarcinogenic risk for a maximum exposed residential, patient rehabilitation facility, and early childhood center receptor is 0.0030, 0.0036, and 0.022 individuals exposed, respectively. Therefore, the proposed project's noncarcinogenic risks for the identified sensitive receptor are predicted to be below the significance threshold of one.

Based upon the predicted carcinogenic risk and noncarcinogenic hazard estimates for the receptor exposure scenarios, the HRA demonstrates that construction of the proposed project would not result in unacceptable localized impacts. Impacts would be less than significant.

Operation: Industrial manufacturing processes, warehousing, ports, rail yards, refineries, chrome platers, gasoline dispensing facilities, automotive repair facilities, and dry-cleaning facilities are the typical land uses that result in exposure of sensitive receptors to Toxic Air Contaminants (TACs). The proposed project is a mixed-use residential and commercial development that would not include any of these potential sources, although minimal emissions may result from the use of consumer products. The proposed project would generate minor amounts of diesel fuel emissions from infrequent delivery trucks and incidental maintenance activities. Proposed project operations would only result in minimal emissions of air toxics from maintenance or other ongoing activities, such as from the use of architectural coatings and other products. It is not anticipated that an emergency back-up generator would be part of the proposed project development. If a generator was installed, it would be used only during emergencies and for maintenance and inspection purposes. Emergency back-up generators are subject to VCAPCD regulatory requirements, which limit the allowable emissions to a level below that which would result in a significant impact. The periodic operation of a backup generator would not, therefore, expose nearby sensitive receptors to substantial TAC emissions. Given the land use type and activities anticipated, proposed project operations are not considered a substantial source of TACs or health risk.

Therefore, impacts with respect to operational TACs would be less than significant

The California Air Resources Board further suggests that an operational health risk assessment be conducted for new developments resulting in sensitive receptors being placed within 500 feet of an existing high-volume roadway. The proposed project would not place new sensitive receptors within 500 feet of a high-volume roadway. In addition, the Title 24 standards would require new residential units to include MERV 13 standard air filtration (at a minimum) that would reduce PM_{10} emissions by at least 70 percent. Therefore, new residents are not anticipated to be adversely affected by exposure to vehicle exhaust long term.
In comments on the Draft EIR, the VCAPCD recommended a health risk assessment for proximity to the freeway be included in the analysis. As detailed under Response to Comment A-7-5, the impacts of the environment on the project, specifically impact from proximity to freeways, is not one of the criteria identified in CEQA Guidelines Appendix G for determining whether a development would result in significant air quality impacts. Additionally, the purpose of environmental evaluation under CEQA is to identify the significant effects of the project on the environment, not the significant effects of the environment on the project as confirmed by *California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369 (Case No. S213478). Therefore, the HRA for freeway proximity is provided for informational and disclosure purposes only, and is not considered part of the impact analysis for the purpose of

CEQA compliance. The HRA for freeway proximity does not constitute significant new information pursuant to CEQA Guidelines Section 15088.5.

As presented in Response to Comment A-7-5, with the incorporation of MERV filtration ranging from 2013 to 2016 as required under 2019 Title 24 and implemented for the project under the project Conditions of Approval, risk to residents living within the proposed project would be equal to or below the 1 in 100,000 VCAPCD threshold for cancer risk and below the non-cancer threshold of 1

San Joaquin Valley Fever: According to the VCAPCD Guidelines, the lead agency should consider the factors applicable to the proposed project or the project site to determine if it could create a significant Valley Fever impact. The proposed project is an infill project that is developed with buildings, surface parking lot and remnant landscaped areas. As such, development of the proposed project would not disturb topsoil of undeveloped land or occur within undisturbed, non-urban areas. The proposed project does not include any known archaeological resources, nor is proposed to host special events or motorized activities on unvegetated soil. During construction, the project would be required by VCAPCD Rule 55 to implement measures to

minimize fugitive dust during construction, including application of chemical dust control agents, or water to exposed soils, further reducing potential Valley Fever impacts. As such, the factors that according to VCAPCD may indicate potential Valley Fever impacts do not apply to the proposed project site or proposed activities. Therefore, the potential for the proposed project to result in substantial San Joaquin Valley Fever impacts would be less than significant.

4. Objectionable Odors

Threshold: Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Finding: Less than significant. (Draft EIR)

Explanation: The proposed project would not create objectionable odors that would adversely affect a substantial number of people. During construction, the application of certain materials (i.e., asphalt, paints, etc.) may generate odors within various portions of the site that would be temporary in nature and are common to construction projects. Land uses typically associated with objectionable odors that could potentially adversely affect a substantial number of people include manufacturing, industrial, agricultural, or sewage treatment processes, and typically are not associated with residential and commercial land uses. Operations would include enclosures for trash and recycling that would be emptied on a regular basis reducing potential odors. As such, odor impacts of the proposed project during construction and operation would be less than significant

D. BIOLOGICAL RESOURCES

1. Riparian Habitat

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

Finding: No impact. (Draft EIR)

Explanation: Because the site is highly developed, containing primarily ornamental vegetation, with no reparation habitat or identified sensitive natural communities, the project would have no impact to riparian habitats and sensitive natural communities.

2. Wetlands

Threshold: Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but

not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Finding: No impact. (Draft EIR)

Explanation: No evidence of state or federally protected waters or wetlands exist or were mapped on or immediately adjacent to the proposed project site according to the National Wetlands Inventory (NWI) (USFWS 2022b) nor were any observed during the field survey. Therefore, the proposed project would have no impact to state or federally protected waters or wetlands.

3. Wildlife Movement

Threshold: 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?

Finding: No impact. (Draft EIR)

Explanation: No impacts to wildlife movement corridors are expected to occur. The highly developed proposed project site constitutes a small area lacking suitable habitats, dense foliage cover, and vegetation communities to serve a wildlife nursery site or substantially contribute to wildlife movement or corridors. Therefore, the proposed project would have no impact to wildlife movement or nursery sites.

4. Habitat Conservation Plans

Threshold: 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?

Finding: No impact. (Draft EIR,)

Explanation: The proposed project is not located within any approved local, regional, or state Habitat Conservation Plan or Natural Community Conservation Plan. Therefore, no impacts would occur.

E. CULTURAL AND TRIBAL RESOURCES

1. Historical Resources

Threshold: Would the project cause substantial adverse change in the significance of a historical resource as defined by Section 15064.5?

Finding: No impact. (Draft EIR)

Explanation: The proposed project proposes the demolition of a utilitarian commercial building that was commonly used for its function in the 1960s and 1970s. The type of architecture is rarely considered the work of a master architect, and a records search did not yield the name of the architect or firm associated with the building, further suggesting the building design was not performed by a master architect. The building was also analyzed criteria used by the California Register of Historic Resource and found ineligible for listing in the CRHR under Criterion 1, 2, 3, and 4 based on the building not being associated with an important contribution to history, not being associated with an important person, not representing the work of an important individual or possessing artistic value, and not containing important information to history. Therefore, the building is not considered a historical resource under CEQA and the proposed project would have no impacts to historical resources.

2. Tribal Cultural Resources

Threshold: Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, 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: (i) 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 (ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in Public Resources Code section 5024.1

Finding: Less than significant. (Draft EIR)

Explanation: Ground-disturbing activities associated with individual development projects under the Housing Element Update could expose previously unidentified subsurface archaeological resources that may qualify as Tribal Cultural Resources and could be adversely affected by the project construction. Given the highly developed nature of most Housing Element Update and rezone properties, the likelihood of encountering intact cultural or Tribal Cultural Resources is low to moderate. As part of its Tribal Cultural Resource identification process under AB 52 and SB18, the City of Thousand Oaks sent letters via certified mail to seven Native American Tribes that had previously requested to be informed through formal notification of proposed projects in the geographic area that is traditionally and culturally affiliated with the Tribes. AB 52 and SB 18 consultation between the City and California Native American tribes is included in Appendix D of the Draft EIR. The proposed project is part of a high-level planning document. No Tribal Cultural Resources were identified during consultation and no resources eligible for the California Register of

Historical Resources or local register were identified as being impacted by the proposed project. Any future project implementation would require project-specific Tribal Cultural Resource identification and consultation, and the appropriate avoidance, minimization, or mitigation would be incorporated. AB 52 consultation, thus far, did not identify Tribal Cultural Resources in the project area as part of this analysis. The proposed project would have a less than significant impact to Tribal Cultural Resources.

F. ENERGY

1. Wasteful Use of Energy

Threshold: Would the project result in potentially significant impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Finding: Less than significant. (Draft EIR)

Explanation: *Construction:* During construction, the proposed project would consume fuels associated with the onsite use of equipment, off-site hauling of materials and supplies, and worker transportation. Transportation fuels, gasoline and diesel, would be used to operate heavy equipment, light-duty vehicles, and machinery. The California Code of Regulations requires drivers of diesel-fueled commercial motor vehicles with gross vehicle weight ratings greater than 10,000 pounds not to idle the vehicle's primary diesel engine longer than five minutes at any location. Compliance with this regulation would prevent unnecessary consumption of energy from use of diesel fuel during construction. Electricity use for lighting and electronic equipment during construction would vary throughout the construction period. Night lighting would be limited to safety and security purposes, as the City's ordinance places restriction on nighttime construction activity. These activities would cease upon completion of the proposed project. Project construction would not typically rely on natural gas as an energy source. Therefore, substantial quantities of natural gas would not be consumed in support of proposed project construction.

Operation: The long-term operation of the proposed project would necessitate the consumption of energy for vehicle trips, water conveyance, solid waste disposal systems, lighting, and to operate electronic equipment and devices and HVAC systems. Electricity service in the City is provided by Southern California Edison (SCE). Southern California Gas Company (SoCal Gas) provides natural gas services to residents and businesses in the City.

The proposed project would generate additional demand from SCE. SCE currently supplies more than 87 million MWh/year, and the project is anticipated to have an electricity demand of 3,185.8 or approximately 0.004

percent of the yearly electricity demand, a negligible increase in electricity demand. In addition, the proposed project would be required to comply with the applicable portions of the California Energy Code and California Green Building Standards Code (CALGreen Code), which establish planning and design standards for sustainable development, energy efficiency, water conservation, and material conservation. By required compliance with applicable regulations and continued energy efficient programs implemented by SCE, the proposed project's potential impacts regarding wasteful or inefficient use of electricity would be less than significant. The proposed project would generate additional demand for natural gas from SoCalGas. Natural gas demand for the project would be approximately 5,092,920 kBTU/year while the County consumed 18,013,671,930 kBTU/year of natural gas in 2020. The project would represent a 0.03 percent increase demand in natural gas, a negligible amount relative to countywide consumption. The proposed project would be required to comply with the applicable portions of the California Energy Code and California Green Building Standards Code (CALGreen Code), which establish planning and design standards for sustainable development, energy efficiency, water conservation, and material conservation. By required compliance with applicable regulations, the proposed project's potential impacts regarding wasteful or inefficient use of electricity and gas would be less than significant.

2. Renewable Energy and Efficiency Plans

Threshold: Would the project conflict with or obstruct a state of local plan for renewable energy or energy efficiency?

Finding: Less than significant. (Draft EIR)

Explanation: The City would review proposed project site plans to verify compliance with the City's Conservation Element, and the Building and Energy Efficiency Standards in the California Energy Code prior to issuing a building permit. As a regulatory requirement, the proposed project would be reviewed for consistency with applicable State and local plans for renewable energy and efficiency, including CALGreen Code Title 24 standards. In addition, the project proposes a mixed-use development with residential and commercial uses on an infill site. The project would provide bicycle storage areas with electric bike (e-bike) charging stations to encourage active transportation and reduce VMT and would install solar panels to supplement electricity supplied by SCE. To reduce use of transportation fuels, 10 percent of the parking spaces would have electric vehicle (EV) chargers installed, and 30 percent of the parking would be EV-ready to facilitate future installation of additional EV charging equipment. As the proposed project would comply with regulatory requirements for building efficiency and incorporate features that encourage a reduction in the use of gasoline-fueled vehicles, the proposed project would not conflict

with a State or local plan for renewable energy or energy efficiency and impacts would be less than significant.

G. GEOLOGY AND SOILS

1. Fault Rupture

Threshold: 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; strong seismic ground shaking; seismic-related ground failure including liquefaction; or landslides?

Finding: Less than significant. (Draft EIR)

Explanation: The proposed project site has not been identified as having a known earthquake fault as delineated in the most recent Aquist-Priolo Earthquake Fault Zoning Map. No active faults have been mapped within the City of Thousand Oaks.

As with any site in the southern California region, the proposed project site is susceptible to strong seismic ground shaking in the event of a major earthquake. According to the Gorian Geotechnical Report, the potential for ground rupture due to faulting during the lifetime of the proposed project is considered remote.

The impact to people, buildings, or structures on the proposed project site from strong seismic ground shaking would be reduced by the required conformance with applicable building codes, accepted engineering practices, and the Thousand Oaks General Plan Policies. Geology and seismicity policies in the Safety Element (Policies A-1 through A-7, B-1 through B-5, and B-15 through B-18) require all structures within the City to be built to the latest seismic safety requirements of the California Building Code, Uniform Building Code, and the Thousand Oaks Municipal Code.

Therefore, through compliance with the applicable building codes, accepted engineering practices, and the Thousand Oaks General Plan polices, the proposed project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault. Potential impacts associated with rupture of the ground surface within the vicinity of the proposed project site would be less than significant.

2. Unstable Soils

Threshold: 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?

Finding: Less than significant. (Draft EIR)

Explanation: The project site is not located within a liquefaction zone per the California Seismic Hazard Map. Additionally, the property is shown to be outside of an area having a potential for liquefaction in the State Earthquake Zones of Required Investigation, Thousand Oaks Quadrangle, Seismic Hazard Zones Quadrangle Official Map (CGS 2000). Therefore, impacts from seismic-related ground failure, including liquefaction and lateral spreading, would be less than significant.

3. Landslides

Threshold: Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

Finding: Less than significant. (Draft EIR)

Explanation: The proposed project site is generally flat, and according to the California Seismic Hazard Map as well as Figure 5 of the Thousand Oaks General Plan Safety Element, the proposed project site is not located within an earthquake-induced landslide hazard zone. Therefore, potential impacts associated with landslides would be less than significant.

4. Soil Erosion

Threshold: Would the project result in substantial soil erosion or the loss of topsoil?

Finding: Less than significant. (Draft EIR)

Explanation: Construction of the proposed project would require grading and excavation on a currently developed site. The grading and excavation activities would temporarily expose bare soils, which could be removed from the site and transported through wind shearing or stormwater runoff. Construction would disturb more than one acre of land, which mandates implementation of a National Pollutant Discharge Elimination System compliant Storm Water Pollution Prevention Plan (SWPPP). The SWPP would include best management practices to reduce soil erosion and sedimentation. Because the proposed project would be grading greater than 50 cubic yards, and a grading permit would be required and the project conditioned to include, but not limited to, dust and rodent control, conducting pre-construction meetings with neighbors, traffic control plan, amongst other measures, would ensure that the proposed grading will have minimal impact. With

mandatory implementation of the SWPPP and erosion control measures, impacts of the proposed project would be less than significant.

5. Septic Tanks

Threshold: Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

Finding: No impact. (Draft EIR)

Explanation: The proposed project is an urban infill site which would be served by existing infrastructure. The development proposed project is not anticipated to include the use of septic systems. Therefore, there would be no impact related to the use of septic tanks or alternative wastewater disposal systems.

H. GREENHOUSE GAS EMISSIONS

1. Emissions Generation

Threshold: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Finding: Less than significant. (Draft EIR)

Explanation: Construction of the proposed project would generate temporary greenhouse gas (GHG) emissions primarily from the operation of construction equipment onsite as well as from vehicles transporting construction workers to and from the proposed project site and heavy trucks to transport building materials and soil export. As estimated using CalEEMod 2020.4.0, the proposed project's construction activities would generate a total of approximately 2,489 MT CO2e emissions. As construction emissions occur for a limited period of a proposed project's lifetime, as a standard practice, GHG emissions from construction are amortized over a presumed project lifetime. A proposed project lifetime of 30 years is recommended by SCAQMD for amortizing construction-related GHG emissions. The proposed project's amortized construction-related emissions would therefore be 83 MT CO2e. The amortized construction emissions have been added to the project's annual operational GHG emissions as shown in the following discussion.

Operation of the proposed project would generate GHG emissions associated with area sources (e.g., landscape maintenance), energy and water usage, vehicle trips, and wastewater and solid waste generation. Annual operational emissions with amortized construction emissions would total approximately 3,564 MT of CO2e per year based on CalEEmod output files. However, no numeric threshold for determining the potential significance of GHG emissions has been adopted by the City, VCAPCD,

SCAQMD, nor any other State, regional, or local agency with jurisdiction of the proposed project site. Accordingly, the proposed project's estimated emissions are provided pursuant to CEQA Guidelines Section 15064.4(a) for informational and disclosure purposes only. The estimate is a conservative evaluation that does not quantify measures that would reduce energy and water use, encourage use of EVs or electric bicycles (e-bikes), or other transportation demand management measures which may be required by the City as conditions of approval through the land use entitlement process. Additionally, as future tenants or employees of the proposed project currently generate GHG emissions where they currently reside and/or are employed which cannot be known, the proposed project's estimated emissions estimates conservatively does not reflect the net change in global, State, or regional GHG emissions that would result from the implementation of the proposed project. Impacts would be less than significant.

2. Emission Reduction Plans

Threshold: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emission of greenhouse gases?

Finding: Less than significant. (Draft EIR)

Explanation: Plans and polices have been adopted to reduce GHG emissions in the southern California region, including SCAG's 2020-2045 SCAG RTP/SCS (Connect SoCal), the Climate Change Scoping Plan, and the State's 2017 Scoping Plan. As discussed, the proposed project would not conflict with plans and policies aimed at reducing GHG emissions.

2020-2045 SCAG RTP/SCS (Connect SoCal)The SCAG 2020–2045 RTP/SCS, adopted September 3, 2020, is a long-range visioning plan that builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. The RTP/SCS plans to accommodate future growth through intensification of residential and commercial land uses in urban areas to reduce VMT, which would reduce emissions of GHGs in the transportation sector, the largest contributing sector to statewide GHG emissions. Table 4.7-2 of the Draft EIR, demonstrates that the project is consistent with the relevant strategies identified in the SCAG 2020-2045 RTP/SCS that could be implemented to help achieve the State-mandated GHG emissions reduction targets and provides an analysis of project consistency with each strategy.

Climate Change Scoping Plan: In 2008, the CARB adopted the Climate Change Scoping Plan: A Framework for Change (Scoping Plan), which establishes an overall framework for measures to reduce statewide GHG emissions for various sources/sectors to 1990 levels by 2020, consistent

with the reduction targets of Assembly Bill 32 (AB 32). Table 4.7 3 in the Draft EIR, provides an analysis of proposed project consistency with these strategies.

2017 Scoping Plan: The 2008 Scoping Plan was updated in 2014, and again in 2017. The 2017 update to the Scoping Plan proposes CARB's strategy for achieving the State's 2030 GHG reduction target as established in SB 32. Table 4.7 4 in the Draft EIR, provides an analysis of the proposed project's consistency with the latest Scoping Plan Update (2017) policies and primary objectives.

In summary, the proposed project would not conflict with any plans or policies adopted to reduce greenhouse gas emissions and impacts would be less than significant.

I. HAZARDS AND HAZARDOUS MATERIALS

1. Hazardous Materials

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

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?

Finding: Less than significant. (Draft EIR)

Explanation: Consistent with the City of Thousand Oaks' Housing Element Update policy to prioritize the development of new housing on urban infill sites, the proposed project includes the demolition of the existing building, which has known hazardous materials including asbestos and lead. Construction and operation of the proposed project could involve the use, storage, disposal or transportation of hazardous materials.

As detailed in the Draft EIR, the pre-demolition survey conducted by Stantec (2021) determined that numerous hazardous materials were present throughout the buildings on the project site, including Asbestos Containing Materials (ACM) and Lead Based Paint (LBP), as well as potential sources of Polychlorinated Biphenyls (or PCBs), mercury, radiation, and numerous other potentially hazardous materials normally associated with commercial buildings of this size and former use.

The City of Thousand Oaks Municipal Code, Section 8-1.05.3.5 (amended by Section 8-1.06) addresses the issuance of demolition permits within the City. In order to obtain a demolition permit, there must be a site inspection, a construction debris and recycling plan (which includes requirements for

diversion of certain amounts of construction and demolition wastes from landfill), and approval from the Building, Planning, and Public Works Departments. In addition, the applicant must obtain a signature from VCAPCD on the permit application. Approval from the various City Departments would be dependent upon acceptance of the debris and recycling plan, which must address the disposal of hazardous wastes generated during demolition. In order to obtain a signature from VCAPCD, the applicant would have to demonstrate compliance with VCAPCD Rule 6.27, which requires abatement of ACM by a licensed contractor prior to the issuance of a demolition permit. The requirements to obtain a demolition permit for the structures on the project location would ensure that ACM is handled appropriately and that hazardous materials are disposed of according to federal and State regulations. Therefore, all demolition activities associated with the proposed project that could involve hazardous materials in existing buildings, would fall under strict regulation and be required to be conducted in a manner which eliminates threats to worker or resident health and safety and would not create a significant hazard to the public or the environment. Impacts from demolition would be less than significant.

Construction of the proposed project may involve the temporary use, storage, and transport of hazardous materials related to construction activities, including fuel, solvents, paints, maintenance fluids, cleaners, and similar construction-related hazardous materials. If released, these substances could pose a threat to worker safety or a threat to the environment. The requirements for SWPPP development and for licensed transportation of any hazardous materials along designated routes would minimize any risks from use, storage, or transport of hazardous materials during construction, ensuring that the project did not present a significant risk to the public or the environment, and impacts would be less than significant.

Operation of the proposed project would include development of residential uses and commercial retail, open space, and other amenities. Standard residential activities do not present a significant threat to the public or the environment through the transport or use of hazardous materials due to the small amounts of hazardous materials residential uses generate as compared to a Small Quantity Generators (SQG) or larger commercial generator, and therefore impacts from the residential land uses would be less than significant. Most commercial uses at the proposed project would not be expected to generate or transport hazardous materials in quantities large enough to present a significant threat to the public or the environment. Those that do would be required to register with the Department of Toxic Substances Control (DTSC) as SQGs and comply with all applicable regulation regarding storage and transport of hazardous materials under the Resources Conservation and Recovery Act and other federal, State, and

local regulations. Adherence with the various regulations overseeing hazardous material transport would ensure that operation of the proposed project does not present a significant risk to the public or the environment through routine transport of hazardous materials or through reasonably foreseeable accident or spill conditions, and impacts would be less than significant.

2. Hazards Near Schools

Threshold: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Finding: Less than significant. (Draft EIR)

Explanation: Children are particularly susceptible to long-term effects from exposure to hazardous materials. Locations where children spend extended periods of time, such as schools, are considered sensitive to hazardous air emissions and accidental release associated with the handling of extremely hazardous materials, substances, or wastes. As described in Section 4.7.1, Setting, a preschool is located adjacent to the project site immediately to the southwest. There are no other schools within 0.25 mile of the project site.

As described under Impact HAZ-1 in the Draft EIR, the proposed project may involve use, storage, and transport of hazardous materials during construction and operation, as well as generation of hazardous materials during demolition including ACM and LBP. As described above, numerous regulatory requirements aid in minimizing threats to the public and the environment from such hazards. Adherence to the requirements of CCR Title 8 and VCAPCD Rule 6.27, such as monitoring for hazardous dust during demolition and construction activities, along with conditions set by the CUPA and the demolition and grading permits from the City of Thousand Oaks, would ensure impacts to the school from demolition and construction would be less than significant.

Hazardous materials generated through project operations would not be classified as acutely hazardous, although it is possible that certain medical office uses may generate acutely hazardous materials; however, such material generation would require additional levels of regulatory oversight and restriction under RCRA, the Hazardous Materials Transportation Act, DTSC, CUPA, Fire Code, and Building Code regulations. In addition, transporters of hazardous materials or wastes related to the proposed project development would be required to take the shortest route to the on-ramps to US-101, as discussed throughout this section. Therefore, there would be no significant risk to the school from reasonably foreseeable accident or spill conditions. Impacts to the preschool related to routine transport and use of hazardous materials would be less than significant Construction of the

proposed project may involve the temporary use, storage, and transport of hazardous materials related to construction activities, including fuel, solvents, paints, maintenance fluids, cleaners, and similar construction-related hazardous materials. If released, these substances could pose a threat to worker safety or a threat to the environment. The requirements for SWPPP development and for licensed transportation of any hazardous materials along designated routes would minimize any risks from use, storage, or transport of hazardous materials during construction, ensuring that the proposed project did not present a significant risk to the public or the environment, and impacts would be less than significant.

California Public Resources Code 21151.4 establishes notification requirements when projects which may involve the use of hazardous materials or generate hazardous emissions are proposed within the 0.25-mile radius from an area school. The notification requirements include consultation with the relevant school district prior to submission of environmental documents and written notification not less than 30 days before proposed certification of environmental documents. The notification requirements are intended to give school districts time to make lead agencies and project applicants aware of potential issues regarding the location of area schools and to ensure the districts are made aware of comment periods and opportunities for input on the approval process. Impacts to existing and proposed schools would be less than significant

3. Public Airports

Threshold: 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 for people residing or working in the project area?

Finding: No impact (Draft EIR)

Explanation: The proposed project is not located within an airport land use plan or within two miles of a public or private airport. The closest airport is Camarillo Airport, approximately 14 miles west, as well as Oxnard Airport, approximately 18 miles west. The Airport Master Plan for Camarillo Airport does not include the project site in its planning area noise contours (Camarillo 2011). There are multiple small heliports in the region, including the Las Robles and Westlake Medical Centers helipads and the East Valley Sheriff's Station Heliport. The Westlake Medical Center helipad is approximately two miles to the southeast. Noise from helicopters taking off and landing at this medical center would be barely discernable at the project area and would not result in a safety hazard or excessive noise for people residing or working in the project area. There would be no impact.

4. Emergency Plans

Threshold: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Finding: Less than significant. (Draft EIR)

Explanation: The primary documents governing emergency response in Thousand Oaks are the Ventura County Multi-Hazard Mitigation Plan (Ventura County 2015), the Thousand Oaks Emergency Operations Plan (Thousand Oaks 2020), and the Disaster Preparedness chapter of the Thousand Oaks General Plan Safety Element. The Ventura County Sheriff's Office of Emergency Services is responsible for the County evacuation plans and maintains evacuation route plans for the city, which are depicted in the General Plan Disaster Preparedness chapter, as well as handling the operational control of the various levels of evacuation which may be advised or ordered.

Access to U.S. 101 is a key component of an orderly evacuation in the project vicinity, as well as of all emergency response scenarios. The on-ramps to US-101 north of the project site are considered critical access points. Construction of the proposed project would not involve temporary or long-term obstruction of these access points, nor would it involve shutdown of State Highway 23 or Hampshire Road (a secondary evacuation route to US-101 for southern city of Thousand Oaks in case of loss of State Highway 23). Standard practices in construction traffic management require notification of local emergency response agencies in the event of a planned shutdown or obstruction of traffic along any public thoroughfare; thus, in the unlikely event that project construction would involve temporary traffic management along Hampshire Road, potential impacts related to obstruction would be known to local agencies. In addition, such construction impacts are highly unlikely to render Hampshire Road impassable to emergency vehicles; they would merely necessitate traffic management and possible temporary alteration of lane widths or number.

Therefore, the proposed project would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan. Impacts would be less than significant.

J. Hydrology and Water Quality

1. Water Quality

Threshold: Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Finding: Less than significant. (Draft EIR)

Explanation: Prior to beginning major construction activities, including the necessary demolition of existing structures which must occur prior to grading and site preparation, the project would be required to obtain NPDES coverage under the General Permit for Storm Water Discharges Associated with Construction Activity (known as the Construction General Permit or CGP) from the SWRCB. If grading for the proposed project encounters the water table below the site, coverage under the Los Angeles Regional Water Quality Control Board (RWQCB) Groundwater from Construction and General Dewatering Permit (NPDES No. CAG994004, Order R4-2013-0095) would be required prior to any discharge to stormwater infrastructure or nearby receiving waters. To obtain coverage under the CGP, the proposed project will be required to prepare and submit a SWPPP which will include a list of BMPs designed to reduce or eliminate any discharges of sediment or pollutants associated with the construction of the project during the entirety of construction activities. The proposed project would be required to comply with the terms of the CGP throughout development activities. Runoff from the proposed project may be required to be treated on-site or will discharge to either existing stormwater and drainage infrastructure or into newly created infrastructure will be of upgraded quality from the existing site infrastructure. All runoff into existing or new city stormwater infrastructure would be required to comply with the components of the Regional Phase I MS4 Permit (NPDES No. CAS004001, Order R4-2021-0105, the 'Regional Permit'), which covers Thousand Oaks. The Regional Permit is written in order to enforce the water quality standards and waste discharge requirements of the Los Angeles Region Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties (Basin Plan). As coverage under the CGP and post-construction compliance with the terms of the Regional Permit and the Storm Water Quality Management Program would be required of the proposed project, the project will correspondingly be required to comply with the waste discharge requirements of the Basin Plan and impacts would be less than significant. Currently the stormwater infrastructure on the proposed project location is outdated. The proposed project includes several design aspects, including use of permeable park space and updated infrastructure, which would serve to reduce the impacts of runoff and pollution from the project area. In addition, there are no surface waters nearby the project site which are listed as 303(d) impaired in the Basin Plan. Thus, impacts to surface and groundwater quality would be less than significant.

2. Groundwater Management

Threshold: 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?

Finding: Less than significant. (Draft EIR)

Explanation: The proposed project is located at the edge of the Thousand Oaks Area groundwater basin (DWR Basin and Subbasin 4-019). Basin levels remained stable from 1979 through 1999 (DWR 2003) and the quality is considered poor. As discussed in Section 4.16 Utilities and Service Systems water service to the project location is provided by the City of Thousand Oaks Municipal Service Center Water Division. The City's 2020 Urban Water Management Plan (UWMP) states that groundwater is not a water supply within the city, and the two groundwater wells the City does operate both are located in the adjacent Conejo Valley Groundwater Basin (DWR Basin 4-10). One of these wells is not utilized due to poor groundwater quality. The City does not utilize the Thousand Oaks Area basin (City of Thousand Oaks 2020). The basin has been assigned a priority of Very Low under the Sustainable Groundwater Management Act and has thus not formed a Groundwater Sustainability Agency or adopted a Groundwater Sustainability Plan, and groundwater storage was estimated at almost 90 percent of capacity in 1999 (DWR 2003). Thus, impacts to groundwater supplies and sustainable groundwater management would be less than significant.

Currently the proposed project site is almost entirely covered in impervious surfaces and all runoff is directed to stormwater drainage and eventual discharge. The proposed project features several components which would serve to increase the overall infiltration and recharge of precipitation and runoff from the site, including dog parks and open pervious areas. In addition, post-construction Low Impact Development (LID) features to reduce impacts to recharge and runoff would be required under the Regional Permit, and any implementation of pervious features into the proposed project site from project design would only serve to increase the amount of infiltration and recharge occurring due to stormwater on the site. Therefore, impacts to groundwater recharge would be less than significant.

3. Drainage Pattern

Threshold: 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, substantially increase the rate or amount of surface runoff in a manner which would result in flooding, 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 impede or redirect flood flows on- or off-site?

Finding: Less than significant. (Draft EIR)

Explanation: The current development of the proposed project site consists almost entirely of impervious surfaces and large commercial structures. The proposed project would serve to alter the existing drainage by improving

and upgrading existing infrastructure, as well as reducing the amount of impervious surface through incorporation of open pervious spaces and required use of post-construction runoff control and LID features, which would also serve to control and reduce erosion and siltation and pollutant runoff from proposed project operation. In addition, all polluted runoff from the proposed project site would be required to comply with the Regional Permit which includes provisions for trash (a primary pollutant from residential development). Therefore, impacts from increased runoff related to flooding, erosion, and polluted runoff would be less than significant.

Part VII.F.2 of the Regional Permit sets out the basic hydromodification requirements for compliance with the Regional Permit. These requirements include restrictions on alteration of stormwater runoff volumes or redirection of flood flows in ways which would impact capacity of existing stormwater systems or impede flood flows and include requirements for LID development and project design which ensure existing infrastructure will not be overwhelmed by increased runoff from projects. The proposed project would be required to comply with all provision of Part VII.F.2 of the Regional Permit throughout its lifespan and to demonstrate the methods for compliance in design documents. Therefore, impacts to stormwater infrastructure and flood flows would be less than significant.

4. Release of Pollutants from Inundation

Threshold: In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

Finding: No impact. (Draft EIR)

Explanation: The proposed project location is not located in a 100- or 500-year FEMA floodplain, is not located near a coast or in an area threatened by potential tsunami behavior, nor is it located near any lakes, reservoirs, or dams which would be at risk from seiche behavior. There would be no impact.

5. Water Quality Control or Sustainable Groundwater Management Plan

Threshold: Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Finding: No impact. (Draft EIR)

Explanation: As discussed in the Draft EIR, the proposed project would be required to comply with the Regional Permit, which is written specifically to ensure compliance with the Basin Plan. As coverage under the primary regulatory structure of the Basin Plan would be a project component, the proposed project would not conflict with or obstruct implementation of the Basin Plan, and there would be no impact. Further, there are no Groundwater

Sustainability Agencies or Groundwater Sustainability Plans in place for the Thousand Oaks Area Basin. There are no urban water agencies reliant upon the Basin's water and there are no local sustainable groundwater management plans in effect. In addition, the proposed project would be supplied by a water purveyor who does not utilize groundwater as a component of the water mix and the proposed project does not involve the use of groundwater. There would be no impact.

K. LAND USE AND PLANNING

1. Established Communities

Threshold: Would the project physically divide an established community?

Finding: Less than significant (Draft EIR)

Explanation: The proposed project would not physically divide an established community. The project site is developed with a vacant commercial shopping center and surface parking lot. Vehicular access to the site is currently blocked with metal posts and rails on Hampshire Road frontage and a chain-linked fence blocks access from Foothill Boulevard. The proposed project would redevelop the site with a mixed-use development with internal circulation that provides greater continuity with vehicular and pedestrian access points throughout, along with connectivity to the adjacent open space trails. The proposed project would not remove or alter existing neighborhoods but would be implemented entirely within the project site. Therefore, development under the proposed project would not result in the division of an existing community; and impacts would be less than significant.

2. Conflicts With Plans

Threshold: 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?

Finding: Less than significant. (Draft EIR)

Explanation: The City of Thousand Oaks General Plan is the principal tool used to evaluate land use proposals, as the General Plan governs land use decisions and requires project approvals be consistent with its designations and use restrictions.

As detailed in Table 4.9-1in the Draft EIR the T.O Ranch Specific Plan would largely be consistent with the General Plan Policies. Few inconsistencies with the General Plan are associated with the proposed project. For example, prior to the adoption of the General Plan Amendment, Zone Change and associated entitlements the project would exceed allowed

residential density. However, after approval of such entitlements, the project will comply with the General Plan. Further, project construction would be temporarily inconsistent with General Plan Policy N1-4, which aims to prevent future noise conflicts. As described in Section 4.12, Noise, construction noise impacts would be potentially significant and unavoidable. However, construction impacts are temporary and noise impacts would cease when project construction is completed. Therefore, after construction the proposed project would be consistent with those noise policies. Taken as a whole, although the proposed project is inconsistent with some General Plan policies, the proposed project is in harmony with the overall intent of the City's General Plan goals and policies. In addition, once the General Plan amendment is adopted, the zoning designation for the T.O. Ranch Specific Plan can be adopted and considered consistent. Therefore, the project would not conflict with any land use plan, policy, or regulation and impacts would be less than significant.

L. Mineral Resources

1. Resource Availability

Threshold: 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?

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?

Finding: No impact (Draft EIR)

Explanation: The proposed project site is located in an area classified by the California Geological Survey (CGS) as Mineral Resource Zone-1 (MRZ-1). This designation indicates that there is little likelihood that significant mineral resources are present in the area.The surrounding area does not contain any known significant mineral resources and the site is already developed with a vacant commercial facility; therefore, the proposed project would not result in the loss of known mineral resources that would be of value to the region or the residents of the state. Furthermore, the existing Thousand Oaks General Plan does not designate the site a locally important mineral resource recovery site and thus development of the proposed project would not result in the loss of availability of mineral resources. Based on this information, the proposed project would have no impact on mineral resources. NOISE

2. Airport Noise

Threshold: 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?

Finding: No impact (Draft EIR)

Explanation: Camarillo Airport is the nearest airport, located approximately 14 miles to the west of the project site. According to the noise compatibility contours shown on Exhibit H2 for the Camarillo Airport Land Use Compatibility Plan (Ventura County Airport Land Use Commission 2000), the project site is located outside the airport's 60 dBA CNEL noise contour. Therefore, no substantial noise exposure from airport noise would occur to construction workers, users, or employees of the proposed project, and no impacts would occur.

M. POPULATION AND HOUSING

1. Population Growth

Threshold: 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 road or other infrastructure?

Finding: Less than significant. (Draft EIR)

Explanation: The proposed project would develop a vacant commercial site into a mixed-use project with 420 units and new commercial space. Based on the average of 2.67 people per household in the City, the project would generate population increase of approximately 1,121, bring the City's population to 126,547 well below the project SCAG population estimated of 144,700 by 2045. As stated above, the project site is vacant and no jobs are currently associated with existing development. The addition of 420 housing units would also increase the number of housing units in the city to 48,586, an increase of less than 1 percent from current (2021) total housing units. This is below the housing unit estimate anticipated in the 2022 Housing Element and in SCAG's RHNA allocation plan, which projected up to 54,195 housing units by 2045.1 Therefore, the proposed project would not create dwelling units in excess of those anticipated by the City or SCAG planning efforts. The proposed project would include 15,000 sf. of commercial space that would generate 36 new job opportunities in the City. Further, the proposed increase is consistent with the City's latest Housing Element and facilitate the fulfillment of the city of Thousand Oaks' RHNA obligation. Therefore, the proposed project would not induce substantial unplanned population growth in the City. Impacts would be less than significant.

2. Displacement of Housing

Threshold: Would the project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere; and displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

Finding: No impact. (Draft EIR)

Explanation: Proposed project implementation would redevelop a vacant commercial site with no existing residential units and redevelop a mixed used complex with residential and commercial uses. No houses would be removed and the current commercial development is unoccupied. As the project site does not currently contain residences, the introduction of new housing units and commercial retail would not result in the displacement of a substantial number of existing housing or people, necessitating the construction of replacement housing elsewhere. No impact would occur.

N. PUBLIC SERVICES

1. Fire Protection

Threshold: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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 fire protection?

Finding: Less than significant. (Draft EIR)

Explanation: Fire protection for the project area is served by Ventura County Fire District Fire Station #30. During the project construction, construction activities associated with the development of the project site could temporarily increase demand on fire protection and EMS. These activities would be limited to the duration of the construction and would not increase long-term demand for fire protection nor require new or physically altered fire facilities. Further, existing regulation and policies would partially offset future increases in demand for fire protection services. Developers of the proposed project would be required to comply with current fire code standards. The proposed project is not anticipated to impact accessible service ratio or response times as the project would not impede emergency responses. The project is located within the five-minute response time of Ventura County Fire District, which has adequate staff at Fire Station 30 to address any project related needs for fire safety. The proposed project would not require construction of new or physically altered fire protection facilities in order to maintain acceptable service ratios, response times, or other

performance standards.. Impacts related to fire protection services would be less than significant.

2. Police Protection

Threshold: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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 Sheriff Law Enforcement Services?

Finding: Less than significant. (Draft EIR)

Explanation: Police services to the project site would be provided by Ventura County Sheriff Department (VCSD) and Thousand Oaks Police Department (TOPD). The main VCSD station is approximately six miles northwest from the project site and the nearest TOPD Resource station is located approximately one north mile from the project site.

If temporary lane closures are required for construction activities within public streets, police services may be necessary during closure periods. Although proposed project construction may result in increased demand for police services, such increase would be temporary and would be adequately served by the 700 police personnel on VCSD and Thousand Oaks Police Department staff. As mentioned in Section 4.11, Population and Housing, the proposed addition of between 420 housing units would generate an increase of approximately 1,121 residents. This would bring the city's total population to 126,547, a roughly one percent increase from the current population. This nominal increase in demand would not measurably increase response times nor warrant the construction of new police facilities to achieve response times. Therefore, the proposed project would not require construction of new or physically altered police protection facilities in order to maintain acceptable service ratios, response times, or other performance standards. Impacts related to police emergency services would be less than significant.

3. Schools

Threshold: 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?

Finding: Less than significant. (Draft EIR)

Explanation: The proposed project would be served by Conejo Valley School District (CVSD) and would add 420 new residential units and approximately 1,121 new residents to the City of Thousand Oaks. Based on the student generation factors for multifamily attached units in the CVUSD Enrollment Analysis Report, the proposed project would generate an estimated 60 elementary school students, 30 middle school students, and 41 high school students, for a total of 131 students. Since the 2000/2001 school year, the enrollment of the School District has experienced a 9.52 percent decline. The proposed project has the potential to add approximately 131 new students to the CVUSD service area. This increase would be served by the existing elementary and high schools around the project site.

Furthermore, a school impact fee would be collected for each residential unit constructed. As stated in California Government Code Section 65996, payment of school impact fees is deemed to constitute full and complete mitigation for potential impacts to schools caused by development. Therefore, impacts related to the need for new school facilities as a result of implementing the proposed project would be less than significant.

4. Parks

Threshold: 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?

Finding: Less than significant. (Draft EIR)

Explanation: Buildout of the proposed project would result in 420 residential units and an associated increase of 1,121 residents, which would generate additional demand for recreational facilities. As stated in Section 2, Project Description of the Draft EIR, the proposed project would include approximately 126,932 sf of publicly accessible open space in addition to 76,240 sf of private and common open space reserved for residents in the form of balconies, interior courtyards, and rooftop areas. These public and private open space areas would help meet the demand generated by project residents. On-site residents may also utilize existing parks in other areas of the City; however, this increase in use would be incremental and would not be expected to cause physical deterioration of existing facilities. In EIR Section 4.13, Recreation, the analysis further explains that the proposed project would comply with and exceed the City requirements for open space. The proposed project would not require additional open space facilities other than those already included within the proposed site plans. Impacts related to parks would be less than significant.

5. Other Public Facilities

Threshold: Would the project result in substantial adverse physical impacts associated with the provision of 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 other public facilities?

Finding: Less than significant. (Draft EIR)

Explanation: The proposed project would add approximately 1,121 new residents to the City of Thousand Oaks. This increase in population should not affect the city's ability to provide library space since there are currently two libraries within the proposed project vicinity as well as others within the city boundaries. Thus, the proposed project would not result in the construction of new library branches nor the expansion of existing branches. Therefore, impacts associated with other public facilities such as public libraries would be less than significant.

O. RECREATION

1. Increased Use

Threshold: 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?

Finding: Less than significant. (Draft EIR)

Explanation:

The proposed project would temporarily increase construction workers in the project area where the use of parks and recreational facilities in the immediate vicinity would be limited to lunch and other breaks. Because construction is temporary, the use of such parks and recreational facilities would be temporary and would not result in the substantial physical deterioration of the facilities. Therefore, construction impacts would be temporary and less than significant.

Operation of the proposed project would result in approximately 1,121 people, and approximately 36 employees. While the addition of residents, employees and visitors could result in an increased use of existing neighborhood and regional parks and other recreation facilities in the city of Thousand Oaks, the proposed project would also provide for 4.7 acres of new open and park spaces, in adherence to the requirements of the Thousand Oaks Municipal Code, by providing approximately 4.7 acres of public, shared, and private open space on the site. This would help offset any potential demand on parks in the vicinity of the project site. Therefore, the

project would not significantly 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. Impacts would be less than significant.

2. Construction and Expansion

Threshold: 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?

Finding: Less than significant. (Draft EIR)

Explanation: The proposed project would generate a total of 4.7 acres of open spaces areas and amenities to serve the users of the site The inclusion of new private recreational facilities and open space areas for outdoor recreation would either improve existing facilities (trailheads) or be constructed on a previously developed and currently abandoned commercial project site so implementation would provide long-term benefits by improving existing site conditions. The physical environmental effects of constructing these facilities within the proposed project are analyzed in the entirety of the Draft EIR and no additional, adverse permanent impacts would occur. Impacts would be less than significant.

P. TRANSPORTATION / TRAFFIC

1. Plans, Policies, and Ordinances

Threshold: Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Finding: Less than significant. (Draft EIR)

Explanation: The proposed project is consistent several regionally- and locally adopted land use plans, policies, and regulations apply to the proposed project. These include the SCAG 2020-2045 RTP/SCS, the City of Thousand Oaks General Plan, and the City of Thousand Oaks Active Transportation Plan (ATP).

While the proposed project is inconsistent with the current land use designation, approval of the project with the General Plan Amendment and Zone Change would result in a development consistent with updated General Plan. Therefore, impacts related to consistency with plans and policies would be less than significant.

2. VMT

Threshold: Would the project generate Vehicle Miles Traveled (VMT) per Capita above the existing baseline citywide VMT per Capita within the project traffic analysis zone (TAZ) (60185701)?

Finding: Less than significant. (Draft EIR)

Explanation: As shown in Table 4.14-2 of the Draft EIR, the proposed project is anticipated to generate an average daily residential VMT per Capita within the project TAZ that is 29 percent below the citywide average. Based on an administrative policy adopted by the City of Thousand Oaks the residential component of the proposed project would not result in a significant transportation impact related to VMT. This impact would be less than significant.

As discussed previously, the retail component of the proposed project met the requirements to screen out of further CEQA analysis. Therefore, impacts resulting from VMT related to retail and commercial uses would be less than significant.

3. Explanation: Design Hazards

Threshold: Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Finding: Less than significant. (Draft EIR)

Explanation: The proposed project would not alter or affect the existing street and intersection networks in its vicinity, nor increase hazards due to a new geometric design feature. Therefore, the proposed project would not substantially increase hazards due to a geometric design feature.

The proposed mixed-use multi-family residential project would be consistent with existing commercial and residential uses in its vicinity. The proposed project would not introduce incompatible uses, including vehicles or equipment, to the project site or the surrounding area. A General Plan amendment would be required to change the project site's current "Commercial" land use designation to "Commercial/Residential." Approval of the proposed project, along with approval of the General Plan amendment, would result in development consistent with the existing General Plan. Therefore, the proposed project would no results in increased hazards from incompatible land uses, and the impact is less than significant.

4. Emergency Access

Threshold: Would the project result in inadequate emergency access?

Finding: Less than significant. (Draft EIR)

Explanation: The proposed project would adhere to the Ventura County Fire Protection District, Fire Prevention Division Standard Planning Conditions pertaining to street widths; length, width, and percent grade of private access roads; number and type of turnaround areas and means of ingress and egress; minimum vertical clearances; and percent grade. Staging equipment and temporary work areas utilized during construction of the proposed project would be located within the project site and would not require closure of existing roadways in the vicinity of the proposed project. As a result, the proposed project would not result in inadequate emergency access. This impact would be less than significant.

Q. UTILITIES AND SERVICE SYSTEMS

1. New or Expanded Utilities

Threshold: 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?

Finding: Less than significant. (Draft EIR)

Explanation: The proposed project would require an assessment of Southern California Edison (SCE), telecommunications services, and SoCalGas to address the site conflicts and follow through with the removal and installation of required services proposed by the Dry Utility Due Diligence and Conflict Report. The proposed project would be required by SCE and SoCalGas to comply with the California Energy Code and California Green Building Standards Code (CALGreen Code) see Section 4.5, Energy.

2. Water Supplies

Threshold: Would the project have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Finding: Less than significant. (Draft EIR)

Explanation: The project site receives its water supply from the City of Thousand Oaks. As previously described, the City purchases all of its water from the Calleguas Municipal Water District (CMWD), via the Metropolitan Water District (MWD). The City of Thousand Oaks 2020 Urban Water Management Plan (UWMP) projects future water demand and supply for the city through 2045. The UWMP has confirmed that it anticipates having sufficient supplies to meet City imported water demands through 2045 and shows surplus supplies in all water year types . Water would be required for temporary construction activities on the project site, including grading and

drainage. The conceptual drainage and treatment systems for this project, analyzed by Stantec Consulting Services (Appendix J in the Draft EIR), indicates reduced water consumption have been designed in accordance with the requirements of the City of Thousand Oaks, using the methods prescribed in the County of Ventura Hydrology Manual. Therefore, the proposed project would not exhaust water needs for either construction or long-term demands. Impacts would be less than significant.

3. Wastewater Capacity

Threshold: 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?

Finding: Less than significant. (Draft EIR)

Explanation: The analysis presented in Sewer Capacity Study prepared by Stantec in November 2021 (Appendix J in the Draft EIR) confirms the existing sanitary sewer infrastructure surrounding the subject property will be adequate to serve the proposed project. Using the calculation methods described in the Draft EIR, the existing sewer mainline in Hampshire Road will be approximately 50 percent utilized by the proposed project thereby, satisfying the requirements found in the 1979 Wastewater Design and Construction Standards. Therefore, the proposed project would not exhaust wastewater needs for either construction or long-term demands. Impacts would be less than significant.

4. Solid Waste Reduction Goals

Threshold: 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?

Finding: Less than significant. (Draft EIR)

Explanation: The proposed project does not have a current projected solid waste estimation, at this time. However, as previously mentioned, the daily permitted limit of accepted waste is 3,000 tons, and the Simi Valley landfill currently accepts an average of about 2,800 tons per day, or about 93 percent of its permitted daily capacity . The Simi Valley Landfill and Recycling Center can accept 6,250 tons of recyclable material per day. The landfill has a total capacity of 43.5 million cubic yards, with a remaining capacity of 22.3 million cubic yards (as of March 2006). The applicant would have to confirm that the projected solid waste estimate would meet the capacity of 2,800 tons per day for impacts to be less than significant.

5. Solid Waste

Threshold: Will the project comply with federal, state, and local statutes and regulations related to solid waste?

Finding: Less than significant. (Draft EIR)

Explanation: The proposed project does not at this time have a projected solid waste estimation. However, the proposed project would comply with federal and state local regulations related to solid waste regarding mixed use and commercial spaces. If when the applicant receives a projected estimate that exceeds local standards or regulations then mitigation would be required. Assuming the generated solid waste estimate falls below capacity, no mitigation would be required and impacts would be less than significant.

R. WILDFIRE

1. Response Plans

Threshold: Would the project substantially impair an adopted emergency response plan or emergency evacuation plan (if located in or near state responsibility areas or lands classified as very high fire hazard severity zones)?

Finding: Less than significant. (Draft EIR)

Explanation: The proposed project site is located within a Local Responsibility Area Very High Fire Hazard Severity Zones (FHSZ) with ingress and egress to and from the site provided by Hampshire Road and Foothill Drive. Impairment of emergency response or emergency evacuation plans could occur construction or during operation of the proposed project. Construction would be required to prepare a construction management that adheres to the guidelines and the precepts of the Ventura County Multi-District Hazard Mitigation Plan, and the latest version of the City of Thousand Oaks General Plan Safety Element. Therefore, construction activities would not substantially impede emergency vehicle access or impair an emergency response plan or evacuation plan. Construction impacts would be less than significant.

Proposed project construction would develop a cluster of 15 buildings with up to 420 dwelling units on the site with a 30-foot-wide fire access lane around all buildings. The VCFD enforces design and access standards (determined by the Ventura County Fire Code (VCFC) or other regulatory agencies, described earlier) to ensure a development does not impact emergency access or evacuation plans. Such requirements include that all exteriors of buildings are not located more than 150 feet from a fire access lane and that fire access lanes allow for a 50-foot inside turning radius at all turns in the road (VCFC, California Code of Regulations (CCR) T-14 Fire

Safe Regulations (FSR). Adherence with such standards would ensure that operation of the proposed project would not impact an adopted emergency response plan or emergency evacuation plan.

During operation of the proposed project, up to 1,121 residents and an unknown number of others accessing commercial, restaurant, and office uses could be on the site at any time. If evacuation orders were issued for the site during operation, residents would exit the proposed project site onto Foothill Drive and/or Hampshire Road where vehicles could either travel north to enter nearby US-101 using onramps to either the northbound and southbound directions or travel south and turn north on Westlake Boulevard and enter the US-101 . This is the second nearest freeway access point and provides onramps to either the northbound and southbound directions. Travel distance to either freeway entry is short (approximately 600 feet and approximately 1.25 miles, respectively). Both roads have at least two travel lanes available to reach the freeway, each designed to accommodate 1,600 vehicles per hour (Appendix I of the Draft EIR). Given the immediate access to evacuation routes, close access to the freeway, and placement within an urbanized locale (i.e., a lack of wildland areas susceptible to wildfire between the proposed project and the freeway), residents of the proposed project would not encounter or create significant impediments to evacuation.

As discussed in the Wildfire Technical Study (Appendix I of the Draft EIR), the VCFD and Ventura County Sheriff's Office of Emergency Services indicate that the proposed project would not create an impediment to potential evacuations. Evacuation warnings or evacuation orders are issued according to conditions as wildfires are inherently dynamic and unpredictable. Evacuation warnings and orders may be made in a phased manner according to vulnerability, location, or other factors, which would enable traffic surges on roadways to be minimized over time allowing for more an orderly flow of vehicles exiting an evacuation area.

Although the proposed project site is located in a Very High FHSZ, the site itself is urban infill development in an already urbanized area. Urban infill projects utilize existing facilities and do not require a substantial reorganization, expansion, or extension of services as they do not expand development into the Wildland Urban Interface (WUI) and therefore do not exacerbate wildfire risk. According to CALFIRE, structures in the WUI are at greater risk of being burned simply because the WUI is where fuel (wildlands) and people meet, and an increase in WUI is therefore an increase in fire hazard (CALFIRE 2018). Infill urban development and redevelopment are considered by planning professionals to be the best means of increasing the housing stock without increasing wildfire risks (Appendix I of the Draft EIR). Urban landscapes are far less susceptible to the hazards of wildfire and fire in general, compared to exurban or suburban WUI development (CALFIRE 2018).

The proposed project constitutes urban infill development and would be required to adhere to all adopted federal, State, and local development guidelines that govern wildfire, emergency services, and emergency access, and evacuation routes. Therefore, project implementation would not substantially impair an adopted emergency response plan or evacuation plan and impact would be less than significant.

2. Pollutant Concentrations

Threshold: 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 (if located in or near state responsibility areas or lands classified as very high fire hazard severity zones)?

Finding: Less than significant. (Draft EIR)

Explanation: Thousand Oaks is an area prone to wildland fires due to its climate and topography, and the city has a significant history of wildfire events. Development facilitated by the proposed project would increase the population up to 1,121 people by increasing residential development and commercial and restaurant uses. Development under the proposed project would primarily be infill, in areas where single-family and multi-family residential, medical, and other commercial uses currently exist.

According to the Wildfire Technical Study (Appendix I of the Draft EIR), prevailing winds in the area tend to blow to the southeast from May to September and southwest from September to February, with more variable patterns between March and May. The Santa Ana winds generally blow to the southwest, which would be away from the proposed project site, but historically this has not prevented fires from impacting the area near where the site is located.

All components associated with the proposed project would be subject to the CBC regulations governing fire protection and activities on the site would be subject to local and regional restrictions on use or operation during high fire-risk conditions (e.g., open fires or barbeques, use of landscaping equipment that could cause sparks). Proposed project features (flat non-combustible roof and vertical non-combustible cladding on exterior walls, etc.), in combination with all the buildings being equipped with fire-sprinklers would assure risks associated with development catching fire and spreading fire that exposes project occupants to the pollutant concentrations of a wildfire would be reduced. Additionally, all landscape for the proposed project would be required to be reviewed by the VCFD. Furthermore, project landscaping would be required to meet VCFD and State fire safety requirements for defensible space and be routinely maintained and not allowed to become dry or overgrown such that it would create a fire hazard,

based on project design plans (Appendix I of the Draft EIR). Therefore, the project would not exacerbate wildfire risk.

Implementation of fire protection features standardized in the CBC and implemented by the Thousand Oaks Municipal Code would limit the potential for the proposed project to exacerbate wildfire and compliance with local and regional orders designed to limit exposure toke would protect residents and visitors from pollutants to the degree possible. Therefore, this impact would be less than significant.

3. Infrastructure Risks

Threshold: Would the project require the installation or maintenance of associated infrastructure (such a 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?

Finding: Less than significant. (Draft EIR)

Explanation: The project site is developed with a commercial center and large, surface parking area; associated infrastructure includes powerlines and emergency water sources. The site is surround by existing public roads to the east, south, and west, all of which provide fuel breaks and fire access. Given the urban setting of the project site, the proposed project would not require the installation or maintenance of infrastructure beyond normal construction activity such as roads, fuel breaks, emergency water sources, power lines, or other utilities that may exacerbate fire risk or result in temporary or ongoing impacts to the environment. In addition, the proposed project would not result in an extension into the WUI. The project would be required to install fire hydrants; however, fire hydrants would only be placed in currently developed areas. Furthermore, above-ground electrical transmission like and associated components along Foothill Drive, on the western edge of the project site and between the Conejo Ridge Open Space, would be undergrounded during project implementation. The undergrounding of new electrical power connections would minimize potential ignition and related fire risk. Because all proposed project activities would be confined to the project site and would not encroach on the nearby open space, which is classified as Very High FHSZ, the installation and maintenance of all infrastructure associated with the project construction and operation would not affect the Very High FHSZ. Proposed project implementation would not increase risk for fire or result in temporary or ongoing impacts to the environment in the Very High FHSZ. Impacts would be less than significant .

4. Post-Fire Risks

Threshold: Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Finding: Less than significant. (Draft EIR)

Explanation: Given that the proposed project site is currently developed with a commercial center and parking lot, changes to the site would not impact downslope or downstream flooding or landslides because of run off, post-fire instability, or drainage changes. Neither the proposed project nor the surrounding area is within a flood plain or flood area (FEMA 2020). The site is flat and was previously engineered with appropriate grading and foundations, in accordance with local building codes. The geology of the project site has been proven as stable through decades of previous occupancy by the former commercial uses. Because of the surrounding urban development, firefighting capabilities, and access to infrastructure, a catastrophic fire on the project site would be unlikely. However, if a fire were to occur on site, no landslide, downslope, or downstream flooding condition would be created because the site is topographically flat and has been previously graded. Furthermore, historic wildfires that affected the Conejo Ridge Open Space, a Very High FHSZ, did not produce post-fire landslides during ensuing rain events.

As discussed in the Draft EIR, the proposed project would decrease the amount of impervious surface on the site, increase the capacity for natural water infiltration and potentially reduce the extent of downslope flooding. Furthermore, a retaining wall at the western edge of the project site would be designed to comply with the City Building Code and the specifications of the proposed project's geotechnical report, which would assure stability to current standards and avoid landslide impacts.

Adherence to all building codes and all applicable State and local regulations, would ensure the project development would not exacerbate the risk of wildfire or expose people or structures to significant risks, including downslopes or downstream flooding or landslides, because of runoff, post-fire slope instability, or drainage changes. Therefore, this impact would be less than significant.

SECTION III.
IMPACTS THAT ARE LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

The City Council hereby finds that changes or alterations in the form of Mitigation Measures have been required in, and incorporated into, the project which avoid and/or substatnailly lessen the significant environmental effects identified in the EIR to a less than significant level. The potentially significant impacts, and the Mitigation Measures that will reduce them to a less than significant level, are as follows:

A. BIOLOGICAL RESOURCES

1. Sensitive Species

Threshold: 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?

Finding: Less than significant with mitigation (Draft EIR) Changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effects as identified in the EIR. (State CEQA Guidelines, section 15091(a)(1).)

Explanation: Several bird species, including those observed on the proposed project site, have adapted to urbanized areas where vegetation is present, and some are known to construct nests on buildings. The landscaped vegetation located on an adjacent to the proposed project site does not provide suitable habitat for special-status wildlife and the site does not provide habitat suitable for special-status plants to occur. The developed open space to the west of Foothill Road may provide suitable habitat to native wildlife, including nesting birds and terrestrial species; however, construction of the proposed project would not present new impacts when considering the surrounding built environment. Furthermore, operation of the proposed project would be consistent with current conditions and would not present new impacts to wildlife that may occur on adjacent parcels.

The ornamental landscaping on the proposed project site can support common nesting bird and raptor species, including Cooper's hawk, a CDFW "Watch List" species, that has a moderate potential to occur. Although no active or inactive nests were observed, birds may nest onsite, and passerine species, such as barn swallows (Hirundo rustica) and house finch (Haemorhous mexicanus), can nest in the eaves of the vacant structures on the site.

The proposed project site provides poor habitat for roosting bat species;

however, there is potential that bats could roost within the vacant buildings.

Direct impacts resulting from proposed project activities conducted during the bird nesting season (typically February 1 through August 31) could include mortality during vegetation removal and building demolition. Indirect impacts to birds that may nest in adjacent vegetation could result from noise, vibrations, and dust from construction activities that could cause nesting birds to flush out of cover and become exposed to predators or vehicle strikes. Additionally, flushed adults may not return to nests, predators may feed on eggs or chicks in unprotected nests, or vibrations could cause eggs to fall out of nests. Similarly, building demolition could impact roosting bats, if present. Direct or indirect impacts to nesting birds or roosting bats that lead to individual mortality or harassment would be considered significant. In response to comments from State of California Department of Fish and Wildlife (CDFW), Mitigation Measure BIO-1 was revised to extend the nesting season from February 1 through August 31 to January 1 through September 15, and to require that preconstruction surveys be performed seven days prior to initiation of ground-disturbing activity, instead of three days. These changes do not constitute significant new information pursuant to CEQA Guidelines Section 15088.5. Implementation of Mitigation Measure BIO-1 would reduce impacts to nesting birds to less than significant.

MM BIO-1 *Bat and Nesting Bird Survey and Avoidance*: Project-related activities shall occur outside of the bird breeding season (generally between January 1 throughSeptember 15) to the extent practicable. If construction must occur within the bird breeding season, no more than seven days prior to initiation of ground-disturbing activities (including, but not limited to site preparation, grading, excavation, and trenching) within the proposed project site, a bird pre-construction bird nest survey shall be conducted by a qualified biologist within the disturbance footprint plus a 100-foot buffer (300-foot for raptors), where feasible. If the proposed project is phased or construction activities stop for more than one week, a subsequent pre-construction nesting bird survey shall be required within three days prior to each phase of construction.

Pre-construction nesting bird surveys shall be conducted during the time of day when birds are active and shall factor in sufficient time to perform this survey adequately and completely. During the nest survey, the biologist shall inspect the outside and inside of the vacant structures for sign of roosting bats, such as presence of guano or direct observations. A report of the bat and nesting bird survey results, if applicable, shall be submitted to the City for review and approval prior to ground and/or vegetation disturbance activities.

If bird nests are found, an appropriate avoidance buffer ranging in size from 25 to 50 feet for passerines, and up to 300 feet for raptors depending

upon the species and the proposed work activity, shall be determined and demarcated by a qualified biologist with bright orange construction fencing or other suitable material. Active nests shall be monitored at a minimum of once per week until it has been determined that the young have fledged the nest. No ground disturbance or vegetation removal shall occur within this buffer until the qualified biologist confirms that breeding/nesting has ended, and all the young have fledged. If no nesting birds are observed during pre-construction surveys, no further actions would be necessary.

If evidence of bat roosting is observed, building demolition shall not be allowed until a qualified biologist can verify that the roost is no longer active. If necessary, bats may be evicted and building demolished following submittal and approval of a Bat Avoidance Plan by CDFW.

The City Council adopts Mitigation Measure BIO-1 and finds that it is feasible, and that it will further reduce impacts to sensitive species. Accordingly, the City Council finds that, pursuant to Public Resources Code section 21081(a)(1) and State CEQA Guidelines section 15091(a)(1), changes or alterations have been required in, or incorporated into, the Project that mitigate or avoid the potentially significant impacts of the Project regarding sensitive species, as identified in the EIR. Therefore, impacts are considered less than significant. Mitigation measures will further reduce impacts to sensitive species.

2. Protected Trees

Threshold: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Finding: Less than significant with mitigation. (Draft EIR) Changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effects as identified in the EIR. (State CEQA Guidelines, section 15091(a)(1).)

Explanation: There are eight City protected coast live oak and two City protected landmark California sycamore trees present on the proposed project site. Proposed project activities, including demolition of existing vacant structures, and grading and excavation on site would require the three coast live oak trees be removed and nine coast live oak trees shall be planted onsite as replacement per Mitigation Measure BIO-2. In response to comments from State of California Department of Fish and Wildlife (CDFW), Mitigation Measure BIO-2 was revised to incorporate an inspection of diseases, pests, or pathogens prior to protected tree removal and the 5-year monitoring period for replacement trees. These changes do not constitute significant new information pursuant to CEQA Guidelines Section 15088.5. Potentially significant impacts to protected trees would be mitigated to less than significant levels by implementation of Mitigation

Measure BIO-2.

MM BIO-2 *Minimize Impacts to Protected Trees*: The project shall take all necessary actions to comply with the requirements of the City's Oak Tree Preservation and Protection Guidelines and Oak and Landmark Tree Ordinance. These include preserving protected trees located on the project site whenever possible. A permit is required by the City before the start of project activities if any tree will be trimmed, cut, or removed.

- In accordance with the City of Thousand Oaks Tree Protection Guidelines the oak trees on the project site that would be removed shall be replaced at a ratio of 3:1 with two 24-inch box coast live oak trees and one 36-inch or 60-inch box coast live oak tree. Three coast live oak trees will be removed; therefore, nine coast live oak trees shall be planted onsite.
- An arborist shall conduct an inspection of diseases, pests or pathogens prior to protected tree removal and any infected trees be disposed using best available management practices relevant for each tree disease observed.
- All mitigation oak and landmark trees shall be monitored annually for a period of 5 years following installation. All mitigation oak trees shall be in good-to-excellent health at the end of the 5 year monitoring period and any trees that die or are in fair-to-poor health at the end of the 5 year monitoring period must be replaced with a healthy tree, and the replacement tree(s) shall be monitored for a period of 5 years until every mitigation tree is in good-to-excellent health 5 years after installation.

The City Council adopts Mitigation Measure BIO-2 and finds that it is is feasible, and that it will further reduce impacts to protected trees. Accordingly, the City Council finds that, pursuant to Public Resources Code section 21081(a)(1) and State CEQA Guidelines section 15091(a)(1), changes or alterations have been required in, or incorporated into, the Project that mitigate or avoid the potentially significant impacts of the Project regarding protected trees, as identified in the EIR. Therefore, impacts are considered less than significant. Mitigation measures will further reduce impacts to protected trees.

B. CULTURAL AND TRIBAL RESOURCES

1. Archaeological Resources

Threshold: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines, section 15064.5?

Finding: Less than significant with mitigation. (Draft EIR) Changes or alterations

have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effects as identified in the EIR. (State CEQA Guidelines, section 15091(a)(1).)

Explanation: It is known that archaeological resources are present throughout Ventura County. The California Historical Resources Information System (CHRIS) search results indicate no prehistoric or historic-period archaeological resources have been recorded within the project site. The closest archaeological resource identified by the records search is a prehistoric lithic scatter located approximately 0.20-mile from the project site. The project site is developed with existing structures, hardscape, walls, and landscape, and much of the original topography of the site has been replaced by grading, utility installment, paving, and buildings. The potential to encounter unidentified archaeological resources within the project site is considered low given the previous development of the site. Nonetheless, it is possible that undisturbed soils beneath the project site may contain previously unidentified archaeological resources in buried contexts. Ground disturbance during project construction could result in impacts to such archaeological resources. Therefore, implementation of Mitigation Measure CUL-1 would be required to reduce potential impacts to previously undiscovered archaeological resources to a less than significant level.

MM CUL-1 *Archaeological Resource Discovery Protocol*: If archaeological deposits are encountered during project-related ground disturbing activities, then a cultural resource "discovery" protocol will be followed. If historic or prehistoric features or artifact concentrations are encountered during project grading within native soils or original context, then all work in that area will be halted or diverted 30 feet away from the discovery until a qualified archaeologist is contacted and evaluates the nature and/or significance of the find(s). If the discovery is prehistoric in origin, a Native American representative will be contacted to participate in the evaluation. If an archaeologist confirms that the discovery is potentially significant, then the Lead/Permitting Agency will be contacted and informed of the discovery. Construction will not resume in the locality of the discovery until consultation between the qualified archaeologist, the Applicant's project manager, the Lead/Permitting Agency, and any other concern parties (such as additional regulatory agencies or Native American Tribal Groups), takes place and reaches a conclusion approved by the Lead/Permitting Agency. If a significant cultural resource is discovered during earth-moving, complete avoidance of the find is preferred. However, if the discovery cannot be avoided, data recovery of the significant resource may be required by the City. The City may also require site monitoring, based on the discovery. All individual reports will be submitted to the South Central Coastal Information Center (SCCIC) at the conclusion of the project.

The City Council adopts Mitigation Measure **CUL-1,** and finds that it is feasible and that it will further reduce impacts to archaeological resources.

Accordingly, the City Council finds that, pursuant to Public Resources Code section 21081(a)(1) and State CEQA Guidelines section 15091(a)(1), changes or alterations have been required in, or incorporated into, the Project that mitigate or avoid the potentially significant impacts of the Project regarding archaeological resources, as identified in the EIR. Therefore, impacts are considered less than significant. Mitigation measures will further reduce impacts to archaeological resources.

2. Human Remains

Threshold: Would the project disturb any human remains, including those interred outside of formal cemeteries?

Finding: Less than significant with mitigation. (Draft EIR) Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effects as identified in the EIR. (State CEQA Guidelines, section 15091(a)(1).)

Explanation: Humans have occupied Ventura County for over 10,000 years and it is not always possible to predict where human remains may occur outside of formal burials. Therefore, excavation and construction activities, regardless of depth, may yield human remains that may not be interred in marked, formal burials. Under CEQA, human remains are protected under the definition of archaeological materials as being "any evidence of human activity." Additionally, PRC Section 5097 has specific stop-work and notification procedures to follow in the event that human remains are inadvertently discovered during project implementation. Ground-disturbing construction activity associated with the project may result in the discovery of human remains. Implementation of Mitigation Measure CUL-2 would be required to ensure that human remains, if discovered, would be properly treated and impacts would be reduced to a less than significant level.

MM CUL-2 *Inadvertent Discovery of Human Remains*: The inadvertent discovery of human remains is always a possibility during ground disturbances; State of California Health and Safety Code Section 7050.5 addresses this possibility. This code section states that in the event human remains are uncovered, no further disturbance shall occur until the County Coroner has made a determination as to the origin and disposition of the remains pursuant to Public Resource Code (PRC) Section 5097.98. The County Coroner must be notified of the find immediately, along with the Lead/Permitting Agency and the Applicant. If the human remains are determined to be prehistoric, the County Coroner will notify the Native American Heritage Commission (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. The Lead/Permitting Agency and a qualified archaeologist shall also establish additional appropriate mitigation measures for further site construction, in consultation with the MLD.

The City Council adopts Mitigation Measure **CUL-2,** and finds that it is feasible and that it will further reduce impacts to archaeological resources. Accordingly, the City Council finds that, pursuant to Public Resources Code section 21081(a)(1) and State CEQA Guidelines section 15091(a)(1), changes or alterations have been required in, or incorporated into, the Project that mitigate or avoid the potentially significant impacts of the Project regarding human remains, as identified in the EIR. Therefore, impacts are considered less than significant. Mitigation measures will further reduce impacts to human remains.

C. GEOLOGY AND SOILS

1. Seismic Ground Shaking

Threshold: Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

Finding: Less than significant with mitigation. (Draft EIR) Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effects as identified in the EIR. (State CEQA Guidelines, section 15091(a)(1).)

Explanation: The proposed project site is located within the seismically active southern California region. Consequently, seismic ground shaking and associated geologic phenomena such as soil expansion and collapse could potentially damage onsite structures and pose risks to human safety. Such impacts would be potentially significant.

One of the geotechnical concerns evaluated at this site during the Twining analysis in 2005 is the expansion potential of the near surface soils. Over time, expansive soils experience cyclic drying and wetting as the dry and wet seasons pass and therefore volumetric changes (shrink/swell) as the moisture content of the clayey soils fluctuate. These shrink/swell cycles can impact foundations and lightly loaded slabs-on-grade when not designed for the anticipated expansive soil pressures. The potential for damage to slabs-on-grade and foundations supported on expansive soils can be reduced by placing non-expansive sections underlying foundations and slabs-on-grade.

In evaluation of the expansive soils, test results indicated the underlying materials have a medium expansion potential in the 51-90 Expansion Index range (Gorian 2021). Expansive soils could cause damage to the proposed structures. In order to reduce impacts to the proposed project from expansive soils, Mitigation Measure GEO-1a is proposed to aid in the protection of proposed structures. Mitigation Measure GEO-1a discusses specific recommendations regarding expansive soils, as outlined in the Twining Geotechnical Report.

Additionally, the UBC and the CBC include building standards to ensure that the design and construction of new structures are engineered to withstand the expected ground acceleration that may occur at this site. Earthquake resistant designs include such measures as concrete framing, flexible building diaphragms, anchoring concrete or masonry wall, framing below the base, building separation, and collector elements for seismic stresses.

Implementation of the most recent industry standards for structure designs, in combination with Mitigation Measures GEO-1a and GEO-1b, would reduce the potential for structural failure due to seismic ground shaking to a less than significant level. **MM GEO-1a** *Geotechnical Recommendations:* The geotechnical recommendations contained in the 2005 Twining Geotechnical Report shall be fully implemented. Among the study recommendations are specific parameters relating to:

- Foundation Design – over-excavation and compaction for foundations, soil stabilization, shoring, etc., conducted as indicated in the geotechnical report
- Structural Fills – the applicant shall comply with the recommendations contained in the Twining September 13, 2005 geotechnical report regarding site preparation. This includes over-excavating on-site soils so that new foundations are supported on a minimum of two feet of engineered fill or engineered fill extending to a depth of five feet below preconstruction site grades, whichever provides the deeper fill. These recommendations shall be fully implemented in order to comply with UBC standards and would reduce impacts to a less than significant level
- Structural Footings – minimum footing embedment depths, widths, and net vertical soil bearing pressures
- Concrete Slabs – testing of exposed subgrades prior to concrete pours, reinforcement of concrete slabs, use of moisture barriers or sand layers beneath slabs
- Site Preparation – compliance with SWPPP and SWPCP requirements

Additionally, the 2021 Gorian report recommended the following site design features:

- Positive drainage should be continuously maintained away from structures and slopes. Ponding or trapping of water in localized areas near the foundations can cause differential moisture levels in subsurface soils. Plumbing leaks should be immediately repaired so that the subgrade soils underlying the structure do not become saturated.
- Trees and large shrubbery should not be planted where roots can grow under foundations and flatwork when they mature.
- Landscape watering should be held to a minimum; however, landscaped areas should be maintained in a uniformly moist condition and not

allowed to dry-out. During extreme hot and dry periods, adequate watering should be provided to keep soil from separating or pulling back from the foundations.

Prior to the issuance of building permits, a qualified Geotechnical Engineer retained by the applicant shall provide evidence to the City of Thousand Oaks Engineer that the geotechnical mitigation measure GEO-1a is implemented as described above.

MM GEO-1b Geotechnical Oversight: A qualified Geotechnical Engineer shall be retained to perform the following tasks prior to and during construction:

- Foundation Design – over-excavation and compaction for foundations, soil stabilization, shoring, etc., conducted as indicated in the geotechnical report
- Structural Fills – the applicant shall comply with the recommendations contained in the Twining September 13, 2005 geotechnical report regarding site preparation. This includes over-excavating on-site soils so that new foundations are supported on a minimum of two feet of engineered fill or engineered fill extending to a depth of five feet below preconstruction site grades, whichever provides the deeper fill. These recommendations shall be fully implemented in order to comply with UBC standards and would reduce impacts to a less than significant level
- Structural Footings – minimum footing embedment depths, widths, and net vertical soil bearing pressures
- Concrete Slabs – testing of exposed subgrades prior to concrete pours, reinforcement of concrete slabs, use of moisture barriers or sand layers beneath slabs
- Site Preparation – compliance with SWPPP and SWPCP requirements

Additionally, the 2021 Gorian report recommended the following site design features:

- Positive drainage should be continuously maintained away from structures and slopes. Ponding or trapping of water in localized areas near the foundations can cause differential moisture levels in subsurface soils. Plumbing leaks should be immediately repaired so that the subgrade soils underlying the structure do not become saturated.
- Trees and large shrubbery should not be planted where roots can grow under foundations and flatwork when they mature.
- Landscape watering should be held to a minimum; however, landscaped areas should be maintained in a uniformly moist condition and not allowed to dry-out. During extreme hot and dry periods, adequate watering should be provided to keep soil from separating or pulling back from the foundations.

Prior to the issuance of building permits, a qualified Geotechnical Engineer retained by the applicant shall provide evidence to the City of Thousand Oaks Engineer that the geotechnical mitigation measure GEO-1a is implemented as described above.

The City Council adopts Mitigation Measures GEO-1a and GEO-1b, and finds they are feasible and that they will further reduce impacts related to strong seismic ground shaking. Accordingly, the City Council finds that, pursuant to Public Resources Code section 21081(a)(1) and State CEQA Guidelines section 15091(a)(1), changes or alterations have been required in, or incorporated into, the Project that mitigate or avoid the potentially significant impacts of the Project regarding seismic ground shaking, as identified in the EIR. Therefore, impacts are considered less than significant. Mitigation measures will further reduce impacts related strong seismic ground shaking.

2. Unstable Geologic Unit or Soil

Threshold: 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?

Finding: Less than significant with mitigation. (Draft EIR) Changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effects as identified in the EIR. (State CEQA Guidelines, section 15091(a)(1).)

Explanation: The proposed project site is generally flat, and according to the California Seismic Hazard Map, the city is not located within an earthquake-induced landslide hazard zone (California Department of Conservation 2019). Therefore, potential impacts associated with landslides would be less than significant.

The proposed project does not include installation of new groundwater wells or use of groundwater from existing wells that would create subsidence impacts. In addition, the pumping of oil and gas and mining do not occur in the vicinity of the proposed project site. Furthermore, the proposed project site is not located in a Liquefaction Zone and characterized as having a low potential for liquefaction. Therefore, potential impacts associated with subsidence and liquefaction would be less than significant.

Lateral spreading is the horizontal movement or spreading of soil toward an open face. The potential for failure from subsidence and lateral spreading is highest in areas where the groundwater table is high and where relatively soft and recent alluvial deposits exist. Groundwater was not encountered in any of the borings drilled at the proposed project site in 2004 by Twining.

Based on the lack of free water in the open boreholes and the moisture content of the collected soil sample, it was concluded that groundwater existed at a depth in excess of 50 feet at the time of subsurface exploration. However, the soils encountered at the boring locations possessed moisture content in excess of the optimum moisture content. Mitigation Measure GEO-2 would require subsurface soil stabilization should unstable soils be encountered during excavation. Therefore, impacts related to unstable soils would be less than significant with mitigation.

MM GEO-2 ***Site Preparation:*** Based on the nature of the subsurface soil conditions, it should be anticipated that unstable soil conditions would be encountered during excavation and installation of slabs-on-grade, foundations, utilities, etc. Therefore, the soils may require stabilization. Soils shall be stabilized in accordance with the Twining Report (2005), including the procedures in the Appendices for Chemical Treatment of Soil. Stabilization of the subgrade soils shall be performed in a uniform manner. If stabilization of the subgrade soils is necessary, it shall be performed in the entire building area, including the overbuild zone. Additionally, all recommendations provided in the Gorian Report (2021) regarding soil expansiveness shall be implemented, evidence of implementation shall be provided to the City engineer prior to the issuance of a grading permit.

The City Council finds Mitigation Measures GEO-2 is feasible, is adopted, and will further reduce impacts related to unstable geological unit(s) or soil(s). Accordingly, the City Council finds that, pursuant to Public Resources Code section 21081(a)(1) and State CEQA Guidelines section 15091(a)(1), changes or alterations have been required in, or incorporated into, the Project that mitigate or avoid the potentially significant impacts of the Project regarding unstable geological unit(s) or soil(s)., as identified in the EIR. Therefore, impacts are considered less than significant. Mitigation measures will further reduce impacts related unstable geological unit(s) or soil(s).

3. Expansive Soils

Threshold: 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?

Finding: Less than significant with mitigation. (Draft EIR) Changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effects as identified in the EIR. (State CEQA Guidelines, section 15091(a)(1).)

Explanation: Soil expansion tests were performed by Gorian in 2021 on representative soil samples obtained from the property. Results indicate the subsurface materials have a medium expansion potential.

Expansion potential may not manifest itself until months or years after construction. Swelling soils can cause distress to walks, structures, patio slabs, and drains . Therefore, impacts would be potentially significant but mitigable. The potential for damage to slabs-on-grade and foundations supported on expansive soils can be reduced by placing non-expansive sections underlying foundations and slabs-on-grade. Through compliance with site-specific geotechnical recommendations from the 2005 Twining study for expansive soils as required by Mitigation Measure GEO-1a and GEO-2, in addition to the geotechnical oversight as required under Mitigation Measure GEO-1b, the proposed project would not create substantial direct or indirect risk to life or property due to the presence of expansive soils. Therefore, impacts related to expansive soils would be less than significant with mitigation.

Implementation of Mitigation Measures **GEO-1a**, **GEO-1b**, and **GEO-2** would reduce impacts to less than significant.

The City Council adoptss Mitigation Measures **GEO-1a**, **GEO-1b**, and **GEO-2**, and finds they are feasible and that they will further reduce impacts to expansive soils. Accordingly, the City Council finds that, pursuant to Public Resources Code section 21081(a)(1) and State CEQA Guidelines section 15091(a)(1), changes or alterations have been required in, or incorporated into, the Project that mitigate or avoid the potentially significant impacts of the Project regarding expansive soils, as identified in the EIR. Therefore, impacts are considered less than significant. Mitigation measures will further reduce impacts to expansive soils.

4. Paleontological Resources

Threshold: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Finding: Less than significant with mitigation. (Draft EIR) Changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effects as identified in the EIR. (State CEQA Guidelines, section 15091(a)(1).)

Explanation: Two geologic units, Quaternary alluvium (Qa) and lower Monterey Formation (Tml), directly underlie the proposed project site (Figure 4.6-1 of the Draft EIR). A third geologic unit, Quaternary older alluvium (Qoa), is exposed at the surface less than 100 feet from the proposed project site, making it highly likely that this unit will be encountered at shallow depths within the proposed project site. Given their fossil-producing history, Quaternary older alluvium and the lower Monterey Formation are assigned a high paleontological sensitivity**.** Quaternary alluvium is generally considered too young to preserve scientifically significant paleontological resources, but geologic cross-sections and its proximity to highly sensitive

geologic units suggests that Qa may preserve such resources at depths as shallow as five feet. Therefore, Qa is assigned a low paleontological sensitivity at less than five feet of depth, but a high paleontological sensitivity deeper than five feet. The Thousand Oaks General Plan Conservation Element includes Policy CO-37 that address the protection and conservation of paleontological resources and Mitigation Measure GEO-3 requires full time palaeontologic resources monitoring and reporting by a Qualified Paleontologist during ground disturbance activities within highly sensitive geologic units. Therefore, impacts to paleontological resources would be less than significant with mitigation as well as adherence to Policy C)-37. Implementation of Mitigation Measure GEO-3 would reduce potential impacts to paleontological resources to a less than significant level.

MM GEO-3 ***Paleontological Resources Monitoring and Mitigation:***

1. **Qualified Paleontologist.** The project applicant shall retain a Qualified Paleontologist to direct all mitigation measures related to paleontological resources. A qualified professional paleontologist is defined by the Society of Vertebrate Paleontology (SVP) standards (SVP 2010) as an individual preferably with an M.S. or Ph.D. in paleontology or geology who is experienced with paleontological procedures and techniques, who is knowledgeable in the geology of California, and who has worked as a paleontological mitigation project supervisor for a least two years (SVP 2010).
2. **Paleontological Worker Environmental Awareness Program**. Prior to the start of construction, the Qualified Paleontologist or their designee shall conduct a paleontological Worker Environmental Awareness Program (WEAP) training for construction personnel regarding the appearance of fossils and the procedures for notifying paleontological staff should fossils be discovered by construction staff.
3. **Paleontological Monitoring**. Full-time paleontological monitoring shall be conducted during ground disturbing construction activities (i.e., grading, trenching, foundation work) within native (i.e., previously undisturbed) sediments of any depth in the lower Monterey Formation and depths greater than five feet in Quaternary alluvium. Ground disturbing activities that only impact artificial fill (i.e., previously disturbed) sediments do not require paleontological monitoring. Paleontological monitoring shall be conducted by a qualified paleontological monitor, who is defined as an individual who has experience with collection and salvage of paleontological resources and meets the minimum standards of the SVP (2010) for a Paleontological Resources Monitor. The duration and timing of the monitoring will be determined by the Qualified Paleontologist based on the observation of the geologic setting from initial ground disturbance, and subject to the review and approval by the City of Thousand Oaks. If the Qualified Paleontologist determines that full-time monitoring is no longer warranted, based on the specific geologic conditions once the full depth of excavations has been reached, they may recommend that monitoring be reduced to periodic spot-checking or ceased entirely. Monitoring shall be reinstated if any new ground disturbances are required, and reduction or suspension shall be reconsidered by the Qualified Paleontologist at that time. In the event of a fossil discovery by the

paleontological monitor or construction personnel, all work in the immediate vicinity of the find shall cease. A Qualified Paleontologist shall evaluate the find before restarting construction activity in the area. If it is determined that the fossil(s) is (are) scientifically significant, the Qualified Paleontologist shall complete the following conditions to mitigate impacts to significant fossil resources:

a. **Salvage of Fossils**. If fossils are discovered, the paleontological monitor shall have the authority to halt or temporarily divert construction equipment within 50 feet of the find until the monitor and/or lead paleontologist evaluate the discovery and determine if the fossil may be considered significant. Typically, fossils can be safely salvaged quickly by a single paleontologist and not disrupt construction activity. In some cases, larger fossils (such as complete skeletons or large mammal fossils) require more extensive excavation and longer salvage periods. Bulk matrix sampling may be necessary to recover small invertebrates or microvertebrates from within paleontologically sensitive deposits

b. **Preparation and Curation of Recovered Fossils**. Once salvaged, significant fossils shall be identified to the lowest possible taxonomic level, prepared to a curation-ready condition, and curated in a scientific institution with a permanent paleontological collection, along with all pertinent field notes, photos, data, and maps. Fossils of undetermined significance at the time of collection may also warrant curation at the discretion of the Qualified Paleontologist.

4. **Final Paleontological Mitigation Report**. Upon completion of ground disturbing activity (and curation of fossils if necessary) the Qualified Paleontologist shall prepare a final report describing the results of the paleontological monitoring efforts associated with the project. The report shall include a summary of the field and laboratory methods, an overview of the project geology and paleontology, a list of taxa recovered (if any), an analysis of fossils recovered (if any) and their scientific significance, and recommendations. The report shall be submitted to the City of Thousand Oaks. If the monitoring efforts produced fossils, then a copy of the report shall also be submitted to the designated museum repository

The City Council adopts Mitigation Measure GEO-3 a and finds it is feasible, and that it will further reduce impacts related to paleontological resources. Accordingly, the City Council finds that, pursuant to Public Resources Code section 21081(a)(1) and State CEQA Guidelines section 15091(a)(1), changes or alterations have been required in, or incorporated into, the Project that mitigate or avoid the potentially significant impacts of the Project regarding paleontological resources, as identified in the EIR. Therefore, impacts are considered less than significant. Mitigation measures will further reduce impacts related paleontological resources.

D. HAZARDS AND HAZARDOUS WASTE

1. Hazardous Material Sites

Threshold: 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?

Finding: Less than significant with mitigation. (Draft EIR) Changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effects as identified in the EIR. (State CEQA Guidelines, section 15091(a)(1).)

Explanation: Although there are no Cortese sites identified at the project site, there are contaminated soils onsite, as detailed in the 2018 Phase I Environmental Site Assessment (ESA) prepared by Partner Engineering and Science, Inc. , a subsequent 2019 Phase I ESA prepared by Partner (Partner 2019), a 2021 Phase II Subsurface Investigation by Partner , a 2021 Hazardous Materials Report prepared by Stantec Consulting Services, Inc., and a 2022 additional Soil Gas Investigation Report by Partner for the project site 2018 and 2019 Phase I ESAs, 2021 Phase II ESA, and 2022. Former uses of the vacant commercial building at 325 Hampshire Road included an automotive center with a known UST and hydraulic lifts and a clarifier which still remain onsite, and a dry-cleaning business which operated at the southern end of the property. Investigations of the area around the former automotive center by Stechmann Geoscience in 2007 (included in Appendix F of the Draft EIR) and by Partner in 2019 did not uncover evidence of a subsurface release of petroleum hydrocarbons or other contaminants in the vicinity of the former automotive shop, including around the clarifier and hydraulic lifts, and uncovered evidence that the UST was removed. However, only a limited number of soil samples were taken in these investigations, and it is possible that subsurface contaminants exist in the area of the former automotive shop.

The 2021 and 2022 investigations by Partner uncovered evidence of a subsurface release of chlorinated VOCs commonly associated with dry cleaning in the vicinity of the former dry cleaners, including elevated levels of PCE, benzene, ethylbenzene, and vinyl chloride in soil vapor above residential and commercial/industrial screening levels. As only a few samples were taken in the area, the nature and extent of any contamination plume resulting from the former dry cleaners is unknown. In addition, although borings were advanced as deep as 30 feet, the investigation did not encounter groundwater, although groundwater is expected to exist between 12 and 40 feet below the project site; therefore, the extent of potential impacts to groundwater from residual solvents from the dry cleaners is unknown. The levels of PCE and related compounds detected indicate that impacted soil vapor is present at the project site, and such constituents present a risk of vapor intrusion into structures built above the impacted area. In addition, the locations where elevated levels of VOCs were detected are as close as 100 feet from the off-site preschool. The 2021 and 2022 investigations by Partner conclude that a potential vapor intrusion concern exists for occupants of seven future buildings on the project site and that

vapor mitigation would be required for those buildings.

In addition to the suspected releases at the project site, the adjacent Shell station at 395 Hampshire Road was formerly the site of a LUST cleanup (Partner 2021, GeoTracker Case #02004). Two 10,000-gallon USTS were removed, and remediation activities continued until the case was closed in 2013. At the time of closure, elevated levels of common petroleum chemicals and MTBE were detected at groundwater monitoring wells for the cleanup effort that were installed at 391 Hampshire Road, which is part of the project site. At the time, the LARWQCB approved the closure of the case and the destruction of the groundwater monitoring wells, as the remaining levels of contaminants in the soil did not present a threat due to the lack of nearby sensitive uses, such as residential buildings. However, the proposed project design plans include residential and commercial uses situated directly over former groundwater monitoring wells that continued to display detectable levels of MTBE, including over former groundwater monitoring wells MW-5 and MW-8 (GeoTracker 2022a). MTBE was detected at a concentration of 57.7 µg/L and gasoline-range organics (GRO) were detected at a concentration of 191 µg/L when MW-8 was last sampled in March 2013. The Maximum Contaminant Level (MCL) for MTBE in drinking water is 13 µg/L in California. However, although the project would not source drinking water from the groundwater beneath the project site.

Groundwater at the project site is known to flow to the northwest (Partner 2018, 2019, and 2021), and as the closed release case was located at the southeastern corner of the project location, any remaining constituents would likely be contained in a groundwater plume extending onto the project site. The current extent of possible MTBE or GRO contamination on the project site from the closed case is unknown, as groundwater monitoring activities ended when the case was closed by the LARWQCB. However, construction of residential units in the area of the cleanup site and over soils located above and downgradient from the known former release area may expose residents and workers to potentially hazardous levels of these contaminants.

Construction of the proposed project would involve grading, trenching, and other activities which would result in the disturbance, relocation, and possible removal of contaminated soils. If contaminated soils are disturbed during construction activities, they could expose workers and area residents to hazards from contaminated dust, soils, and vapors. Such soils would need to be handled and disposed of as hazardous waste. In addition, if potentially contaminated soils are not removed during grading and construction, or are relocated elsewhere on the project site, they may present a hazard to future residents of the project site through vapor intrusion, contact with contaminated soil, or other pathways. This would result in a potential impact associated with a potential significant hazard to the public or the

environment on the health of the public and the environment and mitigation is required.

Implementation of Mitigation Measure HAZ-1 would ensure that the proper regulatory agencies are able to determine that the adjacent closed release case is not a hazard to new residential uses which were not present before. Mitigation Measures HAZ-1 through HAZ-4 would ensure coordination with the proper regulatory agencies and proper handling and/or disposal of contaminated soils during grading or other construction activities. Mitigation Measure HAZ-5 would reduce the potential for ongoing operational impacts related to contamination on the project site, including minimizing the risk of vapor intrusion into areas constructed above potential VOC plumes. Implementation of these measures would ensure that all appropriate regulatory oversight and approvals are obtained throughout project construction and operation and would reduce impacts related to potentially contaminated soils at the project site to less than significant.

MM HAZ-1 *Regulatory Agency Notification and Approval: Prior to the issuance of any demolition or grading permits, the project applicant shall contact the VCEHD to discuss the proposed redevelopment project, the proposed change to residential land use, the known hazardous material soil, soil vapor, and groundwater impacts onsite, and the adjacent closed release case at 395 Hampshire Road (Shell Station – Case #02004). The project applicant shall provide VCEHD with the proposed site use plans regarding the conversion of commercial land use to residential land use and discuss the onsite presence of groundwater impacted by VOCs at the proposed residential development. The project applicant shall provide the City Planning Department with copies of all communications to and from VCEHD.*

VCEHD may require the project applicant or the adjacent property owner to conduct additional investigation/studies, including, but not limited to, soil vapor, soil, and/or groundwater investigations, which could help delineate the extent of contaminated soil, soil vapor, and groundwater and allow for the proposed project to be designed in a manner to avoid or minimize impacts to proposed construction and operation of the residential development.

MM HAZ-2 *Regulatory Agency Voluntary Oversight Agreement: Prior to issuance of a grading permit, the applicant shall enter into a Voluntary Oversight Agreement with VCEHD to provide regulatory oversight of identified releases at the project site. VCEHD shall be utilized for agency oversight of assessment and remediation within the site through completion of building demolition, subsurface demolition, and construction the proposed project. Additionally, the project applicant shall notify the VCEHD project manager of the following:*

- Current development plan and any modifications to the development plan
- All written documents concerning hazardous material impacts to soil, soil vapor, and or groundwater, including, but not limited to, Phase I ESAs, Phase II ESAs, geophysical surveys, and other subsurface investigations.
- All former environmental documents completed for the project site, including this EIR
- Other documents, as requested by VCEHD

Upon notification of the information above, VCHED could require actions such as: development of subsurface investigation workplans; completion of soil vapor, soil, and/or groundwater investigations; installation of soil vapor or groundwater monitoring wells; soil excavation and offsite disposal; completion of human health risk assessments; and/or completion of remediation reports or case closure documents. The project applicant shall retain a qualified environmental consultant, California Professional Geologist (PG) or California Professional Engineer (PE), to prepare the documents required by VCEHD.

If groundwater wells or soil vapor monitoring probes are identified during demolition, subsurface demolition, or construction at the project site, they shall be abandoned per City of Thousand Oaks Public Works Department specifications. Abandonment activities will be documented in a letter report submitted to VCEHD within 60 days of the completion of abandonment activities.

The VCEHD closure and agency approval documents shall be submitted to the City Planning Department prior to issuance of grading permits.

It should also be noted that VCEHD may determine that RWQCB or DTSC may be best suited to perform the lead agency duties for assessment and/or remediation at the project site. Should the lead agency be transferred to LARWQCB or DTSC, this and other mitigation measures would still apply.

MM HAZ-3 *Site Manaement Plan for Impacted Soils, Soil Vapor and/or Ground Water:* The project applicant shall retain a qualified environmental consultant (PG or PE), to prepare a Soil and Groundwater Management Plan prior to construction. The Soil and Groundwater Management Plan, or equivalent document, shall address onsite handling and management of impacted soils, soil vapor, groundwater, or other impacted wastes, and reduce hazards to construction workers and offsite receptors during construction. The plan must establish remedial measures and/or soil management practices to ensure construction worker safety, the health of future workers and visitors, and the off-site migration of contaminants from the project site. These measures and practices may include, but are not limited to:

- Stockpile management including stormwater pollution prevention and the installation of BMPs
- Proper handling and disposal procedures of contaminated building materials, soil, and groundwater
- Monitoring and reporting
- A health and safety plan for contractors working at the project site that addresses the safety and health hazards of each phase of site construction activities with the requirements and procedures for employee protection

The health and safety plan shall also outline proper soil handling procedures and health and safety requirements to minimize worker and public exposure to hazardous materials during construction.

VCEHD shall review and approve the Soil and Groundwater Management Plan prior to demolition and grading (construction). The project applicant shall review and implement the Soil and Groundwater Management Plan prior to demolition and grading (construction).

Evidence of the review and approval by VCEHD shall be provided to the City Planning Department and City Engineers prior to the issuance of any demolition or grading permits.

MM HAZ-4 *Remediation:* If soils within the construction envelope at the development site contain chemicals at concentrations exceeding hazardous waste screening thresholds for contaminants in soil (California Code of Regulations [CCR] Title 22, Section 66261.24), the project applicant shall retain a qualified environmental consultant (PG or PE) to conduct additional analytical testing and recommend soil disposal recommendations, or consider other remedial engineering controls, as necessary.

The qualified environmental consultant shall utilize the development site analytical results for waste characterization purposes prior to offsite transportation or disposal of potentially impacted soils or other impacted wastes. The qualified environmental consultant shall provide disposal recommendations and arrange for proper disposal of the waste soils or other impacted wastes (as necessary), and/or provide recommendations for remedial engineering controls, if appropriate.

Remediation of impacted soils and/or implementation of remedial engineering controls may require additional delineation of impacts; additional analytical testing per landfill or recycling facility requirements; soil excavation; and offsite disposal or recycling.

VCEHD will review and approve the disposal recommendations prior to transportation of waste soils offsite, and review and approve remedial engineering controls, prior to construction. The project applicant shall

review the disposal and remedial engineering control recommendations prior to the issuance of any demolition permits. The project applicant shall implement the disposal recommendations and implement the remedial engineering controls during demolition/construction.

Evidence of the review and approval by VCEHD shall be provided to the City Planning Department and City Engineering Department prior to the issuance of any demolition or grading permits.

MM HAZ-5 *Vapor Mitigation System:* VCEHD may require the installation of a sub-slab vapor barrier system at the proposed project. The project applicant shall retain a qualified environmental consultant PG or PE or other qualified person to prepare a sub-slab vapor barrier system design for the proposed project. The plan may include, but is not limited to:

- Design specifications
- Material specifications
- Installation requirements
- Monitoring requirements

The project applicant shall incorporate a sub-slab vapor barrier system during construction, the implementation of which would reduce the potential for soil gas VOCs from migrating to indoor air within the residential building. VCEHD will review and approve the sub-slab vapor barrier system prior to construction.

The City Council adopts Mitigation Measures HAZ-1 through HAZ- 5, and finds they are and that they will further reduce impacts related to hazardous materials. Accordingly, the City Council finds that, pursuant to Public Resources Code section 21081(a)(1) and State CEQA Guidelines section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project that mitigate or avoid the potentially significant impacts of the proposed project regarding hazardous materials, as identified in the EIR. Therefore, impacts are considered less than significant. Mitigation measures will further reduce impacts related hazardous materials.

E. NOISE

1. Groundborne Vibration or Groundborne Vibration Levels

Threshold: Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Finding: Less than significant with mitigation (Construction); less than significant (Operation). (Draft EIR). Changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the

significant environmental effects as identified in the EIR. (State CEQA Guidelines, section 15091(a)(1).)

Explanation: Construction: The predicted vibration levels generated by construction equipment and potential associated impacts are provided in terms of in/sec PPV at the nearest structure. The greatest vibration levels would be generated by vibratory pile driving, which would generate vibration levels equivalent to the sonic pile driving vibration levels from the Federal Transit Administration (FTA) Transit Noise and Vibration Impact Assessment Manual because, as stated in the manual, "a sonic pile driver operates by continuously shaking the pile at a fixed frequency, literally vibrating it into the ground" (FTA 2018). The Manual also states that a "sonic/vibratory pile driver" generates substantially lower peak vibration levels than impact pile driving. The project vibration levels from this construction activity would be the typical levels for sonic pile driving, as construction contractors would be aware of neighboring buildings and there are no unusual site conditions or unusual proposed activities that would affect pile installation. Vibratory pile driving activity is proposed for the subterranean parking structures for the two mixed-use buildings on the eastern half of the project site.

Assuming typical operation of the vibratory pile driving equipment during building construction, such equipment would generate vibration levels of 0.170 in/sec peak particle velocity (PPV) at 25 feet. The off-site structures nearest to the proposed vibratory pile driving activity are the medical office building approximately 10 feet north of the project boundary and approximately 27 feet north of the nearest proposed subterranean parking structure, and the Shell Gas station, approximately 4 feet south of the project boundary and over 30 feet south of the nearest proposed subterranean parking structure. Vibration levels at the medical office building would be 0.151 in/sec PPV, below the applicable structural damage criteria for modern industrial/commercial buildings of 0.5 in/sec PPV, and therefore no vibration damage impact would occur. At the Shell Gas station to the south, vibration levels would be 1.391 in/sec PPV, above the applicable structural damage criteria for modern industrial/commercial buildings of 0.5 in/sec PPV, and therefore vibration impacts to structures would be potentially significant.

Regarding human annoyance, vibration levels from vibratory pile driving and large bulldozers at the medical office building would be above the levels that would be strongly perceptible of 0.1 in/sec PPV. In addition, vibration levels at the Little Dreamers Early Childhood preschool and the Windsor Terrace of Westlake Village convalescent home would be strongly perceptible when large bulldozers operate close to the construction boundary and vibration annoyance could occur. Therefore, construction vibration impacts are potentially significant. Vibration levels from vibratory pile driving would not exceed levels that would be strongly perceptible (i.e., 0.1 PPV, in/sec) at other vibration-sensitive receivers due

to the greater distance from the proposed construction activities. With implementation of setback distances, prior notice, and limiting the hours of operation of vibratory pile drivers and heavy construction equipment, such as bulldozers, as described Mitigation Measure NOI-2, potential structural damage and annoyance due to construction would be reduced, to less than significant with mitigation.

Operation: The proposed project does not include any substantial vibration sources associated with operation. Therefore, operational vibration impacts would be less than significant.

MM NOI-2 *Construction Equipment Vibration Restrictions:*

- Large bulldozers or similar equipment shall not operate within eight feet of the Shell Gas Station, smaller equipment shall be substituted within this distance.
- As the medical office building could potentially experience temporary construction-related and intermittently "strongly perceptible" vibration from vibratory/sonic pile driving activity occurring within 36 feet of the building, the developer shall give prior notice to that facility of any such activity within that distance, the developer shall provide evidence of notification to the City Planning Department prior to initiation of pile driving activities.
- Vibratory pile driving activity within 36 feet of the medical office building shall be scheduled during times outside of its hours of operation. Large bulldozers or similar equipment shall not operate within 24 feet of the Little Dreamers Early Childhood Preschool building, the Windsor Terrace of Westlake Village convalescent home, or the medical office building, with smaller equipment substituted within this distance.

The City Council adopts Mitigation Measure NOI-2 and finds that it is feasible, and that it will further reduce impacts related to construction vibration. Accordingly, the City Council finds that, pursuant to Public Resources Code section 21081(a)(1) and State CEQA Guidelines section 15091(a)(1), changes or alterations have been required in, or incorporated into, the Project that mitigate or avoid the potentially significant impacts of the Project regarding construction vibration, as identified in the EIR. Therefore, impacts are considered less than significant. Mitigation measures will further reduce impacts related to construction vibration.

SECTION IV.
IMPACTS THAN CANNOT BE FULLY MITIGATED TO A LESS THAN SIGNIFICANT LEVEL

The City Council hereby finds that, despite the incorporation of Mitigation Measures identified in the EIR and in these Findings, the following environmental impacts cannot be fully mitigated to a less than significant level and a Statement of Overriding Considerations is therefore included herein:

A. NOISE

1. Noise Standards

Threshold: Would the project result in the 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?

Finding: Significant and unavoidable (Construction); less than significant (Operation). (Draft EIR)
Changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effects as identified in the EIR. (State CEQA Guidelines, section 15091(a)(1).) However, impacts would still remain significant and unavoidable. Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measure or project alternatives identified in the EIR. (State CEQA Guidelines, section 15091(a)(3).)

Explanation: Construction: The highest construction noise levels would be generated by vibratory pile driving during the building construction phase. The average noise levels from construction equipment at the closest sensitive receiver location, which is the Little Dreamers Early Childhood preschool, as well as other nearby sensitive receivers, are shown in Table 4.10 4 in the EIR. These noise levels are based on the previously described RCNM with an individual piece of construction equipment operating at the edge of construction activity.

Based on the noise levels in Table 4.10 4 in the EIR, when concrete saws operate near the project boundary construction activity noise levels would reach 93.5 decibels (dB) L_{eq}, which would occur at the Little Dreamers Early Childhood preschool. The building would be expected to have an exterior-to-interior noise reduction of 12 dB with windows open and 24 dB with windows closed, assuming typical warm climate construction (U.S. Environmental Protection Agency 1978). Therefore, interior noise levels at the nearest noise-sensitive receiver would reach up to 81.5 dB L_{eq} with

windows open and 69.5 dB L_{eq} with windows closed. In addition, construction noise levels would exceed the 10 dB increase threshold at the other nearby sensitive receivers analyzed in Table 4.10 4 in the EIR.

To analyze sensitive receivers further from construction than those analyzed in Table 4.10 4 in the EIR, the loudest piece of construction equipment (vibratory pile driver) was analyzed. Vibratory pile driver noise levels at these receivers are shown in Table 4.10 4 in the EIR; as shown, construction noise levels would not exceed the 10 dB increase threshold at these receivers. As other construction equipment is quieter than the vibratory pile driver, all construction activities would not exceed the 10 dB increase threshold at these receivers.

Table 4.10 4 in the EIR shows, project construction equipment during all construction phases would increase noise levels at the nearest sensitive receivers by 10 dB or more, which humans perceive as a doubling of loudness. With mitigation, construction noise impacts would be reduced, however they would remain significant and unavoidable.

Implementation of Mitigation Measure NOI-1 would reduce construction noise levels by up to 11 dB through use of the temporary construction noise barrier. However, a temporary construction noise barrier is not proposed for the Early Childhood facility and the residences west of the project site on Foothill Drive that are elevated approximately 30 feet to 40 feet above the project site because a construction noise barrier would not be tall enough to block line of sight from the project construction equipment to these receivers. Even with the barrier, when pile driving occurs project construction-related noise increases in ambient noise levels would still be greater than 10 dB at the Westlake Villas multifamily residences to the south during the building construction phase and at the Windsor Terrace of Westlake Village convalescent home during the demolition, site preparation, grading, building construction, and paving phases of construction, as shown on Table 4.10-6 of the EIR. In addition, the magnitude of the project's temporary construction noise levels relative to the ambient levels is such that even a maximally-effective noise barrier would not feasibly reduce project construction-related noise increases to below the 10 dB increase threshold during other, non-pile driving activities. Therefore, construction noise impacts after mitigation would be significant and unavoidable at these receivers.

Operation: Operational Heating Ventilation and Air Condition (HVAC) noise increases over ambient noise levels would range from less than 1 decibels using the A-weighted sound pressure level (dBA) Community Noise Equivalent Level (CNEL) to 2 dBA CNEL at noise sensitive uses adjacent to the project site (Appendix G). These noise level increases would be below the City's threshold of a 3 dB or more increase for areas that experience a noise level of 55 dBA CNEL to 60 dBA CNEL and the City's

threshold of a 1.5 dBA or more increase for areas that experience a noise level of 65 dBA CNEL to 70 dBA CNEL with the project. In addition, a noise level increase of less than 3 dBA would not be perceptible to the human ear in an outdoor environment. Therefore, a substantial noise increase would not occur, and HVAC noise impacts would be less than significant.

The proposed project would generate new vehicle trips that would increase noise levels on nearby roadways.

Due to the relatively small increase in overall ADT volumes from project-generated traffic, the noise level increases would range between less than 1 dBA CNEL to be 2 dBA (CNEL), when comparing existing to existing plus and cumulative to cumulative plus project traffic scenarios. These noise level increases would be below the City's noise thresholds of a 3 dBA increase to 55 dBA – 60 dBA CNEL, a 1.5 dBA increase to 60 dBA – 70 dBA CNEL, or a 1 dBA increase to more than 70 dB CNEL. Furthermore, the project's traffic noise increase would not exceed 3 dBA or more, and impacts would be less than significant.

To reduce potential impacts, NOI-1 is to be implemented to reduce construction related noise impacts to sensitive receivers.

MM NOI-1 ***Construction Noise Reduction Measures:***

- Temporary construction barriers along the southern edge of the project site facing the Westlake Villas multifamily residences at 575 Hampshire Road and along the northwestern edge of the project facing the Windsor Terrace of Westlake Village convalescent home at 250 Fairview Road shall be in place during the Project construction (including demolition, grading, and site preparation), when heavy construction equipment is used, excluding areas where gaps in the barrier are necessary for access. The barrier shall be least 12 feet in height above the project site existing grade level and constructed of a material with a Sound Transmission Class (STC) rating of at least STC-31 (such as acoustic panels or sound barrier products) or a transmission loss of at least 21 dB at 500 hertz (such as 3/4-inch plywood), which would provide an insertion loss (net barrier reduction) of up to 11 dB at the convalescent home and multifamily residences.
- Power construction equipment (including combustion engines), fixed or mobile, shall be equipped with state-of-the-art noise shielding and muffling devices (consistent with manufacturers' standards). All equipment shall be properly maintained to assure that no additional noise, due to worn or improperly maintained parts, would be generated.
- With the exception of excavation equipment, grading and construction contractors shall use rubber-tired equipment rather than metal-tracked equipment.

- The use of on-site electrical power shall be preferred to the use of stationary construction equipment such as generators or air compressors. If stationary construction equipment would be used on site for more than one hour in a day, such equipment shall be placed as far as possible from off-site sensitive receivers. Stationary construction equipment shall also be shielded by either noise blankets or by temporary noise barriers at least three feet taller and six feet wider than the noise source.
- Construction staging and delivery areas shall be located towards the center of the property and a minimum of 100 feet from the project lines.
- The project applicant shall post a notice at the construction site. The notice shall contain information on the type of project, anticipated duration of construction activity, and provide a phone number where people can register questions or complaints. The notice shall be posted no later than 72 hours prior to the planned activity.
- Based on areas of construction noise impacts, the Little Dreamers Early Childhood preschool, the Windsor Terrace of Westlake Village convalescent home, the single-family residences and multifamily communities to the west (along Foothill Drive, south of Fairview Road), and the Westlake Villas apartment community to the south shall be informed via mail and posting at the site of the anticipated start date, duration, noise impact, and other pertinent information prior to the construction of the project. Notification shall also include a phone number where people can register questions or complaints. Notification shall also be delivered no later than 72 hours prior to the planned activity.
- An on-site construction manager shall be responsible for responding to local complaints about construction noise. All notices that are sent to sensitive receivers and all signs posted at the construction site shall list the telephone number for the on-site construction manager.
- Construction supervisors shall be informed of project-specific noise requirements, noise issues for sensitive land uses adjacent to and near the project construction site, and/or equipment operations to ensure compliance with the required regulations and best practices.

The City Council adopts Mitigation Measure **NOI-1**, and finds that it is feasible and that it will further reduce impacts related to construction noise. Accordingly, the City Council finds that, pursuant to Public Resources Code section 21081(a)(1) and State CEQA Guidelines section 15091(a)(1), changes or alterations have been required in, or incorporated into, the Project that mitigate or avoid the potentially significant impacts of the Project regarding construction noise, as identified in the EIR. alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effects as identified in the EIR. (State CEQA Guidelines, section 15091(a)(1).) However, impacts would still remain significant and unavoidable. Specific economic, legal,

social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measure or project alternatives identified in the EIR. (State CEQA Guidelines, section 15091(a)(3).)

SECTION V.
CUMULATIVE IMPACTS

Regarding the proposed project's potential to result in cumulative impacts, the City hereby finds as follows:

A. AESTHETICS/VISUAL RESOURCES

Although aesthetic impacts are generally site-specific, impacts that may affect scenic vistas or recognized visual resources can influence a broader area. As discussed above, the proposed project is anticipated to have less than significant impacts to views from surrounding public locations and from the major roadways. Nearby projects in the cumulative list for the next five years consist of a sports training facility, an auto dealership, and a limited number of single-family homes. The closest project is a cluster of three single-family residences at Willow Land and Skyline Drive, approximately 0.4-mile northwest of the project site. A storage facility is proposed for 2650 Willow Lane, 0.5-mile northwest of the project site. Other nearby proposed projects include multi-family residential, commercial, two mixed-use projects on Thousand Oaks Boulevard, and an assisted living facility. These projects range from 0.5 mile to 1.8 miles from the site. The other projects largely cohere with the general efforts to increase density and commercial uses in the area. Overall, the projects are similar to the proposed project in that they are a mix of commercial and residential uses. . All cumulative projects would be subject to the same requirements as the proposed project including the design guidelines and regulatory compliance presented herein. Development of the proposed project in conjunction with the cumulative projects would result in an increase in residential, commercial, and restaurant uses throughout the community. However, the proposed project would not contribute to a potential cumulative impact that would constitute a degradation of visual quality in the proposed project vicinity as it would remove aging, blighted buildings, replacing them with a modern, well-designed and landscaped development that includes public open spaces and improved neighborhood connectivity. All cumulative projects would be subject to the same requirements as the proposed project, such as City of Thousand Oaks lighting requirements and Title 24 and Freeway Design Guidelines. Where hillside development occurs, projects would be analyzed in a site-specific, separate environmental analysis for each *project* to determine impacts to visual quality and to mitigate if they arise. Nighttime illumination could be anticipated to incrementally increase with these developments. However, the cumulative projects are distributed throughout an urbanized area with a high degree of existing nighttime illumination and additional glow from these projects is anticipated in the Thousand Oaks General Plan. Furthermore, all cumulative projects would be subject to the same requirements as the proposed project where exterior lighting and glare effects are possible, and this would be analyzed in a site-specific, separate environmental analysis for each project to determine impacts to light and glare and to mitigate them if they arise. As such, the proposed project's cumulative impacts to aesthetics and visual resources would not be cumulatively considerable.

B. AIR QUALITY

Air pollution from the proposed project may combine with other cumulative projects (past,

present, and reasonably foreseeable future) to violate criteria pollutant standards if the existing background sources cause nonattainment conditions. Air districts manage attainment of the criteria pollutant standards by adopting rules, regulations, and attainment plans, which comprise a multifaceted programmatic approach to such attainment.

Air pollution is largely a cumulative impact, and the Ventura County Air Pollution Control District (VCAPCD) has provided guidance on cumulative impact analysis. According to the VCAPCD, the proposed project would have a considerable cumulative impact if it is inconsistent with the AQMP's growth forecast and jeopardizes the attainment status of the federal standards. The proposed project's development would consist of 420 dwelling units, adding approximately 1,294 new residents by the anticipated buildout year (2025). The proposed project would accommodate regional growth consistent with the AQMP's 2025 population forecast. As described in Impact AQ-2 of the EIR, the proposed project's daily emissions of construction-and operation of related pollutants would not exceed VCAPCD regional thresholds.

As discussed under Impact AQ-3 of the EIR, a HRA was prepared to determine the carcinogenic and noncarcinogenic risk during the proposed project's construction and found sensitive receptors to be within the State threshold for no significant risk under Proposition 65. Furthermore, the proposed project would not exceed the federal CO standard, resulting in a CO hot spot. The proposed project would comply with VCAPCD Rule 55 to minimize fugitive dust to reduce the risk of San Joaquin Valley Fever during the proposed project's construction activities. In addition, the proposed residential and commercial land use is not typical to generate substantial odors during the construction and operation activities. Therefore, the proposed project's contribution to cumulative air quality impacts would not be cumulatively considerable.

C. BIOLOGICAL RESOURCES

Proposed development includes a mix of commercial, restaurant and residential uses including 420 new residential units that will house residents and include amenities such as co-working spaces, fitness center, community lounges, leasing offices, and a dog park. The total impacts of this proposed project would require the demolition of existing structures to make way for these developments. Currently, proposed project activities are limited to this site alone, and all proposed development would occur within the proposed project site. Other development plans in the city exist, but, similar to the site, will develop on sites that have been historically developed for years, where structures are already present, as well as parking lots and ornamental vegetation. Because the site is already developed, impacts to sensitive biological resources from ground disturbing activities is limited.

Although mitigable, the proposed project could adversely impact sensitive species, such as bats and nesting birds, and would impact protected trees. Other related disturbances, such as noise, dust, and vibrations can alter landscapes that would normally support species in ornamental vegetation and nearby open areas. However, implementation of Mitigation Measures BIO-1 and BIO-2 would reduce these additional impacts to a less than significant level. In addition, individual development proposals are reviewed separately by the appropriate jurisdiction and undergo environmental review when it is determined that the

potential for significant impacts exist. If future proposed project activities or additional related activities in other locations were to occur and thereby result in potential impacts to sensitive habitats and biological resources, impacts to such resources would be addressed on a project-by-project basis. Therefore, impacts related to sensitive habitats and biological resources would not be cumulatively considerable.

D. CULTURAL AND TRIBAL RESOURCES

There are 55 planned and pending projects in the vicinity of the project site including a mix of commercial, office, retail, and residential developments. Buildout of these cumulative projects would result in an additional 890,500 square feet (sf) of commercial development, 106,400 sf of industrial development, a 68-room plus a 10,680-sf ballroom hotel expansion, 484 new multi-family residential units, and 92 new single-family residences in the city. Although impacts to historical resources are generally site-specific, cumulative impacts to historical resources may occur when the proposed project combined with nearby related projects substantially diminish the number of historical resources within the same or similar context or property type. Related projects in the vicinity of the project site may involve alterations or demolitions of historical buildings or resources. However, it was determined that existing buildings on the project site are not considered historical resources and no historical resources exist within a 0.25-mile radius of the project site. Therefore, the proposed project would not have the potential to directly or indirectly affect historical resources on the site or outside of the study area and would not have the potential to contribute to a cumulative impact to historical resources.

Cumulative development in the greater area of the city could potentially disturb known and currently unknown archaeological resources and human remains that could be present throughout the city. The nature and magnitude of such impacts is generally site specific and depends on the nature of the individual project site and project ground disturbing activities. As such, these impacts are generally assessed on a project-by-project basis. While there is the potential for significant cumulative impacts to archaeological resources and human remains, it is anticipated that potential impacts associated with the project and related projects would be subject to City policies and local and State regulations regarding the protection of such resources. With compliance with existing policies, regulations, and mitigation measures, cumulative development would be required to avoid or mitigate the loss of these resources. Project impacts to archaeological resources and human remains would be reduced to a level of less than significant with Mitigation Measures CUL-1 and CUL-2. Therefore, the project's contribution to cumulative impacts to archaeological resources and human remains would not be cumulatively considerable. Overall, the proposed project's impacts to cultural resources would not be cumulatively considerable.

E. ENERGY

The entirety of Ventura County constitutes the cumulative geographic scope for energy demand and consumption in relation to the proposed project. This geographic scope is appropriate because the smallest scale at which energy consumption information is readily available is the county level. Cumulative development would increase demand for energy resources across the county However, new iterations of the California Building Energy

Efficiency Standards and CALGreen would require increasingly more efficient appliances and building materials that reduce energy consumption in new development. As described under Impact E-1, the proposed project would be constructed in accordance with the California Building Energy Efficiency Standards and CALGreen. The proposed project's electricity and natural gas consumption would be 0.004 and 0.03 percent of the consumption in the Southern California Edison and Southern California Gas Company service area, respectively. Therefore, the proposed project would not have a cumulatively considerable contribution to a significant cumulative impact related to energy. Additionally, residents of the proposed project have been anticipated under Southern California Association of Government (SCAG) population, housing and growth projections for 2045 and would not represent new energy demands within the region. The proposed project would comply with regulatory requirements for building efficiency and incorporate features that encourage a reduction in the use of gasoline-fueled vehicles, the proposed project would not conflict with a State or local plan for renewable energy or energy efficiency. Therefore, the proposed project would not result in a cumulatively considerable contribution to a significant cumulative impact to energy.

F. GEOLOGY AND SOILS

Cumulative development in the city would gradually increase population and therefore gradually increase the number of people exposed to potential geological hazards, including effects associated with seismic events such as ground rupture, seismic shaking, liquefaction, and landslides. However, geologic hazards are site specific, and individual development would not create compounding impacts that would affect geologic conditions on other sites. Moreover, future development projects such as the proposed project, would be subject to CEQA review on a project-by-project basis and would be required to comply with applicable provisions of the Thousand Oaks General Plan, Thousand Oaks Municipal Code, California Building Code (CBC), as well as other appropriate laws and regulations. The City also requires that all new structures comply with seismic and geologic hazard safety standards, including design and construction standards that regulate land use in areas known to have or to potentially have significant seismic and/or other geologic hazards. Cumulative projects could increase the potential for impacts to buried paleontological resources through construction activities in the area. However, project-specific mitigation for cumulative development would limit this impact to less than significant, and implementation of Mitigation Measure GEO-3 as well as adherence to Conservation Element Policies, CO-37 and CO-38 would ensure the proposed project would not have a cumulatively considerable contribution to a significant cumulative impact related to paleontological resources. Other potential impacts from future development would be addressed on a project-by-project basis, and appropriate mitigation would be designed to mitigate impacts resulting from individual projects. Therefore, the proposed project's impacts to geology and soils would not be cumulatively considerable.

G. GREENHOUSE GAS (GHG) EMISSIONS

GHG impacts are assessed in a cumulative context since no single project can cause a discernible change to climate. Therefore, cumulative significance is based on the same thresholds as the proposed project. In the absence of an adopted quantitative threshold for

determining the potential significance of GHG emissions that would be applicable to the proposed project, in accordance with CEQA Guidelines Section 15064.4(b)(3), the determination of the significance of the proposed project's GHG emissions impact is based on a qualitative analysis considering the project's consistency with applicable statewide, regional, and local plans adopted for the purpose of reducing GHG emissions. The proposed project would comply with statewide, regional, or local plan for the reduction or mitigation of GHG emissions including solar readiness to code and electric vehicle (EV) parking space provision as well as energy conservation standards of Title 24 Building Energy Efficiency Standards (Part 6) and Green Building Standards (Part 11). The proposed project would also be designed to meet or exceed "green" building standards including energy efficiency to achieve equivalency to USGBC LEED Gold Certification. The proposed project would also be consistent with the Southern California Association of Governments (SCAG) 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which, through California Air Resource Board (CARB) Executive Order G-20-239, is verified by CARB in order to achieve per capita reduction goals by 2035, relative to 2005 levels, as established by CARB for the region. Additionally, the proposed project would be consistent with CARB's 2008 and 2017 update of the Climate Change Scoping Plan: A Framework for Change. Therefore, based on the CEQA Guidelines for determining the significance of GHG emissions, the currently available adopted plans for reducing GHG emissions applicable to the proposed project, and the absence of applicable adopted quantitative significance thresholds, the proposed project's impacts to greenhouse gas emissions would not be cumulatively considerable.

H. HAZARDS AND HAZARDOUS MATERIALS

Cumulative development in the city would gradually increase population and therefore gradually increase the number of people exposed to potential hazards and hazards materials. However, hazards are site specific unless hazardous materials are being transported beyond the project area, and individual development would not create compounding impacts that would affect hazardous conditions on other sites. Moreover, future development projects would be subject to CEQA review on a project-by-project basis and would be required to comply with applicable provisions of the Thousand Oaks General Plan, Thousand Oaks Municipal Code, as well as all of the other applicable laws and regulations, including remediation plans.

Cumulative projects would increase the potential for impacts related to encounters with hazardous materials by construction workers during construction activities and residences and employees exposed to hazardous materials. However, project-specific mitigation for cumulative development would limit this impact to less than significant, and implementation of Mitigation Measure HAZ-1 through Mitigation Measure HAZ-5 and adherence to all regulatory requirements would ensure the proposed project would not have a cumulatively considerable contribution to a significant cumulative impact related to hazardous materials. Other potential impacts from future development would be addressed on a project-by-project basis, and appropriate mitigation would be designed to mitigate impacts resulting from future proposed individual projects. Therefore, implementation of the project would have an incremental contribution to cumulative impacts associated with hazards and hazardous materials but would not be cumulatively considerable.

I. LAND USE AND PLANNING

The Thousand Oaks General Plan attempts to facilitate future growth complimentary to adjacent land uses. Projects that can divide communities, such as new freeways, have long been recognized as an adverse effect on neighborhoods. Therefore, the Thousand Oaks General Plan attempts to avoid such development in areas of established communities. The Thousand Oaks Ranch Specific Plan would not divide established communities and would have no cumulative contribution to impacts on dividing established communities. Individual projects envisioned in the Thousand Oaks General Plan would also be evaluated for consistency with the Ventura County General Plan policies that avoid or mitigate environmental effects at the time they are proposed and evaluated pursuant to CEQA. While the proposed project would conflict with some Thousand Oaks General Plan policies pertaining to noise, these impacts would be temporary since they would occur during construction and would cease when construction is completed. As such, after construction the proposed project would be consistent with established noise policies. Therefore, the proposed project's impacts to land use would not be cumulatively considerable.

J. NOISE

The closest project is a cluster of three single-family residences at Willow Land and Skyline Drive, approximately 0.4-mile northwest of the project site. A storage facility is proposed for 2650 Willow Lane, 0.5-mile northwest of the project site. Other proposed projects include multi-family residential, commercial, two mixed-use projects on Thousand Oaks Boulevard, and an assisted living facility. These proposed projects range from 0.5 mile to 1.8 miles from the site. Although some cumulative projects in the surrounding area may be under construction at the same time as the proposed project, these projects are not located in close enough proximity to the project site such that noise and vibration from construction activities would impact the same sensitive receivers and structures due to existing intervening structures that would block the line of sight, distance attenuation, and sensitivity to noise for the affected land use. The proposed project's construction noise would exceed applicable thresholds; with mitigation, noise would be reduced, but would remain significant after mitigation. Therefore, if other construction projects were to occur in the immediate area simultaneous to the proposed project, impacts would be cumulatively considerable. Vibration impacts would be less than significant with mitigation and would not be cumulatively considerable.

Some cumulative projects in the surrounding area would include similar operational noise sources as the proposed project (e.g., HVAC, parking activities). Similar to construction noise and vibration, operational noise and vibration from these sources is localized and rapidly attenuates within an urbanized setting due to the effects of intervening structures and topography that block the line of sight and other noise sources closer to receivers that obscure project-related noise. Project-generated traffic would generate an increase of up to approximately 2 dBA at adjacent roadways; however, this increase is not considered cumulatively substantial. Given the distance of the cumulative projects from the project site, these projects are not located in close enough proximity to the project site such that operational noise and vibration would impact the same sensitive receivers. Therefore, there would be no cumulatively considerable noise impacts related to operational noise and

vibration associated with the proposed project.

K. POPULATION AND HOUSING

The geographic scope for cumulative population and housing impacts is generally limited to the city of Thousand Oaks. This geographic scope is appropriate for population and housing because projections at this level are used to estimate the need for public services and other government facilities and programs within the city. Cumulative development includes development associated with buildout of the Thousand Oaks General Plan and 2020 Housing Element. The city has experienced relatively flat population growth over the last 11 years. However, the SCAG forecast anticipates that population will grow substantially over the 2020 and 2045 period. The city's population is expected to grow from 125,426 to approximately 144,700 people, a roughly 13.4 percent increase, and the number of households is expected to grow from the current 48,169 to approximately 54,195 households (11.2 percent). SCAG projects employment in the city to increase up to 32 percent or approximately up to 20,600 jobs, by 2045. This growth rate is slightly lower than that of Ventura County overall, where employment is expected to grow about 42 percent and quite a bit higher than Los Angeles County, where employment growth is expected to increase approximately 22 percent by 2045.

However, the proposed project would not directly induce substantial unplanned growth and would not contribute cumulatively to unplanned growth in the city as the growth is within the estimated growth by SCAG's forecast and the City's Housing Element. Therefore, the cumulative impacts to substantial unplanned growth would not be cumulative considerable. Similarly, the proposed project would involve the redevelopment of an existing, non-operational commercial use and would not contribute to the displacement of any existing residents or remove housing that would necessitate the construction of replacement housing elsewhere. Thus, the proposed project would not contribute to cumulative impacts relative to the displacement of housing and people. Overall, the proposed project's impacts to population and housing would not be cumulatively considerable.

L. PUBLIC SERVICES

The cumulative setting for the proposed project is the County of Ventura. Law enforcement, fire protection, and emergency services would be provided by the Ventura County Fire Department, Ventura County Sheriff's Department and Thousand Oaks Police Department, respectively. School and library services would be provided by local schools and libraries within the city. Other projects within Ventura County may require the construction of new or expansion of existing fire and police stations, schools and public facilities within each jurisdiction. The potential environmental impacts resulting from the construction of new or expanded public facilities within the county would have to be evaluated at each associated project level. While the proposed project would add approximately 1,121 new residents to the city, the resulting construction and operation of the proposed project would not add to the need for new or modified services and facilities in relation to other proposed projects in Ventura County. Therefore, implementation of the proposed project would have an incremental contribution to cumulative impacts associated with public services but would not be cumulatively considerable.

M. RECREATION

Cumulative growth near the site includes specific known development projects and ambient growth in the city of Thousand Oaks. As listed in Section 3, Environmental Setting, a total of 24 projects have been identified in the vicinity of the proposed project site. These projects have anticipated adding 912 dwelling units and 336 thousand square feet of commercial uses to the city. Given the future potential growth in the vicinity of the project site, this development of other residential and mixed-use projects within the city would have the potential to increase population and would create additional need for recreational opportunities within the area. However, much of this growth has been anticipated by the City and has been accounted for in the 2013 Thousand Oaks General Plan Land Use Element.

The proposed project would provide approximately 3.8 acres of new public and common shared open space including a dog park, walking paths, sitting gardens, fitness facilities with pool, and improved access to trailheads. Such features would enhance the park space and recreational opportunities in the greater Thousand Oaks community and would help to offset the demand for additional parks from the proposed project and other cumulative projects in the vicinity. In addition, there are currently 10 Conejo Recreation and Park District parks and recreational facilities located within a two-mile radius of the project site that would be able to serve the new residents from cumulative development in the community. Such parks include El Parque de la Paz, a 4.8-acre park, Beyer Park, a 4-acre park, Estella Park, a 1.9-acre park, and Russell Park, a 7-acre park.

As with the proposed project, other residential or mixed-use projects proposed in the area would be required to comply with the City of Thousand Oaks Municipal Code Section 9-3.1 and provide a certain amount of usable open space, which would help offset the demand for parks and recreational facilities generated by the related projects. As such, impacts to recreation would not be cumulatively considerable.

N. TRANSPORTATION AND TRAFFIC

The residential component of the proposed project is anticipated to have less than significant impacts based on an estimated generation of daily residential VMT per Capita within the project TAZ that is 29 percent below baseline conditions. The retail component of the proposed project would meet the requirements to screen out of further CEQA analysis, resulting in no commercial impacts related to transportation and traffic. Additionally, the proposed project would not substantially increase hazards due to a geometric design feature, as it would be constructed within a previously development site and would adhere to both the City of Thousand Oaks 2018 Road Design and Construction Standards and Standard Land Development Specifications document, as well as the Ventura County Fire Protection District, Fire Prevention Division Standard Planning Conditions. The proposed project is surrounded by existing commercial, institutional, and residential uses and would not introduce incompatible uses, including vehicles or equipment, to the project site or the surrounding area. Since the proposed project would not alter or affect the existing street and intersection networks in the vicinity, nor require closure of existing roadways in its vicinity during construction, the project would not result

in inadequate emergency access.

Nearby projects proposed by the City in the next five years consist of a sports training facility, an auto dealership, and a limited number of single-family homes. The closest project is a cluster of three single-family residences at Willow Lane and Skyline Drive, approximately 0.4-mile northwest of the project site. A storage facility is proposed for 2650 Willow Lane, 0.5-mile northwest of the project site. Other proposed projects include multi-family residential, commercial, two mixed-use projects on Thousand Oaks Boulevard, and an assisted living facility. These range from 0.5 mile to 1.8 miles from the project site. The proposed project would largely cohere with the general efforts to increase residential density and commercial uses in the area. Overall, the nearby cumulative projects are similar to the proposed project in that they are a mix of commercial and residential uses. Additionally, the cumulative projects fall outside of the project TAZ identified for the proposed project. All cumulative projects would be subject to the same requirements as the proposed project, including the design guidelines and regulatory compliance presented herein as well as the Ventura County Fire Protection District, Fire Prevention Division Standard Planning Conditions. Therefore, it is anticipated that the cumulative projects would generate a similar average daily residential VMT per Capita as the proposed project, would not substantially increase hazards due to a geometric design feature or incompatible use, and would not result in inadequate emergency access. Overall, cumulative impacts related to transportation and traffic would be less than cumulatively considerable.

O. UTILTIES AND SERVICE SYSTEMS

The proposed project would require alterations to dry utility lines and underground services which would include, electricity and gas. Calleguas Municipal Water District possesses sufficient water supplies to serve the project site and reasonably foreseeable future development during normal, single-dry, and multiple-dry years. Project-generated as well as future project needs for wastewater would be adequately served by available capacity at the Hill Canyon Treatment Plant. Finally, the proposed project would not generate solid waste in excess of state or local standards, impact the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals, and would comply with federal, state, and local solid waste management and reduction statutes. Future development projects would be required to meet existing infrastructure capacities or to provide for infrastructure improvements, as necessary. Therefore, the proposed project's impacts to utilities and service systems would not be cumulatively considerable.

P. WILDFIRE

To analyze cumulative wildfire impacts, the EIR considered anticipated development in the city, and a potential population increase of approximately 15,200 in the city by 2040. This cumulative wildfire impact analysis particularly considered development on the southwest side of the city which may expose some site to potential risk to wildfire. However, since the proposed project as well as all future projects would be required to adhere to city, State, and federal regulations designed to reduce and/or avoid impacts related to wildfire, implementation of the proposed project in itself would not result in a significant cumulative impact related to wildfire. With compliance with these regulations,

cumulative impacts related to wildfire would be less than significant. Potential impacts of the proposed project with regard to wildfire, when combined with the impacts of past, present, and reasonably foreseeable projects in the city, could contribute to a cumulatively significant impact due to the increased risk of wildfire and impacts to resources and human life as a result of wildfire. In addition, each development application received by the city is required to undergo environmental review pursuant to CEQA. If there were any potential for significant impacts with regard to wildfire and related risks, an investigation would be required to determine the nature and extent of the resources and identify the appropriate mitigation measures. Therefore, the proposed project's impacts to wildfire would not be cumulatively considerable.

SECTION VI.
FINDINGS REGARDING SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

Section 15126.2(d) of the CEQA Guidelines requires a discussion of any significant irreversible environmental changes that would be caused by the proposed project. Specifically, Section 15126.2(d) states:

> Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

Generally, a project would result in significant irreversible environmental changes if any of the following would occur:

- The primary and secondary impacts would generally commit future generations to similar uses;
- The project would involve a large commitment of nonrenewable resources;
- The project involves uses in which irreversible damage could result from any potential environmental accidents associated with the project; or
- The project involves the wasteful use of resources.

The proposed project involves infill development on a currently developed lot in the City of Thousand Oaks. Construction and operation of the proposed project would involve an irreversible commitment of construction materials and non-renewable energy resources. The proposed project would involve the use of building materials and energy, some of which are non-renewable resources, to construct the overall building floor area of 841,153 gross square feet. However, consumption of these resources would occur with any development in the Ventura County region and are not unique to the proposed project.

The proposed project would also irreversibly increase local demand for non-renewable energy resources such as petroleum products and natural gas. However, efficient building design would offset this demand to some degree by reducing energy demands of the proposed project. The proposed project would be required to meet the California Building Energy Efficiency Standards and California Green Building Standards (CALGreen; California Code of Regulations Title 24, Parts 6 and 11) to reduce environmental impacts, decrease energy costs, and create healthier living. The California Energy Code provides energy conservation standards for all new and renovated commercial and residential buildings constructed in California, and the Green Building Standards Code requires solar access, natural ventilation, and stormwater capture. Additionally, where feasible, passive sustainable design strategies to minimize overall energy consumption needed to heat and cool the building would be utilized under the proposed project. These strategies include daylighting, natural sources of heating and cooling, operable windows, shading on south facing windows, ceiling fans, well designed building envelopes with high-U values (insulation rating). The project applicant would also be required to coordinate with SCE to identify opportunities to optimize energy infrastructure while minimizing cost and avoid barriers that may prevent future entry or expansion of energy efficient systems. Consequently, the proposed project would not use unusual amounts of energy or construction materials and impacts related to consumption of non-renewable and slowly renewable resources would be less than significant. Again, consumption of these resources would occur with any development in the region and is not unique to the proposed project.

Additional vehicle trips associated with the proposed project would incrementally increase local traffic and regional air pollutant and GHG emissions. However, development and operation of the proposed project would not generate air quality or GHG emissions that would result in a significant impact. Additionally, long-term impacts associated with the proposed project would be less than significant based on city and regional thresholds for roadway segment level or services and vehicle miles traveled. The proposed project would also require a commitment of law enforcement, fire protection, water supply, wastewater treatment, and solid waste disposal services. However, as discussed in the Draft EIR, impacts to these service systems would not be significant.

In regard to potential irreversible damage to cultural resources, the Draft EIR concluded that there are no previously recorded prehistoric or historic-period cultural resources identified within the site. However, development of the proposed project has the potential to unearth or adversely impacts previously unidentified archaeological resources or unknown human remains that could be considered a potentially significant impact. The proposed project would implement Mitigation Measures CR-1 and CR-2 that would reduce these impacts to a less than significant level (Draft EIR, Section. 6-2).

SECTION VII.
GROWTH-INDUCING IMPACTS

Section 15126.2(e) of the CEQA Guidelines requires consideration of the growth inducing impacts of a proposed project. Growth inducing impacts are characteristics of a project that could "foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment." According to the CEQA Guidelines, such projects include those that would remove obstacles to population growth (e.g., a major expansion of a

wastewater treatment plant). In addition, as set forth in the CEQA Guidelines, increases in the population may impact existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. The CEQA Guidelines state that it must not be assumed that growth in an area is necessarily beneficial, detrimental, or of little significance to the environment. Therefore, the proposed project's growth inducing effect is considered a significant environmental impact if project-induced growth could result in significant physical effects in one or more environmental issue areas.

Population Growth

The proposed project would generate population growth due to its addition of new residential uses in the city. Based on the average 2.67 people per household in the city, the proposed addition of between 420 housing units would generate an increase of approximately 1,121 residents. The office and commercial development under the proposed project may also increase the population if new employees relocated to the city. Based on employee generation assumptions in the Draft EIR (Section 4.11, Population and Housing), the proposed project would generate approximately 36 new employees in the retail/service industry. However, retail jobs in themselves typically do not induce relocation since these are mostly filled by local labor. Therefore, population growth related to jobs from the commercial uses on the site would be minimal and within current SCAG projections. If all projected employees and their families were to relocate to the city, there could be a potential population growth of 96 new persons based on the California Department of Finance (DOF) average household estimate of 2.67 persons for the city. As determined by the California DOF and SCAG, the current population for the city is 125,426 persons and the population growth forecast is 144,700 persons in 2045. Therefore, a population growth of 1,121 residents could be accommodated within the city's growth projections (Draft EIR, Section 6.1.1).

Economic Growth

The proposed project would generate temporary employment opportunities during construction. Since construction workers are expected to be drawn from the existing regional work force, construction of the proposed project would not be growth-inducing from a temporary employment standpoint. However, the proposed project would also add long-term employment opportunities associated with operation of retail and commercial development. SCAG forecasts that 26,000 jobs will be added in the city of Thousand Oaks between 2020 and 2045. The 36 jobs anticipated by the proposed commercial/office development would be approximately 0.1 percent of job growth between 2020 and 2045, and, therefore, would be well within employment forecasts for the city (Draft EIR, Section 6.1.2).

Removal of Obstacles to Growth

The proposed project is located in a fully urbanized area that is well served by existing infrastructure. As discussed in the Draft EIR, existing infrastructure in the citywould be adequate to serve the proposed project. Minor improvements to water, sewer, and drainage infrastructure would be needed to facilitate the construction and operation of the proposed project. Main driveway access to the proposed project site would be provided from Hampshire Road and would extend to the west along a main internal street. Foothill Drive would also be capable of providing access along the southern portion of the site. Access from Foothill Drive would extend

internally to the north, providing access to live/work units along the east side of the Foothill Drive internal road. Vehicles would enter the site centrally via Hampshire Road. The new driveways would not present a significant change to existing area circulation and would be intended to accommodate expected traffic volumes and site access needs; no new roads would be required. Since the proposed project constitutes redevelopment of a parcel with existing though vacant buildings, and the project site is within an urbanized area of the city, and does not require the extension of new infrastructure, proposed project implementation would not remove an obstacle to growth (Draft EIR, Section 6.1.3).

SECTION VIII.
ALTERNATIVES

A. BACKGROUND

The Draft EIR analyzed two alternatives to the proposed project and evaluated these alternatives for their ability to avoid or reduce the proposed project's significant environmental effects while also meeting the majority of the proposed project's objectives. The City finds that it has considered and rejected as infeasible the alternatives identified in the EIR and described below. This section sets forth the potential alternatives to the proposed project analyzed in the EIR and evaluates them in light of the proposed project objectives, as required by CEQA.

Where significant impacts are identified, section 15126.6 of the State CEQA Guidelines requires EIRs to consider and discuss alternatives to the proposed actions. Subsection (a) states:

> (a) An EIR shall describe a range of reasonable 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, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.

Subsection 15126.6(b) states the purpose of the alternatives analysis:

> (b) Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.

In subsection 15126.6(c), the State CEQA Guidelines describe the selection process for a range of reasonable alternatives:

> (c) The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the Project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination. Additional information explaining the choice of alternatives may be included in the administrative record.

> Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.

The range of alternatives required to be considered is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. Alternatives are limited to ones that would avoid or substantially lessen any of the significant effects of the proposed project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project.

B. PROJECT OBJECTIVES

The following objectives have been established for the proposed project (Draft EIR, pgs. 2-15) :

- Ensure the scale of the development respects its surroundings and existing development pattern by reducing the mass and scale further away from Hampshire Road.
- Alleviate the housing crisis by providing housing to help meet the City's Regional Housing Needs Assessment (RHNA) allocation, including 50 dwelling units reserved for Low-Income households, consistent with the State Density Bonus Law.
- Provide redevelopment of an underutilized site with a variety of new commercial and residential uses.
- Cluster development to promote walking and establish a strong sense of neighborhood.
- Reinforce sense of place through project-specific identity signage, including way-finding and blade signs for pedestrian and vehicular traffic.
- Integrate a memorable and pedestrian-friendly public realm, where residents have close access to commercial services and open space. Create a smooth transition between the public and semi-public realm along Hampshire Road and Foothill drive.
- Create new, emerging commercial opportunities on the site with emphasis on establishing a cohesive relationship between public commercial and those working privately from home.
- Provide ample publicly accessible open space and incorporate native plant species to reduce water usage, provide a landscape demonstration area to visitors, and create a comfortable pedestrian environment.
- Add connectivity to existing pedestrian network and open space trail to the southwest.

- Preserve and protect existing oak and landmark trees.
- Locate housing close to job centers along Townsgate Road and Thousand Oaks Boulevard, and medical service providers along Hampshire and Agoura Roads.
- Meet need for neighborhood commercial uses in the area (restaurants and retail).
- Be consistent with the *Thousand Oaks Economic Development Strategic Plan* (November 2017), which identifies the Plan area as an opportunity site.

C. ALTERNATIVES CONSIDERED BUT REJECTED FROM DETAILED ANALYSIS

Section 15126.6(c) of the State CEQA Guidelines specifies that an EIR should (1) identify alternatives that were considered by the lead agency but were eliminated from detailed consideration because they were determined to be infeasible during the scoping process; and (2) briefly explain the reasons underlying the lead agency's determination. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives; (ii) infeasibility; and/or (iii) inability to avoid significant environmental impacts.

- The following alternatives were considered but rejected as part of the environmental analysis for the proposed project (Draft EIR, pg. 5-4): **Reduced Mixed-Use Project.** An alternative that was considered would provide a mix of residential and commercial uses but that would have a reduced footprint to avoid the construction noise impact. However, due to the reduced amount of developable area, development would need to be of a size that would be so small that it would not meet project objectives for additional housing within the City, increased public and private open space, increased commercial uses, and others as listed above. Therefore, this alternative was rejected since it would not meet the project objectives.
- **Reuse Existing Commercial Space.** An alternative that would renovate the existing commercial development and parking area was considered. However, this alternative was rejected as it would not meet any of the project objectives, including providing increased open space, housing, or commercial uses.

Finding: The City Council rejects these alternatives, on the following grounds, each of which individually provides sufficient justification for rejection of this alternative: (1) the alternatives fail to meet most of the basic project objectives.Therefore, these alternatives are eliminated from further consideration.

D. EVALUATION OF ALTERNATIVES SELECTED FOR ANALYSIS

The alternatives selected for further detailed review within the EIR focus on alternatives that could the proposed project's significant environmental impacts, while still meeting most of the basic project objectives. Those alternatives include:

- **Alternative 1: No Project Alternative with Existing Buildings, Parking Lot, and Landscaping Remain (Draft EIR)**
- **Alternative 2: No Project with By-Right Development (Draft EIR)**
- **Alternative 3: Mixed-Use Project with Reduced Density (Draft EIR)**

1. Alternative 1: No Project Alternative

Description: The No Project Alternative assumes that the proposed commercial and residential buildings, subterranean parking, and other accessories, along with landscaping and sustainability features associated with the proposed project are not constructed. Current uses on the project site consist of a one-story retail complex with a large surface parking lot would remain in place under this alternative. (Draft EIR, Section 5.6.1).

Impacts: Draft EIR, Section 5.6.2

- **Aesthetics and Visual Resources** – Under the No Project Alternative, the visual quality on the site would remain the same as the unused retail center and parking lot would be left in place. The current conditions are considered blighted as the retail center is not occupied, the parking lot landscaping is not well-maintained, and the parking lot is cracked at its surface with ruderal vegetation growing in the cracks.

  Scenic views of the local hillsides from US-101 would remain the same as under current conditions, where mature trees and shrubbery along the highway and block walls obscure views of the project site and hillsides to the west and south from US-101 would remain accessible to travelers on the highway. Impacts would be the same as the proposed project. State-designated scenic highways are too distant to be impacted by the project and no impact would occur. Under the No Project alternative, no rezoning of the project site would occur and therefore no conflicts would occur and impacts would be the same as the proposed project. The current visual quality on the site is low due to the abandoned nature of the existing development and continued non-use would result in ongoing deterioration on the site, that would conflict with the current General Plan goals that seek to "provide a high-quality environment, healthful and pleasing to the senses, which values the relationship between maintenance of ecological systems and the people's general welfare." Therefore, visual quality would continue to degrade, and impacts would be greater than the proposed project. Finally, current light and glare conditions on the site are low because the retail uses and the parking lot are non-operational and under the No Project alterative light and glare impacts would be less than the proposed project.

- **Air Quality** – Under the No Project Alternative, the site would remain as-is and would not conflict with the 2016 Ventura County AQMP as no new residential population would be introduced on the site. Population growth would remain within the County's growth forecast and impacts would be the same as the proposed project. Under the No Project Alternative, there would be no construction on the site and thus no construction-generated emissions, with impacts being less than the proposed project. The current development would remain unused and there would be no operational increases in criteria pollutants, although decay of the development components might generate

some fugitive dust as buildings and pavement deteriorate and breakdown. Impacts would be less than the proposed project. The existing project site is developed with buildings, a surface lot, and remnant landscaping. Under the No Project Alternative, no topsoil would be disturbed either during construction or operation and no risk of Valley Fever would occur. Toxic Air Contaminants (TACs) would not increase during construction, as no construction would occur and as the site is currently non-operational, no TACs would be associated with ongoing non-operation. Furthermore, localized CO hotspots that may occur at intersections or at the on-ramps to US-101 would remain the same. No new odors would be introduced as the site is currently non-operational and would remain so under the No Project Alternative. Impacts would be reduced from the proposed project.

- **Biological Resources** – The project site is a paved, developed set of parcels with ruderal vegetation and some mature trees. Under the No Project alternative, this vegetation would remain in place and continue to be viable habitat for nesting birds. The vegetation and vacant structures would also continue to provide potential habitat for special-status bat species (discussed in Section 4.3, Biological Resources). There would, therefore, be no direct impacts to special-status species. However, as vegetation ages or receives limited maintenance attention and as buildings deteriorate, the plants and trees could die, and the habitat would be reduced for nesting birds and bat species. Without mitigation that mandates maintenance of the trees and potential bat roosts, continued deterioration of the existing site components could increased indirect impacts to special-status or sensitive species over those generated by the proposed project.

  The project site contains no riparian habitat or wetlands and does not feature habitat for sensitive species. The No Project Alternative would leave existing development in place. There would be no impact to riparian habitat, wetlands, or to federally or State-protected wetlands or to habitat for sensitive species. Wildlife movement corridors would remain the same under the No Project Alternative as the current landscaping and developed nature of the site does not supply suitable habitat, dense foliage cover, and vegetation communities that would provide nursery sites or contribute to wildlife movement and impacts would be more than the proposed project, which would introduce numerous trees, shrubs, and other habitat within 196,518 sf of open space. The arborist survey discovered 10 protected and landmark trees on the project site (see Appendix C). These trees would remain on the site. However, aside from four coast live oaks (tree numbers 3, 4, 8, and 9), the trees on the site are in poor condition and in a state of decline. However, The No Project Alternative would not replace the eight out of 12 City-protected trees that would die from continual decline, nor would it be subject to mitigation to replace or move the healthy trees; therefore, impacts to protected trees would be greater than that of the proposed project. Finally, the project site is not within an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other local or state conservation plan and the impact would be the same as the proposed project.

- **Cultural Resources and Tribal Cultural Resources** – The existing development on the project site is not considered an historic resource and the archaeological records

search indicated no prehistoric resources have been recorded within the project site. Under the No Project Alternative, construction would not occur, which would eliminate potential impacts to previously unidentified archaeological resources, human remains, and tribal cultural resources. Therefore, impacts to cultural, historic, or tribal resources under the No Project Alternative would be less than the proposed project.

Under the No Project Alternative, the existing development would remain in place and no new excavation would occur. Furthermore, the entire site is paved or developed with an existing shopping center and undeveloped areas do not exist on the site. Therefore, the discovery of tribal cultural resources is unlikely and no impacts would occur under the No Project Alternative. Relative to the proposed project, the No Project Alternative would have equivalent impacts

- **Energy** – The current development on the project site is unoccupied and energy consumption is limited to exterior lighting for safety. Under the No Project Alternative the current conditions would remain in place and no new, energy-saving components would be built. There would be no construction and no increased operational energy consumption. Under the No Project Alternative, the project components would remain inoperable and would therefore not consume energy or obstruct State or local energy reduction plans; however, the site would not facilitate renewable energy generation because solar or other energy-generating components would not be installed. These impacts would be less under the No Project alternative than under the proposed project. Therefore, No Project Alternative would ultimately conflict with the State and local plans for renewable energy and impacts would be greater than the proposed project

- **Geology and Soils** – Under the No Project Alternative, conditions would remain the same as they currently exist at the project site. No active faults exist on the project site and ground rupture would be unlikely. Impacts would be less than significant. The site is, however, subject to ground shaking in the event of a major earthquake. Under the No Project Alternative, the site would remain unoccupied and therefore if severe ground shaking were to occur, the risk of loss, injury, or death would be limited. Impacts would be less than significant. The project site is not within a liquefaction zone, and therefore the risk of related loss, injury, or death would not occur; the associated risk of lateral spreading would be low, and impacts would be less than significant. The project site is not located within an earthquake-induced landslide hazard zone. Therefore, potential impacts under the No Project Alternative associated with landslides would be less than significant. Under the No Project Alternative, no construction would occur and there would be no associated loss of topsoil or erosion. No impact would occur. The project site is not located on an unstable geologic unit and the soil would not become unstable under the No Project Alternative, and there would be no impact. Existing development occurs on a project site that contains expansive soil with medium potential to expand, according to the soil expansion tests performed in 2021 for the proposed project. Expansion could occur and cause significant and unavoidable impacts to existing construction under the No Project Alternative. No construction or excavation would occur under the No Project Alternative that could destroy unique paleontological resources on the site. There are no unique geologic features on the site, which is currently developed with a strip mall and large, surface

parking area. These would remain and no impacts would occur. Overall, under the No Project Alternative, impacts would be the same as the proposed project.

- **Greenhouse Gas Emissions** – The current development on the project site generates minimal GHG emissions, as the site is inoperable. Limited GHG emissions would be associated with occasional maintenance equipment operation and related transportation to the site. Although the site is non-operational, the current development was not developed in accordance with SCAG's 2016-2040 RTP/SCS or the latest CARB Scoping Plan designed to reduce GHG emissions throughout the region and state, respectively. Thus, the No Project Alternative has the potential to conflict with GHG reduction measures through passive emissions. The proposed project would reduce overall GHG emissions by creating a centralized, transit-oriented location within the city and implement Title 24 Building Energy Efficiency Standards and a local Climate Action Plan that would meet and surmount the current CEQA criteria of the blighted site. Though emissions under the No Project Alternative would be less than the proposed project, impacts would be greater than the proposed project.

- **Hazards and Hazardous Materials** – The project site is within a 0.25 mile of a school (at 3277 Foothill Drive), but it is not within the vicinity of an airport or private airstrip. The pre-demolition survey conducted for the proposed project indicated that numerous hazardous materials were present throughout the site, including ACM and LBP, as well as potential sources of PCBs, mercury, radiation, and numerous other potentially hazardous materials` normally associated with commercial buildings of this size and former use. Although no demolition would occur related to the No Project Alternative, continued decay of existing buildings and the existing site conditions with hazardous materials could continue to release the hazardous materials into the environment and impacts would be greater than the proposed project. Unlike the project that would propose mitigation and agency oversight, conditions would continue to perpetuate, and impacts would be greater than the project.

- **Land Use and Planning** – Under the No Project Alternative, the existing buildings would not be demolished, and the project site would remain consistent with the current commercial zoning and current General Plan land use designations. No population growth would occur. No established communities would be divided under the No Project Alternative as no new development would occur. Though the proposed project is inconsistent with some General Plan policies, once the General Plan amendment is adopted, the zoning designation for the Specific Plan can be adopted and considered consistent. After the proposed project rezone, the proposed project would not conflict with any land use plan, policy, or regulation and impacts would be less than significant. Therefore, land use and planning impacts under the No Project Alternative would be the same as those for the proposed project.

- **Noise** – The current development on the site is inoperative. Under the No Project Alternative, no new uses would be developed, and the site would remain vacant. Since the No project Alternative would not require any construction, there would be no changes to existing noise levels at the proposed project site. Impacts would be less than those under the proposed project. In comparison, the proposed project would increase

existing noise over the levels under existing conditions due to temporary construction and operation (permanent) activities. Similarly, the No Project Alternative would not expose people to excessive noise levels from an airport and impacts would be less than those under the proposed project.

- **Population and Housing** – The No Project Alternative would not induce any growth as no new residential units would be built or new jobs generated. Population growth under the proposed project was estimated to be within SCAG forecasts; therefore, impacts would be the same as the proposed project. As no residential units exist on the site currently, the No Project Alternative would not displace people or existing housing and impacts would be the same as the proposed project.

- **Public Services** – As previously mentioned, the current project site is a dilapidated, inoperative commercial structure that does not provide value to the community. Under the No Project alternative, no new residential units would be built and no population growth would be induced. As such, there would be no new demand for increased services from police protection services, fire protection services, or schools that would result in the provision of new or physically altered buildings which could result in significant environmental impacts. Therefore, impacts would be less than the proposed project.

- **Recreation** – The current project site is developed with a non-operational shopping center and is fenced to discourage trespass. The proposed project would provide 4.7 acres of private and common open space for the residents of the city. Compared to the proposed project. The No Project Alternative would not develop new public or private open space and would continue to restrict access to pedestrians and other people seeking recreation. This could contribute to the increased use and deterioration of existing parks as residential development occurs elsewhere in the. The No Project Alternative would keep the existing site conditions in a state of continual disrepair and would not generate new recreational facilities. Therefore, the No Project Alternative impacts would be greater than the proposed project.

- **Transportation and Traffic** – Under the No Project alternative, transportation and traffic would remain at current conditions. The proposed project is anticipated to generate an average daily residential VMP per capita within the project TAZ that is 29 percent below the citywide average. Therefore, overall traffic impacts under the No Project Alternative would be less significant, and less than the proposed project.

- **Utilities and Service Systems** – Under the No Project Alternative, no new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities would be built as the project site would remain the same as existing conditions. There would be no new residential or commercial development under the No Project Alternative and the existing commercial center would remain inoperative. Therefore, there would be no increased demand for water or wastewater treatment, and solid waste would not be generated. Under the No Project Alternative impacts would be less than the proposed project.

- **Wildfire** – Under the No Project Alternative, the project site would remain developed with the existing, nonoperational shopping center and new residential uses would not be constructed. Therefore, the No Project Alternative would not interfere with the implementation of an emergency response or evacuation plan and no impact would occur. The adjacent open space to the west of the project site is categorized as a Very High FHSZ by CALFIRE. However, the No Project Alternative would not exacerbate wildfire risks over the existing conditions and impacts would be less than significant. Likewise, the No Project Alternative would not 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 and impacts would be less than significant. If a wildfire were to occur in adjacent open space, there is potential for landslide to occur, but based on slope and historic trends, this is unlikely. Impacts would be less than significant. The proposed project and subsequent project are required to comply with city, State, and federal regulations designed to reduce and avoid wildfire impacts. The proposed project would have less impacts than leaving the site as is under the current codes. Therefore, the No Project Alternative would currently have an equivalent level of impact in relation to the proposed project and potentially greater impact than the proposed project in the future if the site is not updated and maintained to code.

Attainment of Project Objectives: The No Project Alternative would not fulfill any project objectives, described above, because the existing conditions on the project site would not support the City's RHNA obligation by providing residential units in a range of income categories; nor would it help develop a sense of place through high-quality commercial and residential development with gathering places and opportunities to allow emerging commercial and work-from-home jobs. The No Project Alternative would also fail to create a unique pedestrian environment with connectivity to nearby and adjacent open spaces and other commercial centers.

Finding: The City Council rejects Alternative 1: No Project Alternative, on the following grounds: (1) the alternative fails to meet most of the basic project objectives. proposed project objectives.

2. Alternative 2: No Project with By-Right Development

Description: Under Alternative 2, the project site would not be rezoned, and the land uses would remain the same; the General Plan land use designation would remain "Commercial," and the zoning would remain "Neighborhood Shopping Center (C-1). The proposed project would not be built as residential uses would not be permitted. However, the site could be developed "by-right," which means that any project that complies with local zoning and land use regulations would be permitted and would be exempt from CEQA. No public hearing or public comment on the project would be required. C-1 zoning is intended for planned neighborhood shopping centers where the retail stores and associated facilities are designed and developed as an integrated unit with a primary tenant (supermarket or drug store) and other retail serving uses for residential area. (Draft EIR, Section 5.7.1).

Impacts: Draft EIR, Section 5.7.2

- **Aesthetics** – Under the Alternative 2, the visual quality would improve from existing conditions, but as the development design would likely be similar to the adjacent commercial uses, and a large surface parking lot, the design would not include public open spaces, community gathering places, and the generous landscaping plan required of the mixed-use development the proposed project would implement. Impacts would be beneficial compared to existing conditions but not as beneficial as the proposed project.

  Scenic views of the local hillsides from US-101 would remain the same as under current conditions, where mature trees and shrubbery along the highway and block walls obscure views of the project site and hillsides to the west and south from US-101 would remain accessible to travelers on the highway. Impacts would be less than significant. State-designated scenic highways are too distant to be impacted by the project and no impact would occur. Under Alternative 2, no rezoning of the project site would occur and therefore no conflicts would occur. However, the implementation of another commercial center with a large, surface parking lot and no landscaping or placemaking opportunities, as provided in the proposed project would conflict with the current General Plan goals that seek to "provide a high-quality environment, healthful and pleasing to the senses, which values the relationship between maintenance of ecological systems and the people's general welfare." Alternative 2 visual quality impacts would be significant and unavoidable. Nonetheless, impacts would beneficial compared to existing conditions but not as beneficial as the proposed project.

- **Air Quality** – Temporary construction-related air quality impacts associated with this alternative would be less than as those of the proposed project since the overall amount and duration of construction would be less due to less excavation associated with subterranean parking and taller buildings.

  A commercial center such as that allowed by C-1 zoning necessarily involves vehicle trips as it is designed for automobile travel and would involve shoppers driving from their homes or other locations to the shopping center and back. Under Alternative 2, there would be no emphasis on pedestrian and non-motorized modes of travel as most consumers would live too far from the shopping center to walk, particularly when carrying purchases. Therefore, during operation, this alternative can be reasonably expected generate more daily vehicle trips than the proposed project, on a scale of up to approximately 120 percent, as a direct effect of the single commercial use and the exclusion of residential and other mixed uses. The proposed project's operational air quality emissions would be well below Ventura County APCD's thresholds. In fact, the alternative would increase the associated vehicle trips to the extent that they could exceed Ventura County APCD threshold for operational emissions. Additionally, the commercial uses would generate an estimated 281 employees. Such employment growth is anticipated in SCAG forecasts for Thousand Oaks. However, because of increased vehicle trips generated by Alternative 2, impacts would be more substantial than the proposed project.

- **Biological Resources** – Under Alternative 2, existing structures and paving would be removed and replaced with new structures and landscaping. The vegetation and vacant structures would no longer be available as potential habitat for special-status bat species (discussed in Section 4.3, Biological Resources). Projects under Alternative 2 would not undergo further CEQA evaluation and thus the presence of special-status species would not be evaluated as part of the permitting process. Therefore, impacts would be greater than those under the proposed project.

  It can be reasonably assumed that Alternative 2 would remove existing, on-site vegetation, including heritage or landmark trees. These could be replaced with new landscaping, but to a lesser degree of density than the proposed project. Tree removal would continue to be subject to the City's permitting process, but replacement would not necessarily occur on the project site and thus, impacts would be greater than those under the proposed project.

- **Cultural Resources and Tribal Cultural Resources**– The existing development on the project site is not considered a historic resource and the archaeological records search indicated no prehistoric resources have been recorded within the project site. Under the Alternative 2, demolition of the existing structures and paved parking area would occur and the construction of new buildings and parking area would involve excavation to existing depths, making discovery of unknown archaeological resources unlikely. However, as a by-right project, Alternative 2 would not be subject to monitoring or other mitigation measures that would apply to the proposed project and therefore, if such cultural resources discoveries were to occur, impacts could be substantially more than those under the proposed project.

  Grading and other ground-disturbing activities on the site under Alternative 2 could result in impacts to previously unidentified tribal cultural resources. Under by-right development provisions, Alternative 2 would not have to undergo AB 52 consultation and mitigation related to tribal consultation would not be required. Impacts would be greater than under the proposed project.

- **Energy** – The project site is currently unoccupied and energy consumption is limited to exterior lighting for safety. Under Alternative 2, energy consumption would increase over existing conditions but would likely be less than the proposed project. Furthermore, all projects are subject to the California Green Building Code, which, among other mandates, requires net-zero energy consumption by means of on-site renewable energy generation. Therefore, impacts would be similar to the proposed project.

- **Geology and Soils** – No active faults exist on the project site and ground rupture would be unlikely. Impacts would be less than significant under the Alternative 2 and proposed project. The site is, however, subject to ground shaking in the event of a major earthquake. Under Alternative 2, the on-site uses would be occupied only during business hours, reducing the amount of time people spend on the site. This would reduce the factor for possible risk to life in the event of severe ground shaking and make impacts less than the project site. The project site is not within a liquefaction

zone, and therefore the risk of related loss, injury, or death would not occur; the associated risk of lateral spreading would be low, and impacts would be the same as the proposed project. Alternative 2 would involve grading, including removal of soil and fill, but adherence to construction best practices would ensure that there would be no associated loss of topsoil or erosion and impacts would be the same as the proposed project. Existing development occurs on a project site that contains expansive soil with medium potential to expand, according to the soil expansion tests performed in 2021 for the proposed project. Expansion could occur and cause significant and unavoidable impacts that would be the same as for the proposed project.

- **Greenhouse Gas Emissions** – Temporary construction-related GHG impacts associated with Alternative 2 would be slightly less than those of the proposed project as the amount and duration of construction would be less due to the reduction in building size. The removal of residential uses under this alternative would generate more daily vehicle trips due to the nature of the commercial complex designed for motorists and not to encourage a range of transportation modalities. The proposed project's GHG emissions would within the CEQA threshold. Similarly, Alternative 2 would likely generate the same or less GHG emissions and overall impacts related to GHGs would be the same or less than those of the proposed project. Alternative 2 would not conflict with applicable plans or policies related to GHG emissions since it would entail infill development that would comply with applicable energy conservation requirements and implement proposed sustainability features, although vehicle miles could be increased.

- **Hazards and Hazardous Materials** – As discussed in Section 2, Project Description, the project site is within a 0.25 mile of a school (at 3277 Foothill drive), but it is not within the vicinity of an airport or private airstrip. The pre-demolition survey conducted for the proposed project indicated that numerous hazardous materials were present within the buildings and development on the site, including ACM and LBP, as well as potential sources of PCBs, mercury, radiation, and numerous other potentially hazardous materials normally associated with commercial buildings of this size and former use. Thus, demolition associated with Alternative 2 would have the same potential impacts as the proposed project. The commercial shopping center developed under this alternative would be required to comply with all applicable codes and regulations pertaining to the handling of hazardous materials, emergency response, and fire protection. Based on the type of commercial uses that are permitted in the C-1 zone, development under this alternative could not involve the routine transport, use, storage, or disposal of hazardous materials if the center included dry cleaners, service stations, and other businesses that require hazardous materials as part of their operations. Impacts would be greater than the proposed project, which includes offices, restaurants, and retail uses along with residential uses.

- **Land Use and Planning** – Under Alternative 2, the existing buildings would be demolished, and new development would be consistent with the current commercial zoning and current General Plan land use designations such that impacts would be less than under the proposed project, which requires a General Plan land use amendment and a zoning change. No established communities would be divided under the

Alternative 2 as new development would occur within the same project footprint as existing development. Therefore, land use and planning impacts under the No Project Alternative would be the same as those for the proposed project.

- **Noise** – Maximum daily noise levels associated with construction of Alternative 2 would be similar to those of the proposed project; however, the overall duration of construction would be less. Nonetheless, construction activity for either this alternative or the proposed project would be limited to daytime hours, avoiding generation of high noise or vibration levels when residents are most sensitive to them. Therefore, construction and vibration impacts would also be significant.

  In the long term, exposure of future on-site residents to noise would be eliminated as Alternative 2 would have no residents. However, redevelopment of the commercial use would increase noise over existing conditions from stationary sources on the site and from increased traffic that would incrementally increase mobile noise sources on local streets. This would include early morning and weekend deliveries to the commercial uses. Overall noise increases would, however, remain below the City's thresholds. Therefore, impacts associated with noise would be roughly the same as under the proposed project.

- **Population and Housing** – Alternative 2 would not induce growth related to on-site residential units as it would be only a commercial use. However, up 281 new jobs could be generated by new commercial uses associated with Alternative 2. These would likely be met by existing population in nearby communities but could require that some people relocate to Thousand Oaks. Impacts would, nonetheless, be less than the proposed project.

- **Public Services** – Alternative 2 would not result in any residential development and land use designation would remain Commercial. As such, there would be no new demand for increased services from police protection services, fire protection services, or schools that would result in the provision of new or physically altered buildings which could result in significant environmental impacts. Therefore, impacts would be less than the proposed project.

- **Recreation** – Alternative 2 would not introduce new residents to the extent that new park facilities would be required. However, it would also not be required to implement public open spaces, such as the proposed project would provide. Therefore, while existing recreational facilities would not deteriorate from implementation of Alternative 2, neither would the beneficial impacts of the proposed project be gained. Since the current site does not have park facilities, the impact of Alternative 2 would be greater than the proposed project.

- **Transportation and Traffic** – Alternative 2 would build a new, similar commercial center to what is currently on the project site. The plan would encourage more vehicle trips by the nature of the shopping center design, with retail and service uses on 25 percent of the project site and parking on 75 percent of the site. Alternative 2 would

not be designed to encourage non-motorized modes of transportation and would not facilitate pedestrian uses. Impacts would be greater than under the proposed project.

- **Utilities and Service Systems** – Under the Alternative 2, no new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities would be built as new development would be roughly the same as existing development in terms of capacity and demand. There would be no new residential development with associated infrastructure needs. Therefore, impacts would be less than under the proposed project.

- **Wildfire** – Under Alternative 2, the project site would be redeveloped with commercial uses that would include a large, surface parking lot and limited vegetation. It would also include no residential uses. The adjacent open space to the west of the project site is categorized as a Very High FHSZ by CALFIRE. However, the Alternative 2 would not exacerbate wildfire risks over the existing conditions and impacts would be less than those for the proposed project. If a wildfire were to occur in adjacent open space, there is potential for landslide to occur on the project site, but based on slope and historic trends, impacts would be the same or less than those for the proposed project.

Attainment of Project Objectives: Alternative 2 would not fulfill the project objectives to support meeting the City's RHNA obligation as no residential units would be included in the project. Furthermore, the project would not meet other project objectives that seek to implement mixed-use infill, cluster development that promotes walking, integrate pedestrian-friendly residential access to commercial services and open space, provide open space on the project site, or situate residential uses close to jobs on Townsgate Road and Thousand Oaks Boulevard.

Finding: The City Council rejects Alternative 2: No Project with By-Right Development, on the following grounds, each of which individually provides sufficient justification for rejection of this alternative: (1) the alternative to meet most of the basic project objectives

3. Alternative 3: Mixed-Use Project with Reduced Residential Density

Description: Under Alternative 3, development would involve demolition of the existing commercial center, paved parking area, and on-site vegetation, similar to the proposed project. Alternative 3 would redevelop the site with a mixed-use plan like that of the proposed project but with only 329 residential units, 91 fewer than the proposed project. This would mean that Alternative 3 would not include any density bonus units or 50 low-income housing units to meet RHNA requirements, and thus would not contribute as fully to meeting the City's RHNA requirement as would the proposed project. Alternative 3 would meet most of the project objectives but would not be consistent with the State density bonus law (California Government Code Section 65915). (Draft EIR, Section 5.8.1).

Impacts: Draft EIR, Section 5.8.2

- **Aesthetics** – Under the Alternative 3, the visual quality would improve from existing conditions, as development design would be similar to that presented for the proposed

project, with clustered development in a pedestrian-friendly, open space memorable environment, with a strong sense of neighborhood.

Scenic views of the local hillsides from US-101 would remain the same under Alternative 3 as for the proposed project, where mature trees and shrubbery along the highway and block walls obscure views of the project site and hillsides to the west and south. Impacts would be less than significant. State-designated scenic highways are too distant to be impacted by the project as well as by Alternative 3 and no impact would occur. Under Alternative 3, rezoning would occur but development would be subject to the design guidelines and the Thousand Oaks Specific Plan provisions that govern visual quality and architectural design. Light and glare sources would increase compared to existing conditions but would be subject to the City's ordinances that govern light and glare in new development. Impacts would be similar to the proposed project.

- **Air Quality** – Temporary construction-related air quality impacts associated with this alternative would be the same as those of the proposed project since the overall amount and duration of construction would be roughly the same, with or without the increased residential density (91 Measure E units).

  Operational impacts would also be roughly the same as the proposed project, as estimated maximum daily operational emissions would be the same or less than those estimated for the proposed project. Employment growth would remain the same and the number of potential residents would decrease by up to 280 persons. However, like the proposed project, Alternative 3 would be designed to promote alternative modes of transportation and access to services and shopping within walking distance, reducing vehicle trips and related emissions. Furthermore, as for all development within the City, Alternative 3 would be required to conform to the provisions of CALGreen and the release of criterion pollutants would be reduced. Impacts would be the same or less than the proposed project.

- **Biological Resources** – Under Alternative 3, existing structures and paving would be removed and replaced with new structures and landscaping that would include ample open space with trees and other native plant species. As with the proposed project, these could provide ongoing habitat for nesting birds and federally and/or State-listed bat species. Furthermore, Alternative 3 would be subject to the same pre-construction surveys and mitigation as the proposed project and impacts would be the same as the proposed project.

- **Cultural Resources and Tribal Cultural Resources**– The existing development on the project site is not considered a historic resource and the archaeological records search indicated no prehistoric resources have been recorded within the project site. Under Alternative 3, demolition of the existing structures and paved parking area would occur, and the construction of new buildings and parking area would involve excavation to depths that could exceed those previously obtained, making discovery of unknown archaeological resources possible. Alternative 3 would be subject to the same monitoring and mitigation as the proposed project and impacts would be the same.

Grading and other ground-disturbing activities on the site under Alternative 3 could result in impacts to previously unidentified tribal cultural resources. As with the proposed project, mitigation measures recommended through the tribal consultation process would also apply to Alternative 3 and impacts would be the same.

- **Energy** – The current development on the project site is unoccupied and energy consumption is limited to exterior lighting for safety. Under Alternative 3, energy consumption would likely be slightly less than the proposed project. However, all projects are subject to the California Green Building Code, which, among other mandates, requires net-zero energy consumption by means on on-site renewable energy generation. Therefore, impacts would be the same as under the proposed project.

- **Geology and Soils** – No active faults exist on the project site and ground rupture would be unlikely. Impacts would be less than significant currently and in both Alternative 3 and the proposed project. The site is, however, subject to ground shaking in the event of a major earthquake. The project site is not within a liquefaction zone, and therefore the risk of related loss, injury, or death would not occur; the associated risk of lateral spreading would be low, and impacts would be the same as the proposed project. Alternative 3 would involve grading, including removal of soil and fill, but construction best practices are to equal the cut and fill so there would be no associated loss of topsoil or erosion and impacts would be the same as the proposed project. Existing development would occur on a site that contains expansive soil with medium potential to expand, according to the soil expansion tests performed in 2021 for the proposed project. Expansion could occur and cause significant and unavoidable impacts that would be the same as for the proposed project.

- **Greenhouse Gas Emissions** – Temporary construction related GHG impacts associated with Alternative 3 would be approximately the same as those of the proposed project as the amount and duration of construction would be about the same even with 91 fewer residential units. The proposed project's GHG emissions would within the CEQA threshold and Alternative 3 would likely generate the same or slightly less GHG emissions due to a design that encourages pedestrian travel and alternative forms of transportation. Alternative 3 would not conflict with applicable plans or policies related to GHG emissions since it would entail infill development that would comply with applicable energy conservation requirements and implement proposed sustainability features. Overall impacts related to GHGs would be the same or less than those of the proposed project.

- **Hazards and Hazardous Materials** – The project site is within a 0.25 mile of a school (3277 Foothill drive), but it is not within the vicinity of an airport or private airstrip. The pre-demolition survey conducted for the proposed project indicated that numerous hazardous materials were present throughout the buildings on the site, including ACM and LBP, as well as potential sources of PCBs, mercury, radiation, and numerous other potentially hazardous materials normally associated with commercial buildings of this size and former use. Thus, demolition associated with Alternative 3 would have the same potential impacts as the proposed project.

The commercial shopping center developed under this alternative would be required to comply with all applicable codes and regulations pertaining to the handling of hazardous materials, emergency response, and fire protection. Based on the type of commercial uses that are permitted in the C-1 zone, development under this alternative could not involve the routine transport, use, storage, or disposal of hazardous materials if the center included dry cleaners, service stations, and other businesses that require hazardous materials as part of their operations. Impacts would be greater than the proposed project, which includes offices, restaurants, and retail uses along with residential uses

- **Land Use and Planning** – Under Alternative 3, the project site would be developed with mixed-use infill that would place residences proximate to commercial and restaurant uses. As with the proposed project, rezoning and General Plan land use designation amendments would be required. No established communities would be divided under the Alternative 3 as new development would occur within the same project footprint as existing development, and the site is currently vacant. The overall impact would be the same as the proposed project with same rezoning.

- **Noise** – Maximum daily noise levels associated with construction of Alternative 3 would be similar to those of the proposed project; however, the overall duration of construction would be less. Nonetheless, construction activity for either this alternative or the proposed project would be limited to daytime hours, avoiding generation of high noise or vibration levels when residents are most sensitive to them. Therefore, construction and vibration impacts would also be significant under Alternative 3 as under the proposed project.

  In the long term, exposure of future on-site residents to noise would be the same as that of the proposed project, with reductions in mobile sources of noise due to the encouragement of alternative modes of transportation. Overall noise increases would, however, remain below the City's thresholds. Therefore, impacts associated with noise would be roughly the same as under the proposed project

- **Population and Housing** – Alternative 3 would introduce 329 new residential units to Thousand Oaks, with an associated potential of 1,013 new residents. This is approximately 281 fewer residents than the proposed project. The Draft EIR determined that population growth under the proposed project was within SCAG estimates and this would also be the case for Alternative 3. Impacts would, nonetheless, be less than the proposed project.

- **Public Services** – Alternative 3 would introduce a potential of 1,294 new residents which is 218 fewer residents than the proposed project. Under the proposed project, no modified or new public services facilities were determined to be needed as a result of induced growth. As such, Alternative 3 would induce growth, but not so much as to necessitate new public services facilities, the construction of which could cause significant environmental impacts. Therefore, impacts would be the same as the proposed project.

- **Recreation** – Alternative 3 would introduce up to 1,013 new residents who could use parks within the city. However, like the proposed project, Alternative 3 would provide ample open space that could accommodate much of the new residents' need. Furthermore, like the proposed project, Alternative 3 would provide connectivity to adjacent open space, increasing access. Existing recreation facilities would not deteriorate under Alternative 3 and impacts would be the same as the proposed project.

- **Transportation and Traffic** – Alternative 3 would build residential development similar to the proposed project, but with only 329 residential units, 91 fewer than the proposed project. As such, Alternative 3 would generate average daily residential VMT per capita less than that of the proposed project, which is already 29 percent below the existing citywide average. Therefore, Alternative 3 would generate less traffic congestion than under the proposed project. Impacts would be less than under the proposed project.

- **Utilities and Service Systems** – Under the Alternative 3, utility service systems related to SCE and SoCalGas would need to be relocated or removed. These would be handled in accord with best management practices that would prevent environmental impacts and their removal would not create the need for new infrastructure, as with the proposed project. Increased telecommunications needs of the new businesses and residences associated with Alternative 3 would be the same as for the proposed project. As such, impacts under Alternative 3 would be the same as those for the proposed project.

- **Wildfire** – Under Alternative 3, the project site would be redeveloped with residential and commercial uses along with ample open space and maintained landscaping. The project itself would not create additional risk of wildfire as it is located in an urbanized area. However, adjacent open space to the west of the project site is categorized as a Very High FHSZ by CALFIRE. If a wildfire were to occur in adjacent open space, there is potential for landslide to occur on the project site, but based on slope and historic trends, impacts would be the same as those for the proposed project.

Attainment of Project Objectives: Alternative 3 would not fulfill all the primary objectives and would not achieve any of the project objectives to the extent the proposed project would.

Finding: The City Council rejects Alternative 3: Mixed-Use Project with Reduced Residential Density, on the following grounds: (1) the alternative fails to meet the most basic project objectives.

E. ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Section 15126.6(e)(2) of the State CEQA Guidelines indicates that an analysis of alternatives to a proposed project shall identify an environmentally superior alternative among the alternatives evaluated in an EIR. Based on the alternatives analysis contained within the Draft EIR) the Mixed-Use Project with Reduced Residential Density (Alternative 3) is identified as the Environmentally Superior Alternative because it would reduce air quality, energy, GHG, noise, population and housing, recreation, transportation

and traffic, and utilities impacts slightly in comparison to the proposed project. Alternative 3 would also reduce the potential for the City to meet its Regional Housing Needs Allocation obligations (Draft EIR, Section 5.9). However, Alternative 3 would not fulfill the primary objectives of the proposed project.

SECTION IX.
ADOPTION OF STATEMENT OF OVERRIDING CONSIDERATIONS

CEQA Statement of Overriding Considerations

The City of Thousand Oaks (City) is the Lead Agency under the California Environmental Quality Act (CEQA) for the preparation, review, and certification of the Final Environmental Impact Report (FEIR) for the proposed project. As the Lead Agency, the City is responsible for determining the potential environmental impacts of the project and which of those impacts are significant, which can be mitigated to a less than significant level, and which remain significant but unavoidable even with mitigation measures. CEQA then requires the Lead Agency to balance the benefits of the proposed project against any significant and unavoidable environmental impacts in determining whether to approve the proposed project according to the CEQA Guidelines Section 15093 which state:

(a) CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposal project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable."

(b) When the lead agency approves a project which will result in the occurrence of significant effects which are identified in the Final EIR but are not avoided or substantially lessened, the agency shall state in writing the specific reasons to support its action based on the Final EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record.

(c) If an agency makes a statement of overriding considerations, the statement should be included in the record of the project approval and should be mentioned in the notice of determination. This statement does not substitute for, and shall be in addition to, findings required pursuant to Section 15091.

If the benefits of the project outweigh the unavoidable adverse effects, those effects may be considered "acceptable" and the lead agency should provide support, in writing, the specific reasons for considering a project acceptable when significant impacts are infeasible to mitigate. Such reasons must be based on substantial evidence in the Final EIR (CEQA Guidelines Section 15093[b]). The agency's statement is referred to as a "Statement of Overriding Considerations."

The following provides a description of each of the project's significant and unavoidable impacts after implementation of all feasible mitigation measures, and the justification for adopting a statement of overriding considerations.

Significant and Unavoidable Adverse Impacts

Q. Noise

1. Noise Standards

Threshold

Would the project result in the 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?

Finding

Significant and Unavoidable (Draft EIR)

Mitigation Measure NOI-1, discussed below, has been required in, and incorporated into, the project which lessens the significant environmental effects as identified in the Draft EIR. (CEQA Guidelines, Section 15091(a)(1).) However, impacts would remain significant and unavoidable. Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible additional mitigation measure or project alternatives. (CEQA Guidelines, Section 15091(a)(3).)

After balancing the project's economic, legal, social, technological, and other benefits, including region-wide or statewide environmental benefits, against its unavoidable environmental risks, such benefits outweigh the unavoidable adverse environmental effects, and thus the adverse environmental effects are considered acceptable. (CEQA Guidelines, Section 15093.)

Explanation

Construction

The highest construction noise levels would be generated by vibratory pile driving during the building construction phase. The average noise levels from construction equipment at the closest sensitive receiver location, which is the preschool, as well as other nearby sensitive receivers, are shown in Table 4.10-4 in the Draft EIR. These noise levels are based on the previously described Roadway Construction Noise Model (RCNM) with an individual piece of construction equipment operating at the edge of construction activity.

Based on the noise levels in Table 4.10-4 in the Draft EIR, when concrete saws operate near the project boundary construction activity noise levels would reach 93.5 decibels (dB) L_{eq}, which would occur at the preschool. The building would be expected to have an exterior-to-interior noise reduction of 12 dB with windows open and 24 dB with windows closed, assuming typical warm climate construction (U.S. Environmental Protection Agency 1978). Therefore, interior noise levels at the nearest noise-sensitive receiver would reach up to 81.5 dB L_{eq} with windows open and 69.5 dB L_{eq} with windows closed. In addition, construction noise levels would exceed the 10 dB increase threshold at the other nearby sensitive receivers analyzed in Table 4.10-4 in the

Draft EIR.

To analyze sensitive receivers further from construction than those analyzed in Table 4.10-4 in the Draft EIR, the loudest piece of construction equipment (vibratory pile driver) was analyzed. Vibratory pile driver noise levels at these receivers are shown in Table 4.10-5 in the Draft EIR; as shown, construction noise levels would not exceed the 10 dB increase threshold at these receivers. As other construction equipment is quieter than the vibratory pile driver, all construction activities would not exceed the 10 dB increase threshold at these receivers.

Table 4.10-4 in the Draft EIR shows, project construction equipment during all construction phases would increase noise levels at the nearest sensitive receivers by 10 dB or more, which humans perceive as a doubling of loudness. With mitigation, construction noise impacts would be reduced, however they would remain significant and unavoidable.

Operation

Operational Heating Ventilation and Air Condition (HVAC) noise increases over ambient noise levels would range from less than 1 decibels using the A-weighted sound pressure level (dBA) Community Noise Equivalent Level (CNEL) to 2 dBA CNEL at noise sensitive uses adjacent to the project site (Appendix G). These noise level increases would be below the City's threshold of a 3 dB or more increase for areas that experience a noise level of 55 dBA CNEL to 60 dBA CNEL and the City's threshold of a 1.5 dBA or more increase for areas that experience a noise level of 65 dBA CNEL to 70 dBA CNEL with the project. In addition, a noise level increase of less than 3 dBA would not be perceptible to the human ear in an outdoor environment. Therefore, a substantial noise increase would not occur, and HVAC noise impacts would be less than significant.

The proposed project would generate new vehicle trips that would increase noise levels on nearby roadways.

Due to the relatively small increase in overall average daily traffic (ADT) volumes from project-generated traffic, the noise level increases would range between less than 1 dBA CNEL to be 2 dBA CNEL, when comparing existing to existing plus and cumulative to cumulative plus project traffic scenarios. These noise level increases would be below the City's noise thresholds of a 3 dBA increase to 55 dBA – 60 dBA CNEL, a 1.5 dBA increase to 60 dBA – 70 dBA CNEL, or a 1 dBA increase to more than 70 dB CNEL. Furthermore, the project's traffic noise increase would not exceed 3 dBA or more, and impacts would be less than significant.

To reduce potential impacts, Mitigation Measure NOI-1 is to be implemented to reduce construction related noise impacts to sensitive receivers. The City hereby finds that implementation of the mitigation measure is feasible, and the measure is therefore adopted.

NOI-1 Construction Noise Reduction Measures

- Temporary construction barriers along the southern edge of the project site facing the Westlake Villas multifamily residences at 575 Hampshire Road and along the northwestern edge of the project facing the Windsor Terrace of Westlake Village convalescent home at 250 Fairview

Road shall be in place during the Project construction (including demolition, grading, and site preparation), when heavy construction equipment is used, excluding areas where gaps in the barrier are necessary for access. The barrier shall be least 12 feet in height above the project site existing grade level and constructed of a material with a Sound Transmission Class (STC) rating of at least STC-31 (such as acoustic panels or sound barrier products) or a transmission loss of at least 21 dB at 500 hertz (such as 3/4-inch plywood), which would provide an insertion loss (net barrier reduction) of up to 11 dB at the convalescent home and multifamily residences.

- Power construction equipment (including combustion engines), fixed or mobile, shall be equipped with state-of-the-art noise shielding and muffling devices (consistent with manufacturers' standards). All equipment shall be properly maintained to assure that no additional noise, due to worn or improperly maintained parts, would be generated.
- With the exception of excavation equipment, grading and construction contractors shall use rubber-tired equipment rather than metal-tracked equipment.
- The use of on-site electrical power shall be preferred to the use of stationary construction equipment such as generators or air compressors. If stationary construction equipment would be used on site for more than one hour in a day, such equipment shall be placed as far as possible from off-site sensitive receivers. Stationary construction equipment shall also be shielded by either noise blankets or by temporary noise barriers at least three feet taller and six feet wider than the noise source.
- Construction staging and delivery areas shall be located towards the center of the property and a minimum of 100 feet from the project lines.
- The project applicant shall post a notice at the construction site. The notice shall contain information on the type of project, anticipated duration of construction activity, and provide a phone number where people can register questions or complaints. The notice shall be posted no later than 72 hours prior to the planned activity.
- Based on areas of construction noise impacts, the preschool, the Windsor Terrace of Westlake Village convalescent home, the single-family residences and multifamily communities to the west (along Foothill Drive, south of Fairview Road), and the Westlake Villas apartment community to the south shall be informed via mail and posting at the site of the anticipated start date, duration, noise impact, and other pertinent information prior to the construction of the project. Notification shall also include a phone number where people can register questions or complaints. Notification shall also be delivered no later than 72 hours prior to the planned activity.
- An on-site construction manager shall be responsible for responding to local complaints about construction noise. All notices that are sent to sensitive receivers and all signs posted at the construction site shall list the telephone number for the on-site construction manager.
- Construction supervisors shall be informed of project-specific noise requirements, noise issues for sensitive land uses adjacent to and near the project construction site, and/or equipment operations to ensure compliance with the required regulations and best practices.

Implementation of Mitigation Measure NOI-1 would reduce construction noise levels by up to 11 dB through use of the temporary construction noise barrier. However, a temporary construction noise barrier is not proposed for the preschool and the residences west of the project site on Foothill Drive that are elevated approximately 30 feet to 40 feet above the project site because a

construction noise barrier would not be tall enough to block line of sight from the project construction equipment to these receivers. Even with the barrier, when pile driving occurs project construction-related noise increases in ambient noise levels would still be greater than 10 dB at the Westlake Villas multifamily residences to the south during the building construction phase and at the Windsor Terrace of Westlake Village convalescent home during the demolition, site preparation, grading, building construction, and paving phases of construction, as shown on Table 4.10-6 of the Draft EIR. In addition, the magnitude of the project's temporary construction noise levels relative to the ambient levels is such that even a maximally-effective noise barrier would not feasibly reduce project construction-related noise increases to below the 10 dB increase threshold during other, non-pile driving activities. Therefore, construction noise impacts after mitigation would be significant and unavoidable at these receivers.

Given the location of the sensitive receptors and the inherent nature of the construction techniques involved (i.e., pile driving), there are no other feasible mitigation measures or alternatives that would mitigate this impact to a less-than-significant level, taking into consideration specific economic, legal, social, technological or other factors, including considerations for the provision of affordable housing and employment opportunities.

After balancing the specific economic, legal, social, technological, and other benefits of the project, the City of Thousand Oaks has determined that the unavoidable adverse environmental impacts identified above may be considered "acceptable" due to the following specific considerations, which outweigh the unavoidable, adverse environmental impacts of the project.

The project will implement the following objectives that were established for the benefit of both the project area and the City more generally:

- Ensure the scale of the development respects its surroundings and existing development pattern by reducing the mass and scale further away from Hampshire Road.
- Alleviate the housing crisis by providing housing to help meet the City's Regional Housing Needs Assessment (RHNA) allocation, including 50 dwelling units reserved for Low-Income households, consistent with the State Density Bonus Law.
- Provide redevelopment of an underutilized site with a variety of new commercial and residential uses.
- Cluster development to promote walking and establish a strong sense of neighborhood.
- Reinforce sense of place through project-specific identity signage, including way-finding and blade signs for pedestrian and vehicular traffic.
- Integrate a memorable and pedestrian-friendly public realm, where residents have close access to commercial services and open space. Create a smooth transition between the public and semi-public realm along Hampshire Road and Foothill drive.
- Create new, emerging commercial opportunities on the site with emphasis on establishing a cohesive relationship between public commercial and those working privately from home.
- Provide ample publicly accessible open space and incorporate native plant species to reduce water usage, provide a landscape demonstration area to visitors, and create a comfortable pedestrian environment.
- Add connectivity to existing pedestrian network and open space trail to the southwest.

- Preserve and protect existing oak and landmark trees.
- Locate housing close to job centers along Townsgate Road and Thousand Oaks Boulevard, and medical service providers along Hampshire and Agoura Roads.
- Meet need for neighborhood commercial uses in the area (restaurants and retail).
- Be consistent with the *Thousand Oaks Economic Development Strategic Plan* (November 2017), which identifies the Plan area as an opportunity site.

1. The proposed project includes development that would accommodate anticipated population growth in the city and existing unmet need for housing, as required by the City's 6th Cycle Regional Housing Needs Assessment (RHNA) Allocation and in a manner consistent with the City's General Plan and the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) prepared by the Southern California Association of Governments (SCAG). The City is mandated, pursuant to State Housing Element law, to accommodate the 2021 to 2035 RHNA allocation of 2,621 units. The RHNA allocation, prepared by the California Department of Housing and Community Development (HCD) and SCAG, reflects the number of housing units that must be provided to meet the forecasted population growth and the need for housing among the existing population. The proposed project would develop 420 units, including 50 dwelling units reserved for Low-Income households, which would help to accommodate the City's RHNA allocation.

2. The proposed project is consistent with Senate Bill 375 by implementing infill housing development within close proximity to public transit, near job centers, and in higher resource areas, consistent with Senate Bill 375 and the RTP/SCS, and therefore, would contribute to decreasing regional vehicle miles traveled and mobile-source greenhouse gas emissions in the region.

3. The proposed project is consistent with the RTP/SCS and would contribute to meeting SCAG goals including promoting diverse housing choices, leveraging technology innovations, supporting implementation of sustainability policies, and promoting a green region. The proposed project would include a multitude of different types of housing (studios, one-bedroom apartments, two-bedroom apartments, townhome units), provide Electric Vehicle technologies, accommodate solar in accordance with code requirements, and other additional amenities.

4. The project is envisioned as a revitalization of a vacant parcel removing non-conforming uses and blighted structures and constructing a mixed-use residential and commercial development with associated parking and various amenities. The proposed project would improve and maximize economic viability of the currently vacant and underutilized project site by providing a strategic zoning designation of Specific Plan (SP). This zoning would allow for the development of commercial/retail space and provide an additional 36 jobs to the city of Thousand Oaks.

5. The proposed project includes mitigation for noise impacts found to be significant and unavoidable in the EIR that would reduce construction noise. Although construction noise impacts would remain significant and unavoidable the proposed project's noise mitigation measures reduce project-specific to the extent feasible. Construction noise impacts to

sensitive receptors would be temporary in nature and cease following the completion of construction activities associated with the proposed project.

6. The project also improves the quality of the physical environment and the lives of project residents and residents in the project vicinity. The project provides approximately 124,170 square feet of accessible exterior plazas and open spaces, including a dog park, pocket parks and pathways. Two large exterior public plazas will be provided with a minimum dimension of 20 feet. A lecture room / tutoring center will also be provided as a residential amenity space with a dedication to allow the space to be used for school tutoring for children residing at the project.

7. The project would be designed to achieve U.S. Green Building Council (USGBC) Leadership in Energy and Environmental Design (LEED) Gold Certification The proposed project would achieve a LEED Gold certification, or LEED Gold equivalent, that address carbon, energy, water, waste, transportation, materials, health and indoor environmental quality. The project will integrate sustainable features beyond Title 24 requirements, including:

    - Five percent of the total parking spaces (40 spaces) will be equipped with EV chargers on the first day the apartment units are approved to be occupied,
    - Thirty percent of the parking spaces (240 spaces) will be Future EV Ready,
    - Rooftop solar,
    - Energy Star electric appliances and low flow fixtures for all 420 residential units ,
    - A dedicated car sharing program, and
    - A shared working space for flexible work-from-home options.

For the foregoing reasons, the City of Thousand Oaks concludes that the project will result in a beneficial mix of uses in a mixed-use environment providing significant housing benefits of local and regional significance. The City has balanced the project's benefits against its significant unavoidable impacts and finds that the benefits outweigh the temporary significant unavoidable construction noise impacts, which are considered acceptable in light of the benefits. The City finds that each of the benefits described above is an overriding consideration, independent of the other benefits, that warrants approval of the project notwithstanding its significant unavoidable impacts.

Significant Irreversible Environmental Changes

Section 15126.2(d) of the CEQA Guidelines requires a discussion of any significant irreversible environmental changes that would be caused by the proposed project. Specifically, Section 15126.2(d) states:

> Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement

which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

Generally, a project would result in significant irreversible environmental changes if any of the following would occur:

- The primary and secondary impacts would generally commit future generations to similar uses;
- The project would involve a large commitment of nonrenewable resources;
- The project involves uses in which irreversible damage could result from any potential environmental accidents associated with the project; or
- The project involves the wasteful use of resources.

The proposed project involves infill development on a currently developed lot in the City of Thousand Oaks. Construction and operation of the proposed project would involve an irreversible commitment of construction materials and non-renewable energy resources. The proposed project would involve the use of building materials and energy, some of which are non-renewable resources, to construct the overall building floor area of 841,153 gross square feet. However, consumption of these resources would occur with any development in the region and are not unique to the proposed project.

The proposed project would also irreversibly increase local demand for non-renewable energy resources such as petroleum products and natural gas. However, efficient building design would offset this demand to some degree by reducing energy demands of the proposed project. The proposed project would be required to meet the California Building Energy Efficiency Standards and California Green Building Standards (CALGreen; California Code of Regulations Title 24, Parts 6 and 11) to reduce environmental impacts, decrease energy costs, and create healthier living. The California Energy Code provides energy conservation standards for all new and renovated commercial and residential buildings constructed in California, and the Green Building Standards Code requires solar access, natural ventilation, and stormwater capture. Additionally, where feasible, passive sustainable design strategies to minimize overall energy consumption needed to heat and cool the building would be utilized under the proposed project. These strategies include daylighting, natural sources of heating and cooling, operable windows, shading on south facing windows, ceiling fans, well designed building envelopes with high-U values (insulation rating).

Conclusions

The City finds that the proposed project has been reviewed and that the mitigation measures identified in the Final EIR have avoided or substantially lessened several environmental impacts, to the extent feasible. Nonetheless, the proposed project may have certain environmental effects which cannot be avoided or substantially lessened. The City has carefully considered these as well as the economic, legal, social, technological, and other benefits of the project. The proposed project would allow for much need housing in the city as well as accommodate the retail and commercial needs of its residents. Additionally, the project applicant would also be required to coordinate with Southern California Edison (SCE) to identify opportunities to optimize energy infrastructure while minimizing cost and avoid barriers that may prevent future entry or expansion of energy efficient systems. Since the consumption of these resources would occur with any development in the region any impacts to the city's existing energy infrastructure would not be unique to the proposed project.

Vehicle trips associated with the proposed project would incrementally increase local traffic and regional air pollutant and greenhouse gas (GHG) emissions. However, development and operation of the proposed project would not generate air quality or GHG emissions that would result in a significant impact. Additionally, long-term impacts associated with the proposed project would be less than significant based on City and regional thresholds for roadway segment level or services and vehicle miles traveled. The proposed project would also require a commitment of law enforcement, fire protection, water supply, wastewater treatment, and solid waste disposal services. In regard to potential irreversible damage to cultural resources, the Draft EIR concluded that there are no previously recorded prehistoric or historic-period cultural resources identified within the site. However, development of the proposed project has the potential to unearth or adversely impacts previously unidentified archaeological resources or unknown human remains that could be considered a potentially significant impact. However, with implementation of the appropriate mitigation measures (BIO-1 and BIO-2, CUL-1, GEO-1a, GEO-1b, and GEO-2, GEO-3, HAZ-1 to HAZ-5), all project impacts related to cultural resources would be less than significant.

As the Lead Agency, the City has evaluated the benefits of the proposed project against its unavoidable and unmitigated environmental impacts and, based upon substantial evidence in the record, has determined that the benefits of the proposed project outweigh the adverse environmental effects.

Therefore, based on the foregoing and pursuant to Public Resources Code Section 21081(b) and CEQA Guidelines Section15091(a)(3) and 15093(b), the City finds that the remaining significant unavoidable impacts of the proposed project are acceptable and provide the substantive and legal basis for this Statement of Overriding Considerations. Finally, the City finds that, to the extent that any impacts identified in the Final EIR remain unmitigated, mitigation measures have been required to the extent feasible, although the impacts could not be reduced to a less-than-significant level. Therefore, the City finds the proposed project to be beneficial to the City's future growth and development and that such benefits outweigh such significant and unavoidable impacts and provide the substantive and legal basis for this Statement of Overriding Considerations.

EXHIBIT A
MITIGATION MONITORING AND REPORTING PROGRAM

CEQA requires that a reporting or monitoring program be adopted for the conditions of project approval that are necessary to mitigate or avoid significant effects on the environment (Public Resources Code 21081.6). This mitigation monitoring and reporting program is intended to track and ensure compliance with adopted mitigation measures during the project implementation phase. For each mitigation measure recommended in the EIR, specifications are made herein that identify the action required, the monitoring that must occur, and the agency or department responsible for oversight.

4 Mitigation Monitoring and Reporting Program

CEQA requires that a reporting or monitoring program be adopted for the conditions of project approval that are necessary to mitigate or avoid significant effects on the environment (Public Resources Code 21081.6). This Mitigation Monitoring and Reporting Program (MMRP) is intended to track and ensure compliance with adopted mitigation measures during the project implementation phase. For each mitigation measure recommended in the Final Environmental Impact Report (Final EIR), specifications are made herein that identify the action required, the monitoring that must occur, and the agency or department responsible for oversight.

Mitigation Measure	Action Required	Timing	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
Biological Resources						
BIO-1: Bat and Nesting Bird Survey Avoidance						
Project-related activities shall occur outside of the bird breeding season (generally between January 1 through September 15) to the extent practicable. If construction must occur within the bird breeding season, no more than seven days prior to initiation of ground-disturbing activities (including, but not limited to site preparation, grading, excavation, and trenching) within the proposed project site, a bird pre-construction bird nest survey shall be conducted by a qualified biologist within the disturbance footprint plus a 100-foot buffer (300-foot for raptors), where feasible. If the proposed project is phased or construction activities stop for more than one week, a subsequent pre-construction nesting bird survey shall be required within three days prior to each phase of construction. Pre-construction nesting bird surveys shall be conducted during the time of day when birds are active and shall factor in sufficient time to perform this survey adequately and completely. During the nest survey, the biologist shall inspect the outside and inside of the vacant structures for sign of roosting bats, such as presence of guano or direct observations. A report of the bat and nesting bird survey results, if applicable, shall be submitted to the City for review and approval prior to ground and/or vegetation disturbance activities. If bird nests are found, an appropriate avoidance buffer ranging in size from 25 to 50 feet for passerines, and up to 300 feet for raptors depending	**Requirements** Per Mitigation Measure BIO-1: Pre-construction surveys for nesting birds; implementation of avoidance buffers as necessary; monitoring of active nests; confirmation of lack of bat roosting on site	Prior to start of each construction phase; field inspections as necessary	City of Thousand Oaks Department of Community Development			

Mitigation Measure	Action Required	Timing	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
upon the species and the proposed work activity, shall be determined and demarcated by a qualified biologist with bright orange construction fencing or other suitable material. Active nests shall be monitored at a minimum of once per week until it has been determined that the young have fledged the nest. No ground disturbance or vegetation removal shall occur within this buffer until the qualified biologist confirms that breeding/nesting has ended, and all the young have fledged. If no nesting birds are observed during pre-construction surveys, no further actions would be necessary. If evidence of bat roosting is observed, building demolition shall not be allowed until a qualified biologist can verify that the roost is no longer active. If necessary, bats may be evicted and building demolished following submittal and approval of a Bat Avoidance Plan by CDFW.						
BIO-2: Minimize Impacts to Protected Trees						
The project shall take all necessary actions to comply with the requirements of the City's Oak Tree Preservation and Protection Guidelines and Oak and Landmark Tree Ordinance. These include preserving protected trees located on the project site whenever possible. A permit is required by the City before the start of project activities if any tree will be trimmed, cut, or removed. ▪ In accordance with the City of Thousand Oaks Tree Protection Guidelines the oak trees on the project site that would be removed shall be replaced at a ratio of 3:1 with two 24-inch box coast live oak trees and one 36-inch or 60-inch box coast live oak tree. Three coast live oak	**Requirements:** On-site planting of 9 coast live oak trees (two 24-inch box and one 36-inch or 60-inch box sized coast live oak tree), inspection of trees conducted by an arborist prior to tree removal, and implementation of Section 5 of the Oak and Landmark Tree Protection Plan; approval by CD Director prior to approval of any tree grading permits	Prior to the issuance of grading permits; field inspections as necessary	City of Thousand Oaks Department of Community Development			

Mitigation Measure	Action Required	Timing	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
trees will be removed; therefore, nine coast live oak trees shall be planted onsite. An arborist shall conduct an inspection of diseases, pests or pathogens prior to protected tree removal and any infected trees be disposed using best available management practices relevant for each tree disease observed.All mitigation oak and landmark trees shall be monitored annually for a period of 5 years following installation. All mitigation oak trees shall be in good-to-excellent health at the end of the 5 year monitoring period and any trees that die or are in fair-to-poor health at the end of the 5 year monitoring period must be replaced with a healthy tree, and the replacement tree(s) shall be monitored for a period of 5 years until every mitigation tree is in good-to-excellent health 5 years after installation.						
Cultural Resources/Tribal Cultural Resources						
CUL-1: Archaeological Resource Discovery Protocol						
If archaeological deposits are encountered during project-related ground disturbing activities, then a cultural resource "discovery" protocol will be followed. If historic or prehistoric features or artifact concentrations are encountered during project grading within native soils or original context, then all work in that area will be halted or diverted 30 feet away from the discovery until a qualified archaeologist is contacted and evaluates the nature and/or significance of the find(s). If the discovery is prehistoric in origin, a Native American representative will be contacted to participate in the evaluation. If an archaeologist confirms that the discovery is potentially significant, then the	**Requirements:** Per Mitigation Measure CUL-1, follow cultural resources discovery protocols; coordinate and consult with a qualified archeologist, Native Tribal groups, and Lead/Permitting Agency; site monitoring or data recovery or complete avoidance cultural resources finds.	Daily throughout construction	City of Thousand Oaks Department of Community Development			

Mitigation Measure	Action Required	Timing	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
Lead/Permitting Agency will be contacted and informed of the discovery. Construction will not resume in the locality of the discovery until consultation between the qualified archaeologist, the Applicant's project manager, the Lead/Permitting Agency, and any other concern parties (such as additional regulatory agencies or Native American Tribal Groups), takes place and reaches a conclusion approved by the Lead/Permitting Agency. If a significant cultural resource is discovered during earth-moving, complete avoidance of the find is preferred. However, if the discovery cannot be avoided, data recovery of the significant resource may be required by the City. The City may also require site monitoring, based on the discovery. All individual reports will be submitted to the SCCIC at the conclusion of the project.						
CUL-2: Inadvertent Discovery of Human Remains						
The inadvertent discovery of human remains is always a possibility during ground disturbances; State of California Health and Safety Code Section 7050.5 addresses this possibility. This code section states that in the event human remains are uncovered, no further disturbance shall occur until the County Coroner has made a determination as to the origin and disposition of the remains pursuant to PRC Section 5097.98. The County Coroner must be notified of the find immediately, along with the Lead/Permitting Agency and the Applicant. If the human remains are determined to be prehistoric, the County Coroner will notify the NAHC, which will determine and notify a Most Likely	**Requirements:** Per Mitigation Measure CUL-2, adhering to the requirements of the discovery of human remains the qualified archaeologist shall contact and coordinate with the County Coroner and Lead/Permitting Agency, Most Likely Descendant, as required; follow additional mitigation established by the Lead/Permitting Agency, archaeologist, and Most Likely Descendant.	During construction	City of Thousand Oaks Department of Community Development; County of Ventura Coroner Office			

Mitigation Measure	Action Required	Timing	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
Descendant (MLD). The MLD shall complete the inspection of the site within 48 hours of being granted access. The Lead/Permitting Agency and a qualified archaeologist shall also establish additional appropriate mitigation measures for further site construction, in consultation with the MLD.						
Geology and Soils						
GEO-1a: Geotechnical Recommendations						
The geotechnical recommendations contained in the 2005 Twining Geotechnical Report shall be fully implemented. Among the study recommendations are specific parameters relating to: ▪ **Foundation Design** – over-excavation and compaction for foundations, soil stabilization, shoring, etc., conducted as indicated in the geotechnical report ▪ **Structural Fills** – the applicant shall comply with the recommendations contained in the Twining September 13, 2005 geotechnical report regarding site preparation. This includes over-excavating on-site soils so that new foundations are supported on a minimum of two feet of engineered fill or engineered fill extending to a depth of five feet below preconstruction site grades, whichever provides the deeper fill. These recommendations shall be fully implemented in order to comply with UBC standards and would reduce impacts to a less than significant level	**Requirements:** Per Mitigation Measure GEO-1a, the developer shall retain a Geotechnical Engineer approved by the City Engineering Department to implement Twining Geotechnical Report recommendations in project design; provide proof of implementation of recommendations of site design features in the Twining Geotechnical Report to the City Engineer prior to issuance of building permit.	Prior to the issuance of building permits	City of Thousand Oaks Department of Public Works			

Mitigation Measure	Action Required	Timing	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
▪ **Structural Footings** – minimum footing embedment depths, widths, and net vertical soil bearing pressures ▪ **Concrete Slabs** – testing of exposed subgrades prior to concrete pours, reinforcement of concrete slabs, use of moisture barriers or sand layers beneath slabs ▪ **Site Preparation** – compliance with SWPPP and SWPCP requirements Additionally, the 2021 Gorian report recommended the following site design features: ▪ Positive drainage should be continuously maintained away from structures and slopes. Ponding or trapping of water in localized areas near the foundations can cause differential moisture levels in subsurface soils. Plumbing leaks should be immediately repaired so that the subgrade soils underlying the structure do not become saturated. ▪ Trees and large shrubbery should not be planted where roots can grow under foundations and flatwork when they mature. ▪ Landscape watering should be held to a minimum; however, landscaped areas should be maintained in a uniformly moist condition and not allowed to dry-out. During extreme hot and dry periods, adequate watering should be provided to keep soil from separating or pulling back from the foundations. Prior to the issuance of building permits, a qualified Geotechnical Engineer retained by the applicant shall provide evidence to the City of Thousand Oaks						

Mitigation Measure	Action Required	Timing	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
Engineer that the geotechnical mitigation measure GEO-1a is implemented as described above.						
GEO-1b: Geotechnical Oversight						
A qualified Geotechnical Engineer shall be retained to perform the following tasks prior to and during construction: ▪ Review final grading, foundation, and drainage plans to verify that the recommendations contained in the 2005 Twining study have been properly interpreted and are incorporated into the project specifications. ▪ Observe and advise during all grading activities, including site preparation, foundation and retaining wall excavation, and placement of fill, to confirm that suitable fill materials are placed upon competent material and to allow design changes if subsurface conditions differ from those anticipated prior to the start of grading and construction. ▪ Observe the installation of all drainage devices. ▪ Test all fill placed for engineering purposes to confirm that suitable fill materials are used and properly compacted. The qualified Geotechnical Engineer shall provide evidence to the City of Thousand Oaks Engineer that the geotechnical mitigation measure GEO-1b is implemented as described above.	**Requirements:** Per Mitigation Measure GEO-1b, **the developer shall** retain a Geotechnical Engineer to review all tasks under GEO-1b, including but not limited to: final plans, observe grading activities, observe drainage device installation, test fill placed during construction and provide proof of implementation measure GEO-1b to the City Engineer.	Prior to and during construction	City of Thousand Oaks Department of Public Works			

Mitigation Measure	Action Required	Timing	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
GEO-2: Site Preparation						
Based on the nature of the subsurface soil conditions, it should be anticipated that unstable soil conditions would be encountered during excavation and installation of slabs-on-grade, foundations, utilities, etc. Therefore, the soils may require stabilization. Soils shall be stabilized in accordance with the Twining Report (2005), including the procedures in the Appendices for Chemical Treatment of Soil. Stabilization of the subgrade soils shall be performed in a uniform manner. If stabilization of the subgrade soils is necessary, it shall be performed in the entire building area, including the overbuild zone. Additionally, all recommendations provided in the Gorian Report (2021) regarding soil expansiveness shall be implemented, evidence of implementation shall be provided to the City engineer prior to the issuance of a grading permit.	**Requirements:** Per Mitigation Measure GEO-2, implement all soil stabilization recommendations in the Twining report and soil expansion recommendations in the Gorian report; provide proof of implementation to City Engineer prior to request of grading permit.	Prior to the issuance of grading permits.	City of Thousand Oaks Department of Public Works			
GEO-3: Paleontological Resources Monitoring and Mitigation						
1. **Qualified Paleontologist.** The project applicant shall retain a Qualified Paleontologist to direct all mitigation measures related to paleontological resources. A qualified professional paleontologist is defined by the Society of Vertebrate Paleontology (SVP) standards (SVP 2010) as an individual preferably with an M.S. or Ph.D. in paleontology or geology who is experienced with paleontological procedures and techniques, who is knowledgeable in the geology of California, and who has worked as a paleontological mitigation	**Requirements:** Per Mitigation Measure GEO-3, retain a Qualified Paleontologist as defined by the Society of Vertebrate Paleontology (SVP) standards (SVP 2010) as an individual preferably with an M.S. or Ph.D. in paleontology or geology, to direct paleontological mitigation; require Worker Environmental Awareness Program training for construction personnel; follow all paleontological resource discovery protocols; conduct full-time paleontological monitoring; submit a Final Paleontological Mitigation Report to	Prior to construction activities If resources are encountered, prepare a report describing resources, retaining any resources for submittal to the Natural History Museum (NHM) of Los Angeles; or retaining the resources if the NHM	City of Thousand Oaks Department of Community Development			

Mitigation Measure	Action Required	Timing	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
project supervisor for a least two years (SVP 2010).	the City Planning Department, and designated museum repository	does not want to archive and creating a documented recovery report the Final Paleontological Mitigation Report to the City Planning Department, and designated museum repository				
2. **Paleontological Worker Environmental Awareness Program.** Prior to the start of construction, the Qualified Paleontologist or their designee shall conduct a paleontological Worker Environmental Awareness Program (WEAP) training for construction personnel regarding the appearance of fossils and the procedures for notifying paleontological staff should fossils be discovered by construction staff.						
3. **Paleontological Monitoring.** Full-time paleontological monitoring shall be conducted during ground disturbing construction activities (i.e., grading, trenching, foundation work) within native (i.e., previously undisturbed) sediments of any depth in the lower Monterey Formation and depths greater than five feet in Quaternary alluvium. Ground disturbing activities that only impact artificial fill (i.e., previously disturbed) sediments do not require paleontological monitoring. Paleontological monitoring shall be conducted by a qualified paleontological monitor, who is defined as an individual who has experience with collection and salvage of paleontological resources and meets the minimum standards of the SVP (2010) for a Paleontological Resources Monitor. The duration and timing of the monitoring will be determined by the Qualified Paleontologist based on the observation of the geologic setting from initial ground disturbance, and subject to the review and approval by the City of Thousand						

Mitigation Measure	Action Required	Timing	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
Oaks. If the Qualified Paleontologist determines that full-time monitoring is no longer warranted, based on the specific geologic conditions once the full depth of excavations has been reached, they may recommend that monitoring be reduced to periodic spot-checking or ceased entirely. Monitoring shall be reinstated if any new ground disturbances are required, and reduction or suspension shall be reconsidered by the Qualified Paleontologist at that time. In the event of a fossil discovery by the paleontological monitor or construction personnel, all work in the immediate vicinity of the find shall cease. A Qualified Paleontologist shall evaluate the find before restarting construction activity in the area. If it is determined that the fossil(s) is (are) scientifically significant, the Qualified Paleontologist shall complete the following conditions to mitigate impacts to significant fossil resources: a. **Salvage of Fossils.** If fossils are discovered, the paleontological monitor shall have the authority to halt or temporarily divert construction equipment within 50 feet of the find until the monitor and/or lead paleontologist evaluate the discovery and determine if the fossil may be considered significant. Typically, fossils can be safely salvaged quickly by a single paleontologist and not disrupt construction activity. In some cases, larger fossils (such as complete skeletons or large mammal fossils) require more extensive excavation and longer salvage periods. Bulk matrix sampling may be						

Mitigation Measure	Action Required	Timing	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
necessary to recover small invertebrates or microvertebrates from within paleontologically sensitive deposits b. **Preparation and Curation of Recovered Fossils**. Once salvaged, significant fossils shall be identified to the lowest possible taxonomic level, prepared to a curation-ready condition, and curated in a scientific institution with a permanent paleontological collection, along with all pertinent field notes, photos, data, and maps. Fossils of undetermined significance at the time of collection may also warrant curation at the discretion of the Qualified Paleontologist. 4. **Final Paleontological Mitigation Report.** Upon completion of ground disturbing activity (and curation of fossils if necessary) the Qualified Paleontologist shall prepare a final report describing the results of the paleontological monitoring efforts associated with the project. The report shall include a summary of the field and laboratory methods, an overview of the project geology and paleontology, a list of taxa recovered (if any), an analysis of fossils recovered (if any) and their scientific significance, and recommendations. The report shall be submitted to the City of Thousand Oaks. If the monitoring efforts produced fossils, then a copy of the report shall also be submitted to the designated museum repository.						

Mitigation Measure	Action Required	Timing	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
Hazards and Hazardous Materials						
Prior to the issuance of any demolition or grading permits, the project applicant shall contact the Ventura County Environmental Health Division (VCEHD) to discuss the proposed redevelopment project, the proposed change to residential land use, the known hazardous material soil, soil vapor, and groundwater impacts onsite, and the adjacent closed release case at 395 Hampshire Road (Shell Station – Case #02004). The project applicant shall provide VCEHD with the proposed site use plans regarding the conversion of commercial land use to residential land use and discuss the onsite presence of groundwater impacted by volatile organic compounds (VOCs) at the proposed residential development. The project applicant shall provide the City Planning Department with copies of all communications to and from VCEHD. VCEHD may require the project applicant or the adjacent property owner to conduct additional investigation/studies, including, but not limited to, soil vapor, soil, and/or groundwater investigations, which could help delineate the extent of contaminated soil, soil vapor, and groundwater and allow for the proposed project to be designed in a manner to avoid or minimize impacts to proposed construction and operation of the residential development.	**Requirements:** Per Mitigation Measure HAZ-1, provide the VCEHD with notification of development and all project details as included in HAZ-1; provide City Planning Department with copies of all correspondence with VCEHD.	Prior to the issuance of demolition or grading permits	City of Thousand Oaks Department of Community Development			

Mitigation Measure	Action Required	Timing	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
HAZ-2: Regulatory Agency Voluntary Oversight Agreement						
Prior to issuance of a grading permit, the applicant shall enter into a Voluntary Oversight Agreement with VCEHD to provide regulatory oversight of identified releases at the project site. VCEHD shall be utilized for agency oversight of assessment and remediation within the site through completion of building demolition, subsurface demolition, and construction the proposed project. Additionally, the project applicant shall notify the VCEHD project manager of the following: ▪ Current development plan and any modifications to the development plan ▪ All written documents concerning hazardous material impacts to soil, soil vapor, and or groundwater, including, but not limited to, Phase I ESAs, Phase II ESAs, geophysical surveys, and other subsurface investigations. ▪ All former environmental documents completed for the project site, including this EIR ▪ Other documents, as requested by VCEHD Upon notification of the information above, VCHED could require actions such as: development of subsurface investigation workplans; completion of soil vapor, soil, and/or groundwater investigations; installation of soil vapor or groundwater monitoring wells; soil excavation and offsite disposal; completion of human health risk assessments; and/or completion of remediation reports or case closure documents. The project applicant shall retain a qualified environmental consultant, California Professional Geologist (PG) or California	**Requirements:** Per Mitigation Measure HAZ-2, enter into Voluntary Oversight Agreement with the VCEHD; Retain qualified environmental California PG or California PE to prepare all documents requested by VCEHD. Submit letter to VCEHD detailing abandonment activities; submit all VCEHD approved documents to the City Planning Department prior to request for grading permit(s).	Prior to the issuance of grading permits and during construction	City of Thousand Oaks Department of Community Development; DTSC; LARWQCB			

Mitigation Measure	Action Required	Timing	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
Professional Engineer (PE), to prepare the documents required by VCEHD. If groundwater wells or soil vapor monitoring probes are identified during demolition, subsurface demolition, or construction at the project site, they shall be abandoned per City of Thousand Oaks Public Works Department specifications. Abandonment activities will be documented in a letter report submitted to VCEHD within 60 days of the completion of abandonment activities. The VCEHD closure and agency approval documents shall be submitted to the City Planning Department prior to issuance of grading permits. It should also be noted that VCEHD may determine that the Los Angeles Regional Water Quality Control Board (LARWQCB) or California Department of Toxic Substances Control (DTSC) may be best suited to perform the lead agency duties for assessment and/or remediation at the project site. Should the lead agency be transferred to LARWQCB or DTSC, this and other mitigation measures would still apply.						
HAZ-3: Site Management Plan for Impacted Soils, Soil Vapor and/or Groundwater						
The project applicant shall retain a qualified environmental consultant (PG or PE) to prepare a Soil and Groundwater Management Plan prior to construction. The Soil and Groundwater Management Plan, or equivalent document, shall address onsite handling and management of impacted soils, soil vapor, groundwater, or other impacted wastes, and reduce hazards to construction workers and offsite receptors during construction. The plan must establish remedial measures and/or soil management practices to	**Requirements:** Per Mitigation Measure HAZ-3, retain qualified environmental California PG or California PE to prepare Soil and Groundwater Management Plan as required under HAZ-3; obtain VCEHD approval of plan, evidence of verified approval with City Planning Department and City Engineer	Prior to the issuance of demolition and grading permits	City of Thousand Oaks Department of Community Development; City of Thousand Oaks Public			

Mitigation Measure	Action Required	Timing	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
ensure construction worker safety, the health of future workers and visitors, and the off-site migration of contaminants from the project site. These measures and practices may include, but are not limited to: ▪ Stockpile management including stormwater pollution prevention and the installation of BMPs ▪ Proper handling and disposal procedures of contaminated building materials, soil, and groundwater ▪ Monitoring and reporting ▪ A health and safety plan for contractors working at the project site that addresses the safety and health hazards of each phase of site construction activities with the requirements and procedures for employee protection The health and safety plan shall also outline proper soil handling procedures and health and safety requirements to minimize worker and public exposure to hazardous materials during construction. VCEHD shall review and approve the Soil and Groundwater Management Plan prior to demolition and grading (construction). The project applicant shall review and implement the Soil and Groundwater Management Plan prior to demolition and grading (construction). Evidence of the review and approval by VCEHD shall be provided to the City Planning Department and City Engineers prior to the issuance of any demolition or grading permits.			Works Department			

Mitigation Measure	Action Required	Timing	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
HAZ-4: Remediation						
If soils within the construction envelope at the development site contain chemicals at concentrations exceeding hazardous waste screening thresholds for contaminants in soil (California Code of Regulations [CCR] Title 22, Section 66261.24), the project applicant shall retain a qualified environmental consultant (PG or PE) to conduct additional analytical testing and recommend soil disposal recommendations, or consider other remedial engineering controls, as necessary. The qualified environmental consultant shall utilize the development site analytical results for waste characterization purposes prior to offsite transportation or disposal of potentially impacted soils or other impacted wastes. The qualified environmental consultant shall provide disposal recommendations and arrange for proper disposal of the waste soils or other impacted wastes (as necessary), and/or provide recommendations for remedial engineering controls, if appropriate. Remediation of impacted soils and/or implementation of remedial engineering controls may require additional delineation of impacts; additional analytical testing per landfill or recycling facility requirements; soil excavation; and offsite disposal or recycling. VCEHD will review and approve the disposal recommendations prior to transportation of waste soils offsite, and review and approve remedial engineering controls, prior to construction. The project applicant shall review the disposal and	**Requirements:** Per Mitigation Measure HAZ-4, retain a qualified environmental California PG or California PE for soil testing, remediation and disposal; obtain VCEHD approval of recommendations; evidence of verified approval with City Planning Department and City Engineer; implement approved recommendations	Prior to the issuance of demolition or grading permits	City of Thousand Oaks Department of Community Development; City of Thousand Oaks Public Works Department			

Mitigation Measure	Action Required	Timing	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
remedial engineering control recommendations prior to the issuance of any demolition permits. The project applicant shall implement the disposal recommendations and implement the remedial engineering controls during demolition/construction. Evidence of the review and approval by VCEHD shall be provided to the City Planning Department and City Engineering Department prior to the issuance of any demolition or grading permits.						
HAZ-5: Vapor Mitigation System						
VCEHD may require the installation of a sub-slab vapor barrier system at the proposed project. The project applicant shall retain a qualified environmental consultant (PG or PE) or other qualified person to prepare a sub-slab vapor barrier system design for the proposed project. The plan may include, but is not limited to: ▪ Design specifications ▪ Material specifications ▪ Installation requirements ▪ Monitoring requirements The project applicant shall incorporate a sub-slab vapor barrier system during construction, the implementation of which would reduce the potential for soil gas VOCs from migrating to indoor air within the residential building. VCEHD will review and approve the sub-slab vapor barrier system prior to construction. Evidence of the review and approval by VCEHD shall be provided to the City Planning Department and	**Requirements:** Per Mitigation Measure HAZ-5, retain a qualified environmental California PG or California PE to prepare and implement sub-slab vapor barrier system design, obtain VCEHD approval of design; evidence of verified approval with City Planning Department and City Engineer	Prior to the issuance of demolition or grading permits	City of Thousand Oaks Department of Community Development; City of Thousand Oaks Public Works Department			

Mitigation Measure	Action Required	Timing	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
City Engineers prior to the issuance of any demolition or grading permits.						
Noise						
NOI-1: Construction Noise Reduction Measures						
▪ Temporary construction barriers along the southern edge of the project site facing the Westlake Villas multifamily residences at 575 Hampshire Road and along the northwestern edge of the project facing the Windsor Terrace of Westlake Village convalescent home at 250 Fairview Road shall be in place during the Project construction (including demolition, grading, and site preparation), when heavy construction equipment is used, excluding areas where gaps in the barrier are necessary for access. The barrier shall be least 12 feet in height above the project site existing grade level and constructed of a material with a Sound Transmission Class (STC) rating of at least STC-31 (such as acoustic panels or sound barrier products) or a transmission loss of at least 21 dB at 500 hertz (such as 3/4-inch plywood), which would provide an insertion loss (net barrier reduction) of up to 11 dB at the convalescent home and multifamily residences. ▪ Power construction equipment (including combustion engines), fixed or mobile, shall be equipped with state-of-the-art noise shielding and muffling devices (consistent with manufacturers' standards). All equipment shall be properly maintained to assure that no additional noise, due to worn or improperly maintained parts, would be generated.	**Requirements:** Per Mitigation Measure NOI-1, implement minimum 12 foot high temporary construction barriers as laid out under NOI-1 power construction equipment shall include noise shielding and muffling devices, rubber-tired equipment with the exception of excavation equipment shall be used and maintained properly; Construction activities shall use on site electric power and stationary construction equipment; site electrical power and stationary construction equipment shall be shielded and placed as far as possible from off-site receptors; locate construction and delivery areas to center of site; construction activity, hours of operation and construction manager and supervisor contact information shall be posted on site at all times; inform the following of all construction related activities and timing: the Little Dreamers Early Childhood preschool, the Windsor Terrace of Westlake Village convalescent home, the single-family residences and multifamily communities to the west (along Foothill Drive, south of Fairview Road), and the Westlake Villas apartment community.	Prior to and during construction	City of Thousand Oaks Department of Community Development			

Mitigation Measure	Action Required	Timing	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
▪ With the exception of excavation equipment, grading and construction contractors shall use rubber-tired equipment rather than metal-tracked equipment. ▪ The use of on-site electrical power shall be preferred to the use of stationary construction equipment such as generators or air compressors. If stationary construction equipment would be used on site for more than one hour in a day, such equipment shall be placed as far as possible from off-site sensitive receivers. Stationary construction equipment shall also be shielded by either noise blankets or by temporary noise barriers at least three feet taller and six feet wider than the noise source. ▪ Construction staging and delivery areas shall be located towards the center of the property and a minimum of 100 feet from the project lines. ▪ The project applicant shall post a notice at the construction site. The notice shall contain information on the type of project, anticipated duration of construction activity, and provide a phone number where people can register questions or complaints. The notice shall be posted no later than 72 hours prior to the planned activity. ▪ Based on areas of construction noise impacts, the Little Dreamers Early Childhood preschool, the Windsor Terrace of Westlake Village convalescent home, the single-family residences and multifamily communities to the west (along Foothill Drive, south of Fairview Road), and the Westlake Villas apartment community to the						

Mitigation Measure	Action Required	Timing	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
south shall be informed via mail and posting at the site of the anticipated start date, duration, noise impact, and other pertinent information prior to the construction of the project. Notification shall also include a phone number where people can register questions or complaints. Notification shall also be delivered no later than 72 hours prior to the planned activity. ▪ An on-site construction manager shall be responsible for responding to local complaints about construction noise. All notices that are sent to sensitive receivers and all signs posted at the construction site shall list the telephone number for the on-site construction manager. ▪ Construction supervisors shall be informed of project-specific noise requirements, noise issues for sensitive land uses adjacent to and near the project construction site, and/or equipment operations to ensure compliance with the required regulations and best practices.						
NOI-2 Construction Equipment Vibration Restrictions						
▪ Large bulldozers or similar equipment shall not operate within eight feet of the Shell Gas Station, smaller equipment shall be substituted within this distance. ▪ As the medical office building could potentially experience temporary construction-related and intermittently "strongly perceptible" vibration from vibratory/sonic pile driving activity occurring within 36 feet of the building, the developer shall give prior notice to that facility of any such activity within that distance, the	**Requirements:** Per Mitigation Measure NOI-2, no operation of construction and pile driving equipment within eight feet of the Shell Gas Station and within 36 feet of the medical office building; no large bulldozers and similar large equipment shall be operation within 24 feet of the Little Dreamers Early Childhood Preschool building, the Windsor Terrace of Westlake Village convalescent home, or the medical office building; submit proof of notice to	During construction	City of Thousand Oaks Department of Community Development			

Mitigation Measure	Action Required	Timing	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
developer shall provide evidence of notification to the City Planning Department prior to initiation of pile driving activities. ▪ Vibratory pile driving activity within 36 feet of the medical office building shall be scheduled during times outside of its hours of operation. Large bulldozers or similar equipment shall not operate within 24 feet of the preschool building, the Windsor Terrace of Westlake Village convalescent home, or the medical office building, with smaller equipment substituted within this distance.	the City Planning Department; schedule pile driving operations outside hours of medical office building operation.					